

An Empirical Analysis of the Interconnection Queue*

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Abstract

Generators applying to connect to the U.S. power grid go through an interconnection queue. Most wind and solar generators that begin the process do not complete it. Using new data, we find that a long queue delays the necessary engineering studies, and high interconnection costs cause generators to withdraw from the queue. We develop and estimate a dynamic model of the queue and quantify the effects of policy reforms. We find that a per generator fee to enter the queue can increase completed capacity by reducing congestion.

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1 Introduction

Electricity production accounted for over a quarter of both U.S. and global carbon emissions in 2021 (CBO, 2022; IEA, 2022*a,b*). Many countries’ climate goals center on transitioning to a low carbon electricity grid while simultaneously electrifying heating and transportation. Meeting these goals will require massive investment in wind and solar powered generators.

Yet, connecting an electricity generator to the U.S. power grid is increasingly difficult. The process, known as interconnection, takes several years. It can also be costly: connecting generators must often pay to upgrade the transmission infrastructure because the local grid is at capacity (Plumer, 2023). Renewable energy developers cite interconnection as the single biggest hurdle they face (Driscoll, 2022), and less than a quarter of the wind and solar generators that start the process complete it (Rand et al., 2021). We study the design of this interconnection process.

Interconnection works as follows. A generator wishing to connect to the transmission grid joins a waitlist known as the interconnection queue. The grid operator then conducts a series of engineering studies to determine whether the new generator will overload the grid, and, if so, the cost of the new equipment, such as transmission lines, that is necessary to resolve the overload (“interconnection cost”). The grid operator studies generators in the queue on a first-come, first-served basis. Generators in the queue must pay for the studies to remain in the queue and can drop out at any time. A generator usually needs three studies to arrive at a final cost. After the final study, the generator can connect by paying the interconnection cost, or it can leave the queue.

From an economic perspective, the current queuing process is far from optimal. Priority is by entry date, but the probability of completion is significantly different across generators with the same final interconnection cost. Thus, while grid operators struggle to keep up with an influx of interconnection requests from renewables, many studies are done for generators with low probabilities of completion. The cost of being in the queue is also low and may be insufficient to offset the congestion externality imposed on other generators.

We use novel data to study the design of this process. We hand collect these data for the PJM, the largest of the U.S. regional grid operators. PJM serves 65 million people in parts of the Mid-Atlantic, Midwest, and Southern United States (PJM, 2021*b*). Our data cover all generator interconnection requests from 2008 through 2020: 4,085 requests and the 7,117 engineering studies for these requests.

Generator complaints about delayed studies and high interconnection costs are borne out

in the data. We find that the necessary studies often take far longer than PJM's official timeline, with the later studies being the most delayed. For example, PJM expects the third and final interconnection study to take 6 months, but the median wait in the data is 16 months, and the ninetieth percentile is 35 months. While the median interconnection costs are \$0.05 million per MW, the 90th percentile is \$0.41 million per megawatt, roughly a quarter of the installation cost for wind and solar generators. We also find that observably similar generators can have very different interconnection costs, a finding consistent with project developers' complaints that these costs are unpredictable (Caspary et al., 2021). Finally, wind and solar generators have higher interconnection costs on a per MW basis.

We also show that high interconnection costs cause generators to withdraw from the queue. After every study, generators with high interconnection costs are more likely to withdraw from the queue. For example, a generator with a second study interconnection cost above 0.1 million per megawatt (33 percent of generators) is 49 percent more likely to withdraw from the queue prior to receiving the third study. We find similar results when we control for distance to the grid connection point, a proxy for permitting difficulties, and when we instrument for interconnection costs with the difference in costs across studies.

We next quantify three potential externalities in the queue. The first is a congestion externality: are the necessary engineering studies returned more slowly when more generators are ahead in the queue? The next is a geographic cost externality: do costly completed interconnections reduce interconnection costs for future generators in the same location? The third is a local output externality: do completed interconnections reduce local wholesale electricity prices and thus the expected profits of nearby generators in the queue?

We find that the congestion externality is quantitatively important, while the other two externalities are not. We use variation in a generator's queue position to find that a 10 percent increase in the number of higher queued generators reduces a generator's probability of receiving the third and final study by 5 percent, on average. Conversely, we do not find evidence that costly completed interconnections reduce costs for the generators that follow. Similarly, using a staggered difference-in-difference estimator, we find a new generator beginning operation does not reduce wholesale prices in its location relative to other locations in PJM.

We then develop an empirical model of the queue to study this externality and quantify the effects of policy reforms. We model withdrawal decisions as an optimal stopping problem. A generator waits in the queue for the necessary studies and forms beliefs about when

the next study will arrive and what its interconnection cost estimate will be. The continuation value of a generator depends on its characteristics and the status of the queue. We also develop a tractable queuing equilibrium concept that accommodates the non-stationarity in the data.

We estimate the model in two steps. First, we use a rich set of generator and queue characteristics to jointly model the arrival of new studies and the update of interconnection costs. These estimates allow us to construct generator beliefs. Second, we embed these beliefs in the generator's optimal stopping problem, and use the observed withdrawal decisions and the dynamic model of queuing to recover the waiting cost and payoff for completing interconnection. The generator's decision to begin operation after receiving its final interconnection cost helps to identify the payoff function. Interim interconnection cost estimates in prior studies shift generator expectations of the final cost and help to identify the waiting costs.

Using the estimated model, we first consider a thought experiment where we speed up the queue. Holding entry fixed, a 10 percent increase in the study arrival probability increases total completed capacity by 4.0 GW, or 5.3 percent. Renewable capacity increases by 1.6 GW, or 4.6 percent. Reducing waiting not only reduces a generator's waiting cost, such as the cost of leasing land, but also reduces exposure to other causes of withdrawals, such as the expiration of signed long term contracts. This large increase in completed capacity motivates potential gains from modifying the queuing mechanism to reduce congestion.

In another thought experiment, we fix the grid operator's capacity to process studies and instead ask whether changing the way generators are prioritized can increase completed capacity. Specifically, we solve for an alternative queuing mechanism that excludes a set of generators from the queue to maximize completed capacity. This mechanism removes a large share of generators below 100 megawatts in size. By facilitating the completion of larger generators, this mechanism increases completed capacity by 7.9 GW, of which 1.5 GW is renewable. If we value renewable capacity three times as much as non-renewable capacity, we can increase completed capacity by 4.1 GW, of which 2.7 GW is renewable.

We next consider reforms that address this congestion externality by increasing the costs of entering and staying in the queue. We first consider a flat entry fee, which screens out small generators. We find that an entry fee of 900,000 dollars per generator maximizes the completed capacity, adding 6.9 GW of capacity, of which 0.8 GW is renewable. This policy also removes many more small generators than the queuing mechanisms we considered above. We next consider a per MW entry fee that scales linearly with the size of the generator. We

find this fee can also increase capacity, but the increase is much smaller, and this type of entry fee alone cannot increase renewable capacity. Finally, we find that increasing the fee to request later studies does not increase completed capacity.

These reforms can have important climate impacts. Using the U.S. Environmental Protection Agency's Avoided Emissions and Generation Tool (AVERT), we calculate the avoided carbon emissions from the added renewable capacity. At a social cost of carbon of \$185 per ton, the implied annual benefit of 0.8 GW of added renewable capacity is over 200 million dollars per year.

