

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Improvements to Generator Interconnection)
Procedures and Agreements.)

Docket No. RM22-14-000

**COMMENTS OF THE PUBLIC UTILITIES COMMISSION OF OHIO’S
OFFICE OF THE FEDERAL ENERGY ADVOCATE**

The Federal Energy Regulatory Commission (“FERC” or the “Commission”) proposes, under Section 206 of the Federal Power Act, to reform its pro forma Large Generator Interconnection Procedures (“LGIP”), pro forma Small Generator Interconnection Procedures (“SGIP”), pro forma Large Generator Interconnection Agreement (“LGIA”), and pro forma Small Generator Interconnection Agreement (“SGIA”) to address interconnection queue backlog, improve cost and timing certainty, and prevent undue discrimination against new technologies. Inasmuch as new requirements will help relieve PJM Interconnection, LLC’s (“PJM”) interconnection queue backlog, define clear planning expectations, and increase reliability of the transmission system, the Office of the Federal Energy Advocate (“Ohio FEA”) within the Public Utilities Commission of Ohio (“PUCO”) generally supports FERC’s Notice of Proposed Rulemaking (“NOPR”).

I. BACKGROUND

The Commission’s most recent reforms to its regional transmission planning, cost allocation, and generator interconnection processes began when, in July 2021, FERC issued an Advance Notice of Proposed Rulemaking (“ANOPR”) to ensure that Commission-jurisdictional

rates remain just and reasonable and not unduly discriminatory or preferential.¹ The Commission noted the high volume of new resources attempting to interconnect to the transmission system as the generation fleet shifts toward renewable and other types of resources that may be located far from population centers.² The Commission convened a technical conference in November 2021 to discuss issues and potential reforms to the regional transmission process. FERC also established the Joint Federal-State Task Force on Electric Transmission (“Task Force”), indicating that the process should have greater federal-state cooperation and coordination. The Ohio FEA attended the several sessions of the Task Force and filed comments in response to the ANOPR and FERC’s subsequent Notice of Proposed Rulemaking on transmission planning and cost allocation, generally supporting the Commission’s review of existing long-term planning processes but cautioning that the advent of a new generation mix is not a sufficient reason to abandon practices that have been resolved by years of litigation. We have also followed with interest the Commission’s observation that existing piecemeal planning could be replaced with an approach to cluster generator interconnection requests in a more efficient and holistic process, among other changes.³ Changes from existing processes can – and should – make generator interconnection less lengthy and will come none too soon.

The Commission acknowledged the growing problem of interconnection queue backlog in its ANOPR, within the larger scope of transmission planning.⁴ Given the issue-specific stakeholder feedback received by FERC and discussions with its state counterparts, especially

¹ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, Advance Notice of Proposed Rulemaking, 176 FERC ¶ 61,024 (2021).

² ANOPR at ¶ 3.

³ ANOPR at ¶ 35.

⁴ ANOPR at ¶ 126.

the third meeting of the Task Force that was largely dedicated to the growing problem of interconnection queue backlog, the Commission has put forward a focused NOPR, which proposes to reform its LGIP, SGIP, LGIA, and SGIA to address the backlog and improve certainty – not just on timing and scheduling but also on costs. The Ohio FEA agrees with FERC that change is needed for generation facilities to reach commercial operation in an efficient and timely manner.

Ohio’s views on the issues within this NOPR are from the perspective of PJM’s interconnection procedures, queue backlog, and ongoing interconnection reform process, which the Ohio FEA believes is a move in the right direction.⁵ Such perspective does not overlook the extensive review and consensus achieved in the PJM stakeholder process under the Interconnection Process Reform Task Force and PJM’s comprehensive overhaul of its interconnection tariff, which was filed with FERC following the 18-month stakeholder process. As we stated in our comments in that proceeding, FERC should act quickly on PJM’s proposal and not wait until interconnection process reform issues are resolved through this NOPR.

In Ohio, around 850 interconnection service requests are currently caught in PJM’s interconnection queue. The magnitude of Ohio generation in the queue overshadows the amount of generation that is in service. The table below illustrates Ohio’s interconnection queue logjam.