Related Literature

In this paper, we study electricity transmission policy and formally account for the effects of interconnection queues. Although the interconnection process is a key step in entering the electricity market and has received some attention in research on energy policies (e.g., Gergen, Cannon Jr and Torgerson (2008); Alagappan, Orans and Woo (2011)), it has been rarely studied in the economics literature, likely due to a lack of data. In a related paper, Gonzales, Ito and Reguant (2022) study how the expansion of the transmission grid enables the entry of renewables. More broadly, in considering the economic implications of electricity transmission policy, this paper relates to papers studying the effects of transmission constraints on competition, emissions, renewable energy investment, and allocative efficiency (Wolak, 2015; Ryan, 2021; Davis and Hausman, 2016; Fell, Kaffine and Novan, 2021; LaRiviere and Lyu, 2022; Doshi, 2022; Hausman, 2024).

We also contribute to the literature on how public policy affects investment in renewable energy (see, e.g., Metcalf (2010); Hitaj (2013); Johnston (2019); Aldy, Gerarden and Sweeney (2023); Deschenes, Malloy and McDonald (2023)). More broadly, there are a number of papers in the energy and environmental literature that study investment and industry dynamics (Ryan, 2012; Gowrisankaran, Reynolds and Samano, 2016; Fowlie, Reguant and Ryan, 2016; Blundell, Gowrisankaran and Langer, 2020; Butters, Dorsey and Gowrisankaran, 2021; Elliott, 2021; Gowrisankaran, Langer and Zhang, 2022; Abito et al., 2022; Covert and Sweeney, 2022; Davis, Holladay and Sims, 2022; Leisten and Vreugdenhil, 2023). The cited papers are unified in focusing on how environmental regulations interact with dynamic incentives in equilibrium.

Our study uses data from PJM, the largest U.S. transmission organization by the number of customers served. A number of papers (e.g., Mansur (2007, 2008); Bushnell, Mansur and

Saravia (2008); Allcott (2012); Buchsbaum et al. (2022)) also use data from PJM but focus on market structure issues, while Linn and McCormack (2019) study exit by coal-fired power plants.

Finally, we contribute to the empirical literature on dynamic assignment mechanisms (e.g. Agarwal et al. (2021); Waldinger (2021); Verdier and Reeling (2021); Liu, Wan and Yang (2024)) by studying a queuing problem in a novel and important market. We develop a tractable queuing equilibrium concept for a non-stationary environment. Our equilibrium concept is similar to Weintraub et al. (2010), and we use a finite horizon assumption to capture the non-stationarity in the data (Igami, 2017; Yang, 2020). To understand the equilibrium effects of congestion, we solve for alternative queuing mechanisms that maximize various planner objectives (Che and Tercieux, 2021).

2 PJM Interconnection Process

We first describe how PJM manages the interconnection process in more detail. The two main types of participants are developers and transmission owners. Developers (e.g., NextEra Energy) enter their generators (e.g., 2.5MW Front Royal Solar Field in Virginia) in the queue and pay the interconnection costs identified in the studies. These developers can be either independent producers (more common for renewable) or regulated utilities (more common for natural gas).

Transmission owners conduct the interconnection studies and construct the upgrades (Connell and McGill, 2020).¹ They are regulated utilities, and we assume they do not exercise market power, i.e., they charge the cost of upgrades in a competitive factor market.²

¹While new generators pay for transmission network upgrades through the interconnection process, other transmission investment is planned by the grid operator. In PJM, this transmission planning process is called RTEP, which stands for regional transmission expansion plan. The primary goal of the RTEP is to maintain reliability (PJM, 2021*d*). At a high-level, the two types of transmission investment are substitutes, but they are funded differently. Connecting generators pay for the network upgrades they trigger through the interconnection process. In contrast, electricity consumers pay for RTEP investment via higher transmission rates (PJM, 2021*d*). In our analysis, we treat RTEP investment as fixed. Twenty-seven billion dollars worth of RTEP investment was completed from 2008-2020 (PJM, 2023). Locations with recent RTEP investment are associated with increased entry and a moderate decrease in interconnection costs (Table E.2). While generator entry responds to RTEP, the RTEP process does not consider generators waiting in the queue or try to anticipate entry by generators (PJM, 2021*d*). More generally, larger-scale transmission infrastructure is challenging to build due to difficulties surrounding siting and permitting, overlapping jurisdictions, and cost allocation (Davis, Hausman and Rose, 2023).

²The transmission owner does not profit from this investment because upgrades paid for by connecting generators do not go into its rate base.

2.1 Entering the Queue

To enter a generator in the interconnection process, a developer must secure land sufficient to build the generator (PJM, 2021f). Developers must also pay a deposit to enter the queue or move on to the next stage. The deposit amount depends on the generator size and stage, with larger generators and later studies typically requiring higher deposits. For the median generator size of 20 MW, the three deposits would be 12,000, 10,000 and 50,000 dollars. Generators that withdraw have their deposit returned, less a 10 percent non-refundable portion and any study costs already incurred (PJM, 2021c).

2.2 Queuing Rules

Generators can enter the queue at any time, but each year is divided into two windows. Generators that enter in the same 6-month window are put in the same cohort and will receive up to three studies (feasibility, system impact, and facility study) sequentially. Through these studies, generators learn increasingly accurate information about the costs of interconnection. To receive the next study, a generator must incur a cost, but it can freely leave the queue at any time. PJM may require just one or two studies if it determines that a generator is not required to make significant network upgrades or share costs with other generators. After the last study is issued, the generator chooses to leave the queue or sign an interconnection service agreement in which it agrees to pay the final interconnection cost, thus completing the interconnection process.

The official timeline for the interconnection process is quite rigid. For generators that apply within the same time window, PJM starts conducting the first studies (feasibility studies) one month after the closing of the window. Within three months, generators are supposed to receive their first studies. At this point, generators have another month to decide whether to advance to the second study (system impact study). The second study then takes four months, at which point generators have one month to decide whether to request the third and final study (facility study). The third study takes 6 months. Finally, generators and PJM agree on final details and sign the interconnection service agreement, over a 6.5-month period (PJM, 2021a).³

Despite this timeline, significant delays in delivering studies can occur due to the number of backlogged interconnection requests and a lack of staff capacity (Shoemaker, 2021). Upon

³This agreement also sets a commercial operation date. After signing the interconnection service agreement, the generator may suspend the process for up to 3 years (up to 1 year if the suspension has a negative impact on subsequent generators), though these suspensions are rare (PJM, 2021e).

receiving a study, a generator has approximately one month to decide whether to pay the deposit to request the next study, but it has little control over when the transmission organization delivers the study. A solar developer in PJM recently lodged a complaint with Federal Energy Regulatory Commission (FERC) after waiting more than two years for the second study (Hale, 2021).

2.3 Timing of Interconnection within Project Development

Generators apply for interconnection early in project development. After a developer secures the land for the generator, the permitting and interconnection process occur simultaneously. Compared to permitting, interconnection delays and costs are perceived as the more important hurdle (RechargeNews (2021); Collier (2021)). Renewable energy generators sign long term contracts to sell the power while in the queue or once the interconnection process is completed. After the long term contract and interconnection service agreements are signed, the physical generator and interconnection facilities are constructed. This construction typically takes less than a year, far shorter than the time the generator spends in the queue.⁴

A slow interconnection process can adversely impact other steps in project development. Power buyers are willing to sign long term contracts a few years before a generator begins operation, but developers must apply for interconnection much earlier. Developers are thus left trying to forecast demand a few years in advance and enter generators into the queue accordingly. There have also been cases where developers with long term contracts are unable to begin operation as planned because they are still waiting for interconnection. A long wait may also cause a developer's option to lease to expire, prompting the developer to relinquish site control or renegotiate with landowners.