Table 1. Ohio Generation In PJM GI Service Queues.⁶

PJM GI New Service Queue Status (OH)	Energy (MW)	Capacity (MW)	In Service (MW)
Active	34164.18	23639.823	-

⁵ On June 14, 2022, PJM filed its package of proposed interconnection reforms with FERC. *In re PJM Interconnection, L.L.C.*, Docket No. ER22-2110-000, Tariff Revisions for Interconnection Process Reform, Request for Commission Action by October 3, 2022, and Request for 30-Day Comment Period.

⁶ Data retrieved on October 13, 2022, from <https://pjm.com/planning/services-requests/interconnection-queues>.

Deactivated	149.35	126.5	137.35
Engineering and Procurement	4323.24	2703.21	1
In Service	7875.19	6347.93	7637.5871
Partially In Service - Under Construction	404.65	154.82	25.5
Suspended	1665.9	1276.53	-
Under Construction	2479	2152.4	-
Withdrawn	48431.732	32498.698	-
Total MW In GI New Service Queues (OH)	99493.242	68899.911	-
Total MW In Service (OH)	-	-	7526.7371

Key

	Highlighted cells indicate above Ohio averages.
Energy (MW)	Megawatts energy for the interconnection request (Winter net).
Capacity (MW)	Capacity interconnection request for the queue position (Summer net).
In Service (MW)	Number of megawatts when the project is in service.

The Ohio FEA recognizes the urgent need to clear the current generator interconnection queue backlog and to facilitate timely and economic interconnection of new resources in a way that responds to current and future market conditions. We generally agree with the Commission's proposed measures to look holistically at interconnection planning for the present and the future. We offer the following comments for the Commission's consideration.

II. COMMENTS

A. Implementing a First-Ready, First-Served Cluster Study Process

1. Interconnection Information Access

Transparency has been a primary focus of FERC’s pro forma LGIP and pro forma SGIP since they were established in 2003.⁷ Increased transparency has been a driver of recent reform efforts in FERC’s Order No. 845 rulemaking.⁸ The Ohio FEA agrees with the Order No. 845 tenets that transparency enhances the timeliness, clarity, and consistency of information, which improves interconnection customers’ ability to assess potential generation projects, and thereby mitigate interconnection requests for projects that have little chance of reaching commercial operation. However, speculative project requests have continued to escalate since Order No. 845. This is largely due to placeholder requests to bring new generation online faster and price discovery efforts to determine points of interconnection (“POI”) with the least cost in network upgrades – both of which are implicit symptoms of a serial queue-based approach. The existing first-come, first-served serial study process based on the date of entry into the queue does not allow for sufficient access to information. Accordingly, the Ohio FEA believes that a cluster-based mechanism to study interconnection requests in groups with inherent interdependencies would enable information sharing.

The Ohio FEA also supports reporting mechanisms and metrics to increase transparency and allow stakeholders to monitor interconnection service timeliness. Such metrics are already required of regional transmission organizations and independent system operators by FERC Order Nos. 845 and 845A and PJM continues to file these reports bi-annually.⁹

⁷ *Standardization of Generator Interconnection Agreements and Procedures*, Order No. 2003, 104 FERC ¶ 61,103 (2003).

⁸ *Reform of Generator Interconnection Procedures and Agreements*, Order No. 845, 163 FERC ¶ 61,043 (2018).

⁹ *Reform of Generator Interconnection Procedures and Agreements*, Order No. 845, 163 FERC ¶ 61,043 (2018), order on reh’g & clarification, Order No. 845-A, 166 FERC ¶ 61,137, order on reh’g & clarification, Order No. 845-B, 168 FERC ¶ 61,092 (2019).

a. Informational Interconnection Study

To address the lack of information available to interconnection customers prior to entering the interconnection queue, the Commission proposes to revise the pro forma LGIP to require transmission providers to offer an informational interconnection study to prospective interconnection customers.¹⁰ The Ohio FEA generally supports the idea of an informational interconnection study provision, but, as FERC has correctly recognized, the benefits of the informational interconnection study would depend on various modeling assumptions and scenarios and the quality of information provided.¹¹ Further, according to the NOPR, each configuration of an interconnection request would require a separate informational interconnection study.¹² Given the complex analysis involving modeling and optimization based on various determinants, any allowance of pre-queue studies should not have the unintended consequence of interfering with the studies necessary to clear the immediate backlog issues.¹³

b. Public Interconnection Information

FERC also proposes to set minimum requirements for transmission providers to publicly post available information pertaining to generator interconnection – specifically in the form of an interactive visual representation of available interconnection capacity, as well as a table of relevant interconnection metrics that allow prospective interconnection customers to see certain estimates of a potential generating facility’s effect on the transmission provider’s transmission system.¹⁴ The Ohio FEA maintains that the identification of sites most suitable for generation resource development depends on much more than the location and geography of resources, which is

¹⁰ NOPR at ¶ 42.