2.4 Proposed Reforms

There have been several recent efforts to reform the interconnection process, which a key regulator described as in "chaos" (Potter, 2021). In 2023, the Federal Energy Regulatory Commission (FERC), the federal regulator overseeing U.S. transmission policy, approved new rules governing the interconnection process. Broadly, the new rules try to transition interconnection queue priority from "first-come, first-served" to "first-ready, first-served". The rules increase the cost for generators to enter and remain in the queue, move from separate studies for

⁴This timeline is based on the timeline for a wind generator in AWEA (2019); wind and solar generators follow similar timelines.

each generator to studying several proposed generators together, and penalize transmission owners for delays in completing studies (Hale and Christian, 2023).

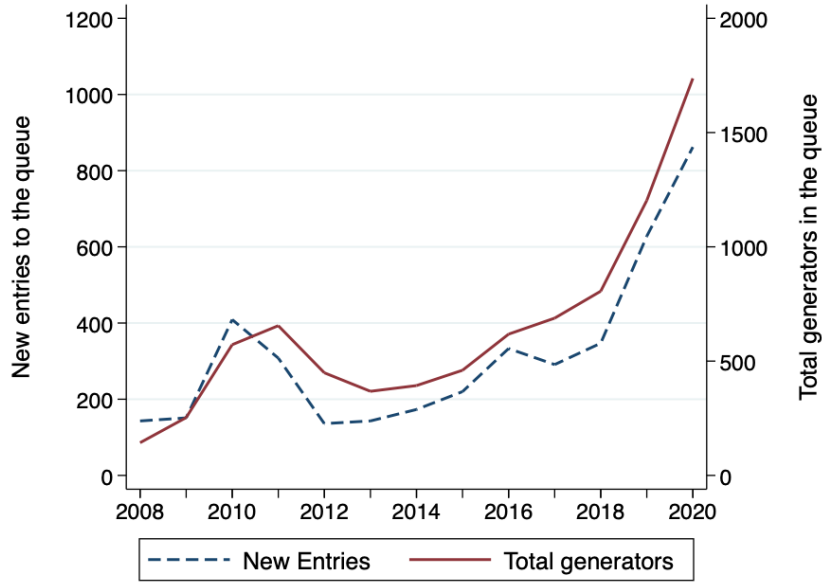
PJM plans to implement reforms consistent with FERC’s proposed new rules. PJM plans to increase the cost of entry and requesting later studies, penalize withdrawals from the queue, and penalize transmission owners for delays in study delivery (PJM, 2022). PJM transmission owners will group generators into large clusters and study all generators in a cluster jointly, issuing each study at the cluster level rather than the generator level.

Table 1: Summary Statistics

	Study 1		Study 2		Study 3	
	Mean	Std. Dev.	Mean	Std. Dev.	Mean	Std. Dev.
Cost per MW	0.12	0.40	0.18	0.48	0.10	0.16
Wait time (mos.)	5.3	2.7	12.7	11.3	19.0	13.0
Size in MW	97	196	106	191	162	276
Uprate	0.21	0.41	0.23	0.42	0.16	0.37
Solar	0.60	0.49	0.60	0.49	0.59	0.49
Natural Gas	0.17	0.37	0.16	0.36	0.22	0.42
Wind	0.09	0.29	0.10	0.30	0.12	0.32
Battery	0.10	0.30	0.10	0.30	0.04	0.19
Coal, oil, diesel	0.02	0.13	0.01	0.12	0.01	0.09
Other	0.03	0.18	0.03	0.17	0.02	0.15
Cost sharing	0.04	0.19	0.60	0.49	0.60	0.49
Study 1 cost sharing	0.42	0.49	0.48	0.50	0.45	0.50
Receive engr. tests	0.82	0.39	0.88	0.32	0.04	0.21
Distance to substation (km)	3.81	5.99	3.71	6.18	3.40	5.17
Ordinance	0.28	0.45	0.31	0.46	0.30	0.46
N	4,083		2,433		672	

Generators entering the queue in 2008-2020. Costs in millions of 2020 dollars. Cost per MW is interconnection cost estimate divided by the generator’s size in MW. Wait time for Study 1 is wait in months for the first study after joining the queue. Wait time for Study 2 is wait in months for second study after receiving the first study. Wait time for Study 3 is wait in months for third study after receiving the second study. Uprate is an indicator for a capacity increase to an existing generator. Cost sharing is an indicator for if a generator shares costs with other generators. Study 1 cost sharing is an indicator for if the first study mentions shared network upgrade costs. Receive engr. tests is an indicator for receiving any of three engineering tests: generator deliverability, multiple facility contingency, and short circuit analysis. Distance to substation is the distance to the nearest substation in km. Ordinance is an indicator for a local ordinance restricting renewable energy development.

Figure 1: Queue Size Over Time



Solid red line is annual avg. number of generators in the queue (measured from entry to final study receipt or withdrawal). Dotted blue line is total number of new entries to the queue by year.

3 Interconnection Request Data

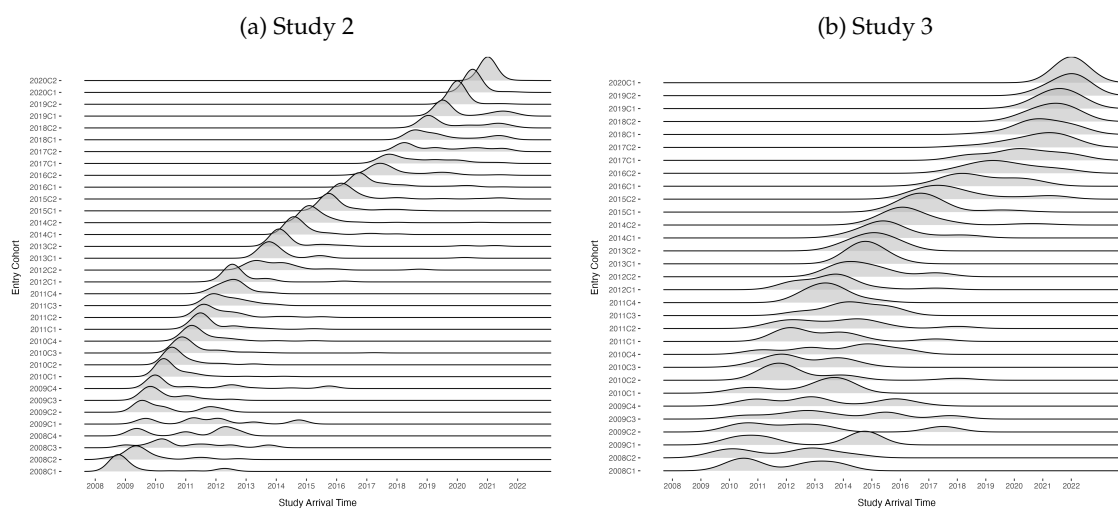
Our main data are based on the 4,085 interconnection requests in PJM from 2008 to 2020. These data come from pdfs of 7,117 engineering studies done as part of the interconnection process. Because the formats are irregular, we hand collect these data. We start our sample in 2008 because data before 2008 have even more irregular formats, making it hard to identify the relevant costs. Summary statistics are presented in Table 1 and Appendix Table E.1.

The PJM queue is dominated by requests for solar, natural gas, and wind generators. These three fuels accounted for 82 percent of interconnection requests from 2008-2020. Natural gas generators tend to be much larger than wind and solar generators; they account for 14 percent of requests but 40 percent of requested capacity. Appendix Figure E.1 shows the proportion of new requests by fuel type in each of our sample years. In the rest of the paper, we refer to wind and solar generators as “renewable”, and the rest as “non-renewable”.

The number of interconnection requests has increased over time. Figure 1 shows both the number of new interconnection requests each year (dotted line) and the average number of generators in the queue by year (solid line).⁵ Requests increased dramatically starting in

⁵The queue size is based on the queue and withdrawal dates for all generators queued between 1997 and 2020.

Figure 2: Study Arrival Times by Date of Queue Entry



Panel (a) shows the distribution of arrival dates for the second study by entry cohort. Panel (b) shows the distribution of arrival dates for the third study by entry cohort.