¹¹ NOPR at ¶¶ 42, 47.

¹² NOPR at ¶ 43.

¹³ FERC proposes a maximum of five informational interconnection study requests pending at a time for a prospective interconnection customer. NOPR at ¶ 43.

¹⁴ NOPR at ¶ 51.

publicly available from reliable sources such as the national labs and the Energy Information Administration. An interactive visual representation of available interconnection capacity would be beneficial to transmission providers and prospective interconnection customers alike. The Ohio FEA believes such a tool would provide users with visual cueing for grid congestion and encourage such information sharing during the interconnection review process. FERC’s proposal of an interactive visual representation would give a reasonable estimate of capacity available at each bus and the impact of a new generating facility on existing facilities. However, the Ohio FEA questions whether such a tool would capture the dynamic elements of cluster studies and re-studies.

The Ohio FEA notes that PJM has started to develop an “Interconnection Screening Tool,”¹⁵ which is meant to assist users in evaluating placement of future generators even before formally entering the PJM queue. The Interconnection Screening Tool is expected to screen the POI, leverage stored results from generator deliverability analysis, and provide facility loading impacts and headroom (MW) by POI. This tool is in the initial stages of development and its efficacy is still to be determined.

2. Cluster Study

FERC proposes to move to a “first-ready, first-served process” that groups projects in clusters for purposes of studying and allocating costs.¹⁶ The Ohio FEA is generally in favor of measures that would speed up the interconnection review process. We agree with FERC’s proposal to conduct system impact studies and cost responsibility for groups of projects, or

¹⁵ <https://pjm.com/-/media/committees-groups/subcommittees/ips/2022/20220928/item-05---overview-of-queue-scope.ashx>.

¹⁶ NOPR at ¶ 64.

clusters, instead of using the current serial first-come, first-served study process. As FERC states, and the Ohio FEA concurs, clustering projects in the same cycle “increases efficiency of the interconnection process and would help prevent delays in the future.”¹⁷ Larger interconnection studies encompassing numerous generators would be especially beneficial for developers with multiple projects in close geographical proximity. The Ohio FEA is also in favor of transitioning to a “first-ready, first-served” queue approach, as this method will allow projects that are further along in development to be accelerated through the process and reduce the number of speculative projects. Under FERC’s proposed “first-ready, first-served” process, only projects that meet threshold criteria such as demonstration of continued site control, readiness deposits, and evidence of continued development of the generating facility to ensure they are prepared to proceed would remain in the cycle, while projects that cannot meet those requirements would have their interconnection requests deemed withdrawn.¹⁸

In contrast, PJM’s current interconnection queue process provides little incentive for speculative projects to exit the queue. In its interconnection reform tariff filing, PJM states that delays arising from sheer volume are exacerbated by the large number of speculative projects that withdraw from the queue.¹⁹ Each withdrawn project entails PJM re-study on lower-queued projects, which delays the processing of new service queues and may have the consequence of a cascade of withdrawals. The Ohio FEA concurs with FERC that conducting a single cluster study and cluster re-study annually may reduce the risk of cascading re-studies occurring if an interconnection customer exits the queue.

¹⁷ *Id.*

¹⁸ NOPR at ¶ 76.

¹⁹ *In re PJM Interconnection, L.L.C.*, Docket No. ER22-2110-000, Tariff Revisions for Interconnection Process Reform, Request for Commission Action by October 3, 2022, and Request for 30-Day Comment Period, at 5.