2015. This increase was driven by renewable generators. Because renewables are smaller on average, the increase in requested capacity was less pronounced: the capacity of new requests in 2008 was 42 GW compared to 69 GW in 2020.⁶

3.1 Waiting times

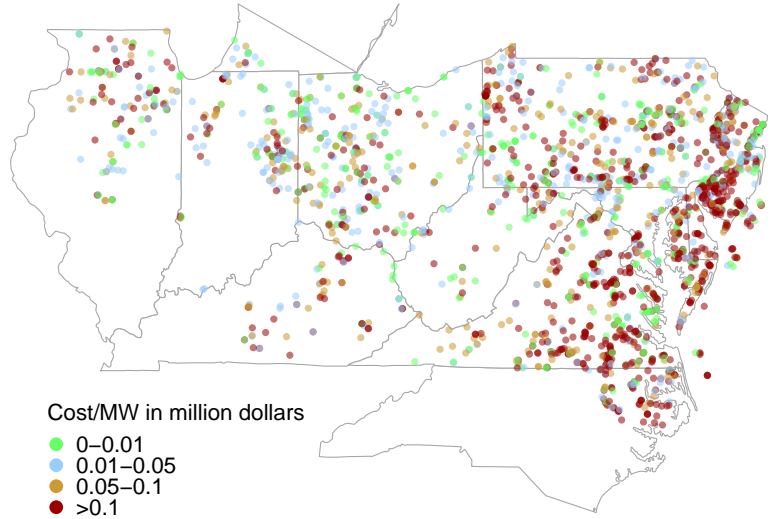
The official timeline is that the studies should take no more than 3, 4, and 6 months. Over three quarters of generators receive the first study within 6 months. The second study's arrival time is more variable; the mean wait time is 10 months with a standard deviation of 7 months. Finally, the mean wait for the third study is 15 months with a standard deviation of 9 months. The mean waiting time to receive the terminal study is 24 months.

While priority is by entry cohort, study arrival is stochastic. Figure 2 plots the distribution of arrival time of studies by entry cohort. Cohorts that entered the queue earlier are more likely to receive a study than generators in later cohorts that are waiting for the same study, but this is not guaranteed. Time spent in the queue increased over our sample, though not as dramatically as the number of generators. The mean wait time from entering the queue to receiving the terminal study was 20 months for generators queuing in 2008-2012 compared to 27 months for those queuing in 2013-2017.⁷

⁶The spike in 2010 was due to an influx of solar generators. The likely cause was a temporary program that offered the federal investment tax credit for solar investment as a cash grant rather than a nonrefundable tax credit (Aldy, Gerarden and Sweeney, 2023).

⁷One reason wait times are variable is that these studies sometimes need to be revised. For example, 19

Figure 3: Costs by Location



Second study interconnection cost estimates by location. Costs in millions of 2020 dollars per MW.

3.2 Interconnection Costs

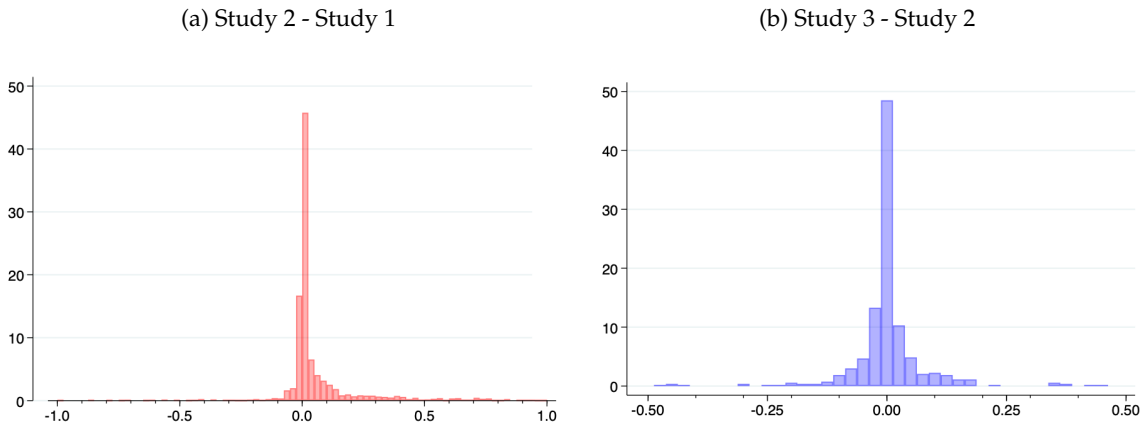
Interconnection costs are often comprised of two components: the direct cost to connect the production facility to the grid, and the indirect cost of upgrading the network to avoid an overload. Both components may require building or upgrading lines, circuit breakers, and even a substation. PJM expressly states in studies that the interconnection costs do not consider permitting costs or rights of way. The first study (feasibility study) does only some of the required engineering tests. This study reports preliminary direct interconnection costs and whether the generator may share costs with other generators using common transmission infrastructure. The second study completes the remaining engineering tests, updates the direct interconnection costs, and reports the network upgrade costs. A generator may be solely responsible for network upgrades or share this cost with other generators. The third study details the engineering specification of all upgrades and provides a final update to the costs.

While the median interconnection cost estimate is close to zero, the cost distribution is right skewed. We use cost per megawatt (MW) as our measure of cost.⁸ For the second study,

percent of generators in our sample had their second study revised. Revisions can be due to the connecting generator changing its request or nearby generators dropping out of the queue. We will model the arrival of the final version of each study, not the intervening versions which are not always posted by PJM.

⁸There do not appear to be economies of scale for moderately sized generators. For generators from the 10th to 90th percentile in size, a 1 standard deviation increase in capacity is associated with 0.05 standard deviation decrease in the second study interconnection cost.

Figure 4: Differences in Cost Estimates across Studies Within A Generator (\$Million/MW)



Panel (a) shows a histogram of the difference in the first and second study interconnection cost estimates for generators queuing from 2011-2020 that received study 2. $N = 2,023$; 50 generators with cost differences above 1 in magnitude excluded. Panel (b) shows a histogram of the difference in the second and third study interconnection cost estimates for generators queuing from 2011-2020 that received study 3. $N = 479$; 3 generators with cost differences above 0.5 in magnitude excluded. Y-axis is the percent of observations in each bin. Costs are in millions of 2020 dollars per MW.

thirty percent of generators have interconnection costs less than 0.01 million per MW. Yet, the 75th percentile of the cost distribution is 0.15 million per MW and the 90th percentile is 0.42 million per MW. For comparison, installation costs for wind and solar generators are roughly 1.5 million per MW. The median interconnection cost per MW is also higher for renewables (0.08 vs. 0.02).

3.2.1 Interconnection Costs are Hard to Predict

There are several sources of uncertainty about interconnection costs. First, although a developer may be able to use engineering models to identify whether an interconnection will cause instability, it is hard to predict what remedies a transmission owner will require and the cost of these remedies, according to our interview with an industry expert. Second, the withdrawal of other generators sharing the cost of a network upgrade changes a generator's cost. After withdrawals, PJM may still require the upgrade, so the remaining generators' share of its cost increases. If PJM no longer requires the upgrade, the cost for the remaining generators will decrease. Third, due to the long waiting time, technologies like solar inverters evolve, and a developer may need to change the production equipment, causing the grid operator to reevaluate the generator and assess a different cost.

Observable generator characteristics explain some but far from all of the variation in inter-

connection costs. Appendix Table E.2 shows that a regression of having a low second study interconnection cost on characteristics such as size, state, fuel type, and year of entry has an R^2 of 0.41. Geography also does not explain much of this variation. Figure 3 plots the location of generators with study 2 cost estimates.⁹ More generators are clustered along the more populated east coast. These generators have higher interconnection cost estimates, on average, but interconnection costs can vary substantially in the same geographic area, even within fuel type.¹⁰

We next show that changes in costs across studies are also hard to predict. Figure 4 shows that interconnection costs for the same generator do not systematically decrease across studies.¹¹ This pattern suggests that cost changes are not anticipated. If developers were able to predict how a generator's interconnection cost would evolve across studies, we would expect selection on this difference. Appendix Figure E.2 also shows that generators disproportionately withdraw from the queue in the two months after receiving a study, which suggests the studies provide new information.

3.2.2 High Interconnection Costs Lead to Withdrawals

We next test whether generators with high interconnection costs are more likely to withdraw from the queue. Specifically, we regress an indicator for withdrawing from the queue on an indicator for having a high (above 0.1 million per MW) interconnection cost. We define withdrawing as leaving the queue before the next study arrives, or before beginning operation for generators that have received their final study.

Across all three studies, we find that generators with a high interconnection cost estimate are more likely to withdraw from the queue (Table 2). For the first study, the OLS estimates in the first column imply that having a high interconnection cost is associated with an increase in the probability of withdrawal of 12 percentage points, or 44% at the mean withdrawal rate. The estimated effect is similarly large for other studies.¹²

We find similar estimates when we instrument for costs with the change in these costs across studies. Generators may have private information about costs. The resulting selection

⁹We focus on costs from the second study because the first study does not typically indicate a generator's contribution to shared network upgrade costs (see Appendix A for more detail and an example of the information available in the first study). This is a selected sample because generators with high interconnection costs are more likely to drop out after the first study.

¹⁰We observe a similar pattern when plotting the residuals after regressing costs on generator characteristics.

¹¹Costs on average increase from the first to the second study because the second study includes the contribution to shared costs. For generators that do not share costs, the distribution of this cost difference is symmetric around zero.

¹²Our result is robust to using a continuous measure of costs or more cost bins (Appendix Table E.3).

Table 2: Interconnection Costs on Probability of Withdrawing from the Queue

	Study 1		Study 2			Study 3	
	OLS	OLS	OLS	IV	IV	OLS	IV
Cost above 0.1m/MW	0.123*** (0.022)	0.123*** (0.022)	0.231*** (0.031)	0.293*** (0.054)	0.241*** (0.057)	0.113* (0.063)	0.074 (0.117)
Study 1 cost sharing		0.018 (0.020)			0.106*** (0.033)		
Log total for sharing		0.015*** (0.005)			0.020** (0.009)		
Mean of dependent var.	0.28	0.28	0.43	0.43	0.43	0.55	0.55
F-statistic (instrument)			972		808		202
N	3,191	3,191	1,269	1,269	1,269	345	345

Generators queuing from 2011-2020; generators still active excluded. SEs in parentheses; clustered by substation. Dep. var. are indicators for projects withdrawing from the queue before receiving the next study or before beginning operation for generators with their final study. Cost above 0.1m/MW indicates if that study's interconnection cost estimate is above 0.1 million dollars per MW. Study 1 cost sharing indicates if the first study mentions shared network upgrade costs. Log total for sharing is the log of the total costs to be shared listed in Study 1 for generators with cost sharing. IV results instrument for having a high cost using the change in having a high cost across studies. All specifications control for size (5 bins), fuel type, state, uprate, and FE for the year of queue entry and the year the study is issued. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

would attenuate the relationship between interconnection costs and withdrawals. To address this concern, we instrument for current interconnection costs with the innovation to these costs, i.e., the difference between the current cost and the cost in the previous study. This instrument is valid because changes in interconnection costs across studies are hard to predict (Section 3.2.1). For the effect of the second study costs on withdrawals, the IV estimates are similar to the OLS estimate and statistically significant. For the effect of third study costs, the IV estimate is positive and similar in magnitude but not precisely estimated.¹³

3.3 Speculative Interconnection Requests

Requests for interconnection are inexpensive and have a high option value, so developers enter many more requests than the number of generators they expect to build. This phenomenon is commonly referred to as speculative interconnection requests. We take this behavior to mean that most potential generators were entered into the queue during the period

¹³In Appendix Table E.4, we also find these effects are not driven by permitting difficulties. Specifically, we show they are robust to including controls for whether the county has an ordinance restricting the siting of renewables and the distance to the point of interconnection.

we study.¹⁴

To understand whether strategic interactions are important, we collect data on the identities of developers. The name of the developer is listed in the studies starting with the second study. This name is often the limited liability corporation that owns the generator (e.g., “7 Bridges Solar, LLC”), and we use local news articles, regulatory documents, and developer websites to match each generator to its developer (e.g., “Longroad Energy”). Of the generators in our data, we are able to identify the developer for 39% overall, 52% that reached study 2, and 81% that reached study 3.

These data show that concentration is low. We match 1,574 generators to 383 unique developers, and the largest developer (“Invenergy”) accounts for only 5.0% of these generators. This lack of concentration suggests that strategic interactions may be less important in this setting.

We next turn to the question of whether developers are submitting multiple interconnection requests with the intention of building only one generator. Our data suggest that modeling the generator’s rather than the firm’s problem is a good approximation. For cases where a developer had more than one generator in an entry cohort, either all or none of the generators were completed 71% of the time. Appendix Table E.6 reports this same fraction for the top 15 developers in our sample. Overall, we view these data as generally consistent with developers being willing to build all generators that are individually profitable.

4 Externalities in the Queue

We next discuss and quantify three externalities that may be present in the queue: a congestion externality, a geographic cost externality, and a local output externality. We find that the congestion externality is the most important.

¹⁴There is some debate about the quality of the marginal entries into the queue. The following quote sums up the perspective that these entries are potentially viable projects:

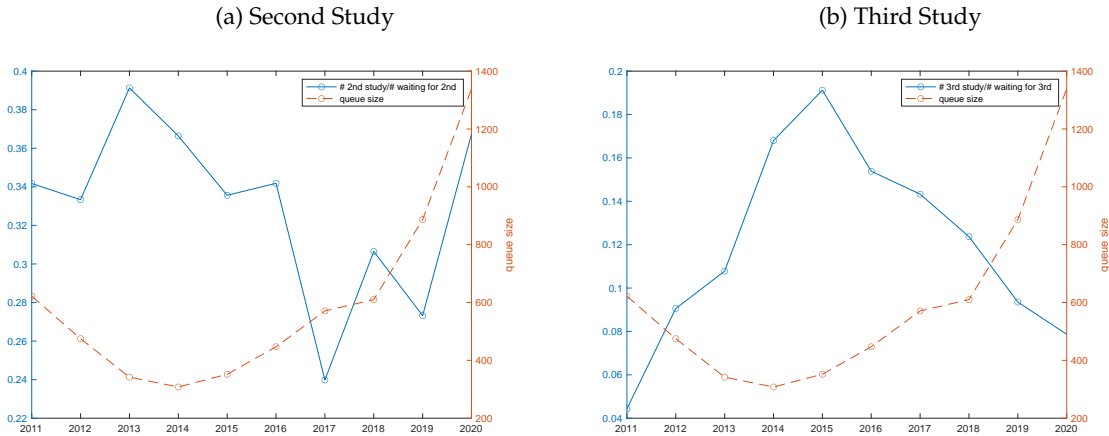
Maybe there are some people who carpet bomb the queues with speculative projects, but I think in general they appear to be speculative because people know it’s going to take five years to get through the process, so you have to do that early on. It would be unwise to fully develop your site prior to entering a queue that you have no certainty on getting through, especially because so many things can change in five years.- Boone Staples, director of transmission analysis at Tenaska (Penrod, 2022)

Another perspective is that these marginal requests are not viable; for example, FERC says its 2023 reforms will “discourage speculative, commercially non-viable interconnection requests” FERC Staff (2023). This concern may be especially relevant for requests put in by firms that have not previously developed projects, though we note that developers with projects in the queue can and do sell these projects to other developers.