3. Allocation of Cluster Study Costs

FERC's reform proposals would not change the participant funding mechanisms, although FERC intends to utilize a cluster approach to cost allocation by studying the impact of projects in each cycle in their entirety rather than on an incremental basis. With respect to the shared costs of cluster studies, FERC proposes to allocate "90% of the applicable study costs to interconnection customers on a pro rata basis based on requested MWs included in the applicable cluster, and 10% of the applicable study costs to interconnection customers on a per capita basis based on the number of interconnection requests included in the applicable cluster."²⁰ In addition, under FERC's proposal, project developers within a specific cluster would share network upgrade costs using a proportional impact method.²¹ This methodology aims to allocate network upgrade costs to interconnection customers based on a distribution factor analysis ("DFAX"). FERC believes that this approach will "accurately reflect the level of contribution of an interconnection request to the need for the network upgrade."²² The Ohio FEA maintains that the current practice of assigning to the interconnection customer the cost of any network upgrades needed to facilitate the interconnection of a generating resource is justified and must be continued. Further, we have been on record advocating for the beneficiary-pays approach to cost recovery via the solutions-based, DFAX methodology as it pertains to PJM's high-capacity transmission expansion projects.²³ The Ohio FEA believes that this methodology is just and reasonable. We support FERC's proposed clustered cycle process to the extent that these proposals are consistent with long-recognized regulatory principles of cost allocation.

²⁰ NOPR at ¶ 82.

²¹ NOPR at ¶ 88.

²² *Id.*

²³ *See, e.g.,* Ohio FEA ANOPR Comments at 12.

4. Allocation of Cluster Network Upgrade Costs

With respect to shared network upgrades, FERC has advanced a proposal to allocate costs related to shared network upgrades between customers studied in separate clusters. Under this framework, interconnection customers in later cluster studies that benefit from previously installed network upgrades will partially reimburse the interconnection customer(s) responsible for the original upgrades. More specifically, the Commission proposes that, if a generating facility of an interconnection customer in a later cluster study directly connects either to (1) a network upgrade in-service for less than five years or (2) a substation where the network upgrade in-service for less than five years terminates, then the transmission provider would be required to designate the network upgrade as a shared network upgrade, and the interconnection customer in the later cluster study would be required to contribute a pro rata portion of the shared network upgrade's remaining undepreciated capital cost based on the impact the interconnection customer in the later cluster study has on the network upgrade as measured using the same method the transmission provider used to determine the impact of the interconnection customer(s) in the earlier cluster study.²⁴ If a new generating facility does not connect directly to a network upgrade, FERC proposes to compel transmission providers to perform a power flow study, in order to measure the later-in-time interconnection customer's use of and benefit from the network upgrade funded by interconnection customers from prior cluster studies.²⁵ Subsequently, the transmission owner would distribute the funds to the appropriate interconnection customers initially responsible for funding the network upgrade.²⁶

²⁴ NOPR at ¶ 98.

²⁵ *Id.*

²⁶ NOPR at ¶ 99.

The Ohio FEA acknowledges that interconnection customers in later cluster studies may benefit from previously installed network upgrades funded by interconnection customers in previous cluster studies. However, as states pursue their own public policy goals for power generation, there will inevitably be network upgrades necessitated as a result. The Ohio FEA is wary of a scenario whereby Ohio ratepayers are allocated the costs of network upgrades that would not exist but for the policy preferences of another state. We have voiced our opposition to the socialization of costs for state public policy projects in the PJM footprint many times in past comments to FERC. With that said, we are not opposed to FERC's proposal in this matter if a network upgrade provides a clear and necessary benefit to the transmission system.

5. Increased Financial Commitments and Readiness Requirements

a. Demonstration of Site Control

FERC proposes to revise the pro forma LGIP to require interconnection customers to demonstrate 100 percent site control for their proposed generating facilities when they submit an interconnection request.²⁷ In its ANOPR comments,²⁸ the Ohio FEA pointed out recent Ohio law permitting any Ohio county to adopt a resolution designating all or part of the unincorporated area of the county as an area in which certain renewable resource generation facilities may not be constructed.²⁹ There is no deadline by which counties must take this action. Furthermore, the county can prohibit, on a project by-project basis, the construction of a solar or wind facility or limit the boundaries of such a facility proposed in the county's unincorporated area.³⁰ A 100

²⁷ NOPR at ¶ 116.

²⁸ Ohio FEA ANOPR Comments at 9.

²⁹ Ohio Revised Code 303.58.

³⁰ Ohio Revised Code 303.62.

percent readiness requirement or acreage requirements based on generating technology would, therefore, be problematic for prospective Ohio generators. As an alternative, the Ohio FEA is not opposed to a deposit in lieu of site control only for regulatory limitations such as state or local laws.

b. Commercial Readiness

In the NOPR, the Commission states that, other than a demonstration of site control or a \$10,000 deposit in lieu of site control, the pro forma LGIP does not currently require interconnection customers to demonstrate progress toward achieving commercial readiness throughout the interconnection study process.³¹ FERC proposes to revise the pro forma LGIP to include a commercial readiness framework where the financial requirement in lieu of readiness increases with progressing stages of interconnection.³² The Ohio FEA supports the Commission's proposed mitigation approach for queue withdrawals, given the severe and cascading repercussions of withdrawals.