4.1 Congestion Externality

We first quantify whether a generator with a low queue position, i.e., with many generators ahead of it, receives studies more slowly. Before formally estimating these effects, we look at the how the probability of arrival varies with the number of generators waiting. The left panel of Figure 5 plots the fraction of generators waiting for the second study that receive it by quarter in blue. The right panel does the same for the third study. Both figures plot the queue size in red. The arrival probability of the second study declines starting in 2017 but reverts to the 2011 level in 2020 despite a large queue. In contrast, the third study’s arrival probability falls when the queue size increases.

Figure 5: Queue Size and Study Arrival



Panel (a) blue line shows annual proportion of generators waiting for the second study that receive it. Panel (b) shows annual proportion of generators waiting for the third study that receive it. Red lines show avg. number of generators in the queue by year (from first study receipt to final study receipt or withdrawal).

We next formally estimate the study arrival process to quantify this congestion externality. We estimate a flexible probit model of study arrival conditional on a generator’s queue position and characteristics.¹⁵ The coefficient of interest is the one on queue position, and we allow this coefficient to vary with whether the generator is waiting for the second or third study. We include time fixed effects (in three year bins) to account for how PJM’s process is slowly changing over our sample.

The identifying assumption is that a generator’s decision to withdraw is conditionally independent of the error term in the probit model given the generator’s characteristics and its queue position. This is a reasonable assumption because both the PJM manual and interviews with industry experts indicate that priority for studies is based solely on queue position, and

¹⁵As discussed in Section 7.2.4, we estimate this probit model jointly with probit models for the cost arrival process and the decision to expedite a generator.

generators cannot do anything to expedite their studies. Neither does a transmission owner take into account the potential profit of a generator when conducting the studies. More complex studies may take longer, but we expect these effects to be well captured by controls for generator size, fuel type, previous cost estimate, and whether the project is sharing costs. A concern is that the presence of many nearby generators or nearby generators' withdrawals slow down studies, and we also estimate a specification that controls for the size, completion, and withdrawal of nearby generators in the queue.

We find a significant congestion externality for the third but not the second study. Table 3 reports estimates. The first column reports estimates from our baseline specification. Conditional on how long a generator has been waiting, we find that the queue position has a small effect on the arrival probability of the second study but a negative effect on the arrival probability of the third study. These estimates imply that, on average, a 10% increase in higher-queued generators reduces the probability of receiving the third study by 5%, and this effect is similar across generator sizes and fuel types (Appendix E.11).

We do not find that the size of the higher queued generators matters for the effect of queue position on study arrival. The second column of Table 3 shows that the number of large, higher-queued generators ($> 20\text{MW}$) has little additional effect conditional on the total number of higher-queued generators. The third column shows estimates from a specification that includes the entire queue size and as well as the size of the higher queued generators. This specification produces similar estimates for the effect of queue position on study arrival.

These findings are robust to including additional controls in the study arrival process. They are robust to controlling for the actions of nearby generators in the queue (Appendix Tables E.12, E.13 and E.9). They are also robust to including proxies for generator profit or construction costs unobservables in the arrival function. For a proxy for the unobservable affecting the revenue, we use the average locational marginal prices¹⁶ at the nearest bus to the generator. For proxies for costs, we use local solar ordinances and the distance to the nearest substation. We find their effects on study arrival to be small and statistically insignificant.

4.2 Geographic Cost Externality

Upgrades to the transmission infrastructure are often discrete. Thus, when a generator pays for an upgrade to the transmission network, a future generator connecting in the same lo-

¹⁶We use the quarterly average of hourly prices during peak hours (7am-11pm).

Table 3: New Study Arrival Probit Model: Queue Position Parameters

	(1) Baseline	(2) Congestion Effects of Higher-Queued Large Generators	(3) Additional Queue and Generator Characteristics
Queue Position			
ln (# Higher Queued Generators)	-0.10 (0.04)	-0.10 (0.04)	-0.10 (0.05)
ln (Total # Generators in the Queue)			-0.19 (0.09)
Generator <i>i</i> Waiting for Third Study ×			
ln (# Higher Queued Generators)	0.74 (0.15)	0.49 (0.43)	0.48 (0.24)
ln (# Higher Queued Generators) ²	-0.11 (0.02)	-0.11 (0.05)	-0.10 (0.02)
ln (# Higher Queued Generators > 20MW)		0.23 (0.40)	
ln (# Higher Queued Generators > 20MW) ²		0.02 (0.06)	
ln (Total # Generators in the Queue)			-0.10 (0.11)
ln (Higher Queued Generators Capacity MW)			0.19 (0.14)
Generator <i>i</i> Waiting for Third Study ×			
ln (# Higher Queued Generators) × Entry Year			
2013-2015	0.16 (0.02)	0.15 (0.02)	0.12 (0.03)
2016-2018	0.16 (0.02)	0.15 (0.02)	0.15 (0.03)
>2018	0.04 (0.03)	0.02 (0.03)	0.04 (0.04)

Parameter estimates related to the queue position for the new study arrival probit. # Higher Queued Generators is the number of generators that entered the queue in the same or an earlier entry cohort and are still in the queue for that quarter. SE in parentheses. Appendix Table E.12 presents estimates of the parameters for other covariates.

cation may benefit from the upgrade and pay a lower interconnection cost. To mitigate this externality, many grid operators share the costs of network upgrades across generators.¹⁷

We test for this externality in the data, focusing on those generators we expect to be most affected. PJM shares network upgrade costs across contemporaneous generators (typically, those within the same or adjacent cohorts) that trigger the same violation. We define “next” as the next generator that does not share costs with the completed generator. A grid operator we spoke with said any effects would be highly local, so we focus on generators connecting at the same substation and within ten kilometers of the costly interconnection.

We regress an indicator of whether a generator has a low interconnection cost estimate on whether the most recently completed interconnection at the same substation and within 10 km was costly. The first two columns of Table 4 show some evidence that a completed interconnection with a total cost over 1 million dollars increases the probability the next interconnection in that location has a low cost. Yet, the third and fourth columns show these effects are much smaller and not statistically significant once we control for whether the generator is an uprate, which is a request for a capacity expansion for an existing generator. We similarly

¹⁷In FERC Order 2023, the Commission states that “absent cost sharing provisions among clusters, interconnection customers may significantly benefit from earlier-in-time network upgrades but not share in the cost of those network upgrades in a manner that is roughly commensurate with benefits” (pg. 320) suggesting this externality is more relevant for systems without cost sharing (FERC, 2023).

Table 4: Effect of Prior Costly Interconnection on Probability of Low Interconnection Cost

Costly prior interconnection	0.080*	0.146**	0.015	0.095
	(0.048)	(0.065)	(0.048)	(0.062)
No prior interconnection	-0.038	0.044	-0.020	0.068
	(0.025)	(0.045)	(0.023)	(0.041)
Uprate			0.452***	0.429***
			(0.036)	(0.039)
Substation FE		X		X
N	1,597	1,597	1,597	1,597

Generators queuing from 2011-2020. SEs in parentheses; clustered by substation. Dep. var. is indicator for Study 2 cost estimate less than 0.01 m/MW (mean 0.31). Costly prior interconnection is an indicator for if the most recent prior completed interconnection at the same substation and within 10km of the focal generator had a total cost > 1 million dollars (mean 0.07). All specifications control for size (5 bins), fuel type, state, and FE for the year of queue entry and the year the study is issued. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

do not find statistically significant impacts for alternative definitions of the same location and thresholds for costly (Appendix Table E.5).

We also do not find that entry responds to costly, completed interconnections. We define a substation as a potential location for entry. For each substation-quarter, we regress an indicator for whether there is a new interconnection request on whether the prior interconnection is costly (>1 million dollars), controlling for PJM-wide grid investment, the voltage of the substation, local wholesale prices, and state-quarter-year fixed effects. In Table 5, we show that prior (costly) interconnections at same substation, within 10km, or within 50km have little effect on entry. The point estimates range from -0.1% to 0.6%, while the mean entry rate at a substation-month combination is 4.3%.¹⁸

4.3 Local Output Externality

Finally, a generator completing interconnection could reduce the incentive of other nearby generators to complete interconnection via the output market. We expect this effect to be well captured by the new generator's effect on local wholesale electricity prices.

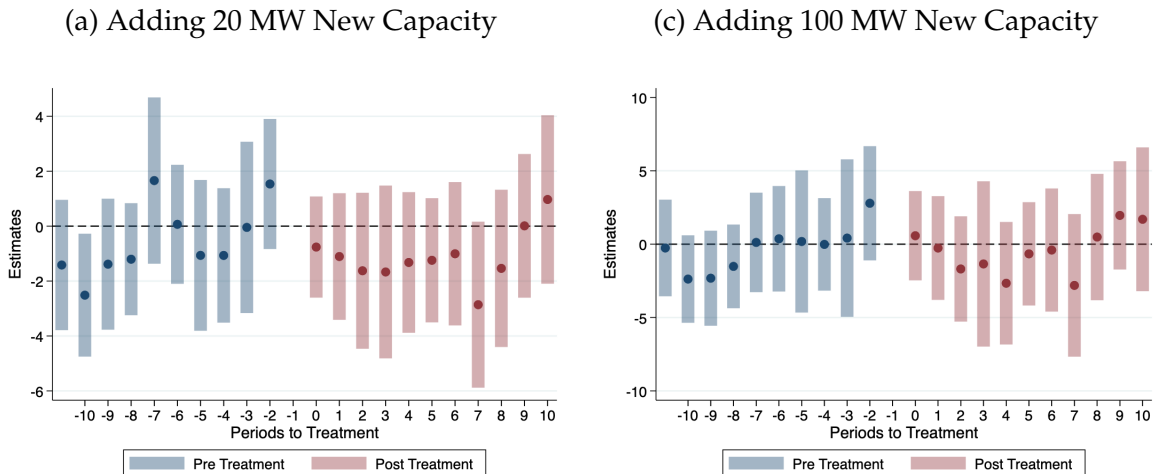
We next test if a new generator interconnecting reduces local wholesale prices. We first construct a monthly panel with an observation for each substation, which is a potential grid connection point. Our measure of monthly wholesale prices is the average locational marginal price at that substation. We use the event study Difference-in-Differences estimator from Callaway and Sant'Anna (2021) to estimate the effect of a new generator beginning operation on

¹⁸Appendix Table E.7 presents the summary statistics of the variables used in the regression.

these prices. The comparison group are substation-months without new generators beginning operation or with generators below a certain threshold in size beginning operation. The thresholds we use are 20 and 100 MW.

We find little effect of a new generator beginning operation on local prices. Figure 6 shows that we find a small decrease in price in the months after a generator begins operation. These effects are short-lived, lasting less than a year. A potential reason is that the interconnection process requires most new generators to upgrade the transmission infrastructure to the point that the new generator can deliver power to load in times of peak demand (PJM’s deliverability requirement). As the new power is sold PJM-wide, the local effect is small. We previously found there were no effects on entry (Table 5). Thus, the local effects of a completed interconnection on the expected profits of future generators are likely small.

Figure 6: Effects of Interconnections on Local Wholesale Prices



5 An Illustrative Model of the Interconnection Queue

Before introducing the full empirical model, we first illustrate the main idea in a T -period queuing model. There are N_1 generators entering in period 1 and N_2 in period 2. No generators enter in subsequent periods. For simplicity, we assume each generator needs only one study. A generator receives the study with some probability in each period. The probability decreases in the number of generators in the same or higher queue positions. Specifically, we use $N_{1,t}$ and $N_{2,t}$ to denote the numbers of generators that entered in periods 1 and 2 and are still in the queue at the beginning of period t . The study arrival probability is $p_{1,t}(N_{1,t}) = \Phi(-\ln N_{1,t})$ for a generator that entered in period 1, and $p_{2,t}(N_{1,t}, N_{2,t}) =$

$\Phi(-\ln(N_{1,t} + N_{2,t}))$ for those that entered in period 2. The timing is as follows:

1. At the beginning of each period, generators observe $(N_{1,t}, N_{2,t})$, form beliefs about the probability of receiving the study, and decide whether to leave the queue or continue to wait.
2. For those that choose to wait, a new study arrives according to $p_{1,t}(N_{1,t})$ and $p_{2,t}(N_{1,t}, N_{2,t})$.
3. Generators that receives the study decide whether to withdraw or pay the cost and complete the interconnection. Other generators continue to wait.
4. New generators enter the queue.

The queue ends at period T , when all generators leave the queue.

We first describe a generator's decision. We use $r_{1,t}$ to denote the period t belief about the study arrival probability of a generator that entered in period 1. A generator knows this belief for every t but is still uncertain about when its study will actually arrive. The value function of a generator that still waits is

$$V_{1,t} = E_{\zeta_{1,t}} \max \{ \zeta_{1,t}, r_{1,t} \Pi + (1 - r_{1,t}) V_{1,t+1} \}, \quad (1)$$

where $\zeta_{1,t}$ indicates the value of the outside option (withdrawal) and Π is the expected profit of receiving the study. The expectation is over the value of $\zeta_{1,t}$. We specify $\Pi = E_{c,\varepsilon} \max \{ \pi - c, \varepsilon \}$, where π is the present value of completing interconnection and building the generator, c is the interconnection cost, and ε is a shock that captures the value of withdrawal before the construction phase. At the terminal period T , $V_{1,T} = E \zeta_{1,T}$. The maximization problem implies the choice probabilities of whether to withdraw in any period t , $\Lambda_{1,t}$. We analogously define $r_{2,t}$ and $\Lambda_{2,t}$ for a generator that enters in period 2.

We consider a tractable queuing equilibrium. We assume that there is a continuum of heterogenous generators. Because each generator is non-atomistic, a generator's payoffs and beliefs depend only on the aggregate state of the queue, which is the number of generators waiting in this simple model. This large market assumption is similar to that in Buchholz (2022) and Liu, Wan and Yang (2024) and results in deterministic transitions for the aggregate state. Generators still face uncertainty about their own shocks. We define balance conditions where the number of generators continuously changes across periods; the number of generators next period is the number of generators in the current period times the probability

that they decide to wait but do not receive studies. This equilibrium is similar to the non-stationary oblivious equilibrium (NOE) in Weintraub et al. (2010). A key difference is that we use a finite horizon model. In the full model, we allow the queuing environment to vary over time, adding features such as increased entry into the queue.