B. Increasing the Speed of Interconnection Queue Processing

1. Elimination of the Reasonable Efforts Standard

FERC notes that the pro forma LGIP currently requires transmission providers to use reasonable efforts to process interconnection requests in a timely manner and does not include any penalties or financial consequences if a transmission provider fails to meet established deadlines.³³ The Commission, therefore, proposes to revise the pro forma LGIP to eliminate the

³¹ NOPR at ¶ 124.

³² NOPR at ¶ 128.

³³ NOPR at ¶¶ 161-162.

reasonable efforts standard and instead impose firm study deadlines and establish penalties that would apply when transmission providers fail to meet the deadlines.³⁴ Specifically, transmission providers that do not complete a cluster, cluster re-study, facilities, or affected system study by the deadline specified in the pro forma LGIP would be assessed a penalty of \$500 per day that the study is late.³⁵

The Ohio FEA has not been opposed to punitive actions for withdrawals of interconnection requests but has concerns with respect to penalties that would be imposed on the front end of the process (i.e., on transmission providers for study delays). Although FERC states that the proposed penalties would not be recoverable in transmission rates,³⁶ we believe such imposition will inevitably impact ratepayers, and not rightfully so, unless it can be clearly demonstrated that the proposed \$500/day penalty is not passed along to ratepayers. With that being said, the Ohio FEA agrees that firm deadlines and targeted penalties should be considered, subject to the caps and other safeguards proposed in the NOPR.

2. Affected Systems

To improve transparency and coordination between the host transmission system with which a generating facility directly interconnects and any affected system, FERC proposes to revise the pro forma LGIP to include an affected systems study process, which would include initial notification, affected system scoping meeting, study process, cost allocation, study results and assessment, and financial penalties assessment.³⁷ Reliability is a core tenet for the PUCO as it is for FERC. The Ohio FEA believes that inter-regional coordination is imperative to

³⁴ NOPR at ¶ 168.

³⁵ NOPR at ¶ 169.

³⁶ *Id.*

³⁷ NOPR at ¶ 183.

maintaining reliability. Consequentially, the Ohio FEA encourages affected systems study that will enable integration of interconnection studies across seams and aid in the evaluation and sharing of transfer capabilities across regions.

C. Incorporating Technological Advancements into the Interconnection Process

1. Increasing Flexibility in the Generator Interconnection Process

FERC makes several proposals to remove barriers within the interconnection process to increase flexibility and more effectively incorporate technological advancements into the interconnection process. First, FERC seeks to require transmission providers to allow more than one resource to co-locate on a shared site behind a single point of interconnection and share a single interconnection request.³⁸ This proposal would establish procedures enabling co-located resources to access the transmission system. The Ohio FEA supports this reform and believes that it will improve the efficiency of the interconnection process as co-located resources will no longer be studied separately. Also, in this scenario, interconnection studies will be more cost-effective for developers as they will only be required to submit one set of study deposits for both resources.³⁹ These reforms are increasingly relevant, given the proliferation of renewable generation and the fact that many of these resources are paired, such as solar and battery storage. Additionally, the intermittent nature of renewable resources such as solar and wind highlights the importance to reliability of paired battery storage. The Ohio FEA considers the reliability of the electric grid to be of paramount importance and supports measures to enhance the efficiency of interconnection requests made up of multiple generating facilities seeking to co-locate and to share a single point of interconnection.

³⁸ NOPR at ¶ 242.

³⁹ NOPR at ¶ 244.

2. Incorporating Alternative Transmission Technologies into the Generator Interconnection Process

The Commission has identified a retinue of technologies that could be deployed more quickly and at lower cost than traditional network upgrades, but they have lacked much attention from transmission planners and are not currently considered in generator interconnection processes. Technologies include advanced power flow control devices, transmission switching, dynamic line ratings, static synchronous compensators, static volt-ampere reactive compensators, and electric storage in some cases. These grid-enhancing technologies (“GETs”) can improve operations, enhance system reliability, contribute to capacity, and more. Some GETs could provide substantial benefits by resolving thermal overloads and avoiding voltage collapse, among other things. Concerns among transmission providers regarding loss of interconnection queue positions and unrealistic modeling assumptions for advanced technologies and co-located resources have the practical effect of discouraging investments in what may be the most efficient resources and system solutions for customers. This should change.