The queuing equilibrium consists of the number of generators $\{N_{1,t}, N_{2,t}\}$, the choice probabilities $\{\Lambda_{1,t}, \Lambda_{2,t}\}$, and the beliefs $\{r_{1,t}, r_{2,t}\}$ for $t = 1, \dots, T$. The equilibrium requires the following restrictions:

1. **Optimality.** The choice probabilities are consistent with the Bellman equation (1) and its equivalent for generators that entered in period 2.
2. **Consistent beliefs.** We assume that

$$r_{1,t} = p_{1,t}(N_{1,t}), r_{2,t} = p_{2,t}(N_{1,t}, N_{2,t}).$$

3. **Balance conditions.**

$$N_{1,t+1} = N_{1,t} (1 - \Lambda_{1,t}) (1 - p_{1,t}(N_{2,t})),$$

$$N_{2,t+1} = N_{2,t} (1 - \Lambda_{2,t}) (1 - p_{2,t}(N_{1,t}, N_{2,t})).$$

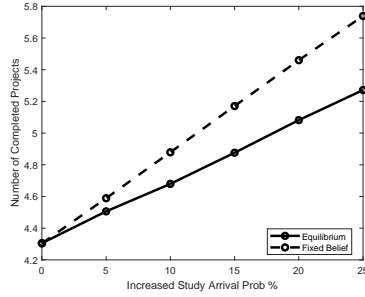
This tractable equilibrium concept still allows us to capture important equilibrium responses. As an example, we simulate how the equilibrium responds to faster study arrival. We first simulate the baseline equilibrium outcome and beliefs for $T = 30$. Then in Figure (7), we plot the number of completed generators when we hold the baseline equilibrium beliefs fixed and when we allow the equilibrium beliefs to adjust. We increase the study arrival probability by 5%, 10%, ..., 25%. The equilibrium effects mitigate the benefits of faster study arrival, because generators anticipate more generators will wait, slowing down the equilibrium study arrival. This mitigation effect is proportionally larger for generators that arrive later.

6 Empirical Model

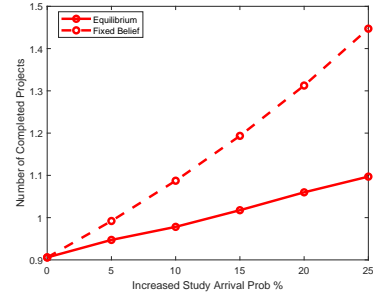
We now extend the illustrative model for our empirical context. We define a period to be a quarter. We assume that every generator enters the queue with a first study. The timing of the queue in each period is as follows:

Figure 7: Simulated Equilibrium: Illustrative Model

Generators that Entered in Period 1



Generators that Entered in Period 2



We set $N_1 = N_2 = 15$, $\pi = 3$, c is normal with a mean of 1 and standard deviation of 1, ζ and ε are i.i.d and standard normal, and $T = 30$.

1. At the beginning of a period t , the generator observes the cost estimate from the latest study and other time-varying information, such as the current calendar time, how many studies the generator has received, and whether certain engineering tests have been conducted.
2. The generator forms beliefs about whether the next study will arrive in the current period, the new cost estimate, and the other contents of the study. It decides whether to wait or withdraw.
3. For a generator that chooses to wait, a new study arrives with some probability. If the new study arrives,
 - (a) For a generator with two studies, the new study is the final study. The generator decides whether to complete the interconnection or withdraw.
 - (b) For a generator with one study,
 - i. With some probability the new study is the final study. The generator observes the final cost estimate and decides whether to complete the interconnection or withdraw;
 - ii. Otherwise, the generator observes the cost estimate and other contents of the study and decides whether to request the next study or withdraw.

If no new study is issued, the generator continues to the next period.

4. Potential generators decide whether to enter the queue.

6.1 Generator Decisions in the Queue

6.1.1 Notation

We focus on a particular generator’s decision and omit the generator subscript in our notation. A generator in calendar time period $t = 1, \dots, T$ is associated with time-invariant generator characteristics x , such as the size of the generator. While in the queue, the generator incurs a waiting cost of $o_t(\tau, \tilde{\tau}, x)$, where $\tau = 1, \dots, T_0$ is the number of periods a generator has been in the queue, and $\tilde{\tau}$ is the number of periods since receiving the previous study. Through its dependence on when the previous study was received, the waiting cost accounts for the study fee and deposit required by PJM to advance in the queue.¹⁹ We assume that each generator waits a maximum of eight years ($T_0 = 32$). The last quarter is $T = 85$, corresponding with an end year of 2028.

We use $k \in \{1, 2, 3\}$ to indicate which study the generator has received. We use c to denote the interconnection cost estimate from the latest study, and z to denote other information from previous studies.²⁰ In our analysis, we focus on two sets of contents in the study and specify $z = (z^{\text{test}}, z^{\text{cost-sharing}})$. The first component z^{test} is an indicator for whether PJM has conducted a set of engineering tests. These engineering tests quantify how much a new generator will overload the grid. The variable $z^{\text{cost-sharing}}$ is another indicator for whether PJM deems the generator part of a cost-sharing group collectively responsible for the same transmission upgrade.²¹

We use y_t to denote the equilibrium queue state that affects the cost and waiting time of a generator. The queue state has two main components that are both generator specific: (1) the generator’s queue position, which depends on the number, composition, and actions of other generators with earlier entry times, and (2) the number and sizes of other generators in the same region. Given the “first-come-first-served” rule, the queue position is the main factor determining the arrival time of a study. A generator’s outcome also depends on what other generators are present in the queue and geographically close. For example, PJM may jointly study generators that overload the same circuit breakers and ask them to share costs. We use a vector of variables in y_t to flexibly account for these effects. We discuss the detailed

¹⁹Deposits are paid in the first period after receiving the previous study.

²⁰The information may be cumulative. For example, each study contains results from different engineering tests, and the generator needs to aggregate these results to form beliefs about the final interconnection cost.

²¹Our estimates indicate that cost-sharing has, at most, a moderate effect on both the costs and study arrival. We therefore do not explicitly model the interactions between generators sharing costs. We also note that this is likely a PJM-specific feature. For example, the way costs are shared in another grid operator SPP can lead to a waiting game since costs often substantially decline when generators in the cost-sharing cluster withdraw (Charles et al. (2023)).

specification of y_t in Appendix 7.1.

We use $\pi_t(\tau, x)$ to denote the generator's expected discounted operating profit when it completes the interconnection process in period t after waiting for τ periods.²² We assume that the support of $(k, c, z, \tau, \tilde{\tau}, t, x)$ is discrete.

6.1.2 Belief Assumptions

We start with the belief of a generator that has received two studies and is waiting for the third and last study. Given the latest cost estimate c and study information z , we assume the belief about the arrival of the third study with a cost estimate c' in period t is

$$r_t(c'; c, z, \tau, \tilde{\tau}, x) \equiv H_3(c'; c, z, \tau, \tilde{\tau}, y_t, x), \quad (2)$$

where the function H_3 is the probability of PJM issuing the new study given the current status of the queue and the generator state. This function represents PJM's "production process" of studies. We assume this process is invariant to the actions of the generator up to the arguments of the H_3 function, which flexibly include the generator's queue position, whether the generator is a renewable generator, and a large set of other time-varying queue characteristics as well as time fixed effects. We make similar assumptions below about the other arrival probability functions, also denoted by H but distinguished by subscripts.

To simplify a generator's belief, we assume that the generator belief $r_t(\cdot)$ depends on the generator characteristics and the information contained in previous studies, varies over time, and is consistent with the equilibrium queue state y_t . The underlying assumption is that a generator reacts to the state of the queue aggregated in the function $H_3(\cdot)$, but not the actions of individual generators. This "large-market" assumption helps to reduce a generator's state space and has been used to analyze other settings with many strategic players (e.g. Agarwal et al. (2021); Chen and Xu (2023)).

Similarly, the belief about the arrival of a second study that is the final study with a new cost estimate c' is

$$p_t(c'; c, z, \tau, \tilde{\tau}, x) \equiv H_2(c'; c, z, \tau, \tilde{\tau}, y_t, x), \quad (3)$$

where H_2 is the probability that a second study arrives and PJM deems a third study to be

²²We can allow π to explicitly depend on the current and past queue states and account for how the equilibrium queue outcomes may affect the expected