The Ohio FEA fully supports FERC’s proposal to revise the pro forma LGIP and pro forma SGIP to require that transmission providers, upon request of an interconnection customer, evaluate and determine the feasibility of requested alternative transmission solutions.⁴⁰ We support this evaluation – whether it is for one, more than one, or all GETs of interest to the interconnection customer, and whether it is for temporary or permanent service on the grid. Storage, in our opinion, should be included among interconnection customers’ potential options.

⁴⁰ NOPR at ¶ 297.

As to modeling assumptions, the Ohio FEA assumes some changes would be required to address unique attributes of GETs that may be overlooked by existing frameworks. The cost and duration of modeling and evaluations would be best addressed by transmission providers in concert with interconnection customers. We suggest that those parties also mutually determine an appropriate number of evaluations for GETs projects.

3. Modeling and Performance Requirements for Non-Synchronous Generating Facilities

The increased penetration of renewable and electric storage resources has caused FERC to re-evaluate various aspects of the pro forma LGIP and pro forma SGIP with regard to modeling and performance requirements. One issue that FERC has identified is the discrepancy between modeling and performance requirements for synchronous and non-synchronous generating facilities. As FERC stated in a previous rulemaking, non-synchronous generating facilities are “connected to the bulk power system through power electronics, but do not produce power at system frequency (60 Hz).”⁴¹ Examples of non-synchronous generators include solar PV, wind, fuel cells, and battery storage. FERC explains that non-synchronous generators utilize “grid-following inverters,” which react rapidly to changes in transmission system conditions.⁴² These inverters, if not properly programmed to respond to these changes, “may fail to ride through a system disturbance * * * by tripping or entering momentary cessation mode.”⁴³ To remedy this issue, FERC proposes to require new larger generating facilities to ride through abnormal frequency and voltage conditions and expand the definition of “ride-through” to include

⁴¹ *Reactive Power Requirements for Non-Synchronous Generation*, Order No. 827, 155 FERC ¶ 61,277 (2016).

⁴² NOPR at ¶ 309.

⁴³ *Id.*

the ability of a large generating facility to stay connected to and synchronized with the transmission system during system disturbances within under-voltage and over-voltage conditions, as well as under-frequency and over-frequency conditions.⁴⁴ Additionally, FERC notes that there is no requirement in the pro forma LGIP and pro forma SGIP to require interconnection customers that are developing non-synchronous generating facilities to provide accurate and validated models.⁴⁵ FERC proposes to require that interconnection customers provide accurate and validated modeling data for these facilities, in order to properly identify the appropriate network upgrades required.⁴⁶

The Ohio FEA supports these measures to expand modeling and performance requirements for non-synchronous generators. As we have noted, increased numbers of non-synchronous generators will attempt to interconnect to the bulk power system in the coming years. It is vital that there are measures in place to handle the challenges that accompany these resources and to maintain reliability. We believe that these measures will be a step toward safely and effectively integrating these resources onto the grid.

III. CONCLUSION

The Commission is facing present and future challenges as it grapples with generator interconnection reform. FERC measures to address more efficient queue processing, improve cost and timing certainty, and require consideration of grid-enhancing technologies are necessary and may expedite recovery from the backlog in the interconnection queues. As addressed in

⁴⁴ NOPR at ¶ 336.

⁴⁵ NOPR at ¶ 318.

⁴⁶ NOPR at ¶ 328.

these comments, the Ohio FEA generally supports the Commission's proposals. At the same time, we urge FERC to not delay in acting on PJM's interconnection reform tariff proposal.

Respectfully submitted,

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On Behalf of the Federal Energy Advocate
The Public Utilities Commission of Ohio

October 13, 2022

CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused a copy of the foregoing document to be served on each person included on the official service list maintained for this proceeding by the Commission's Secretary, by electronic mail or such other means as a party may have requested, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010. Dated this the 13th day of October 2022, at Columbus, Ohio.

/s/ Thomas G. Lindgren
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Assistant Attorney General

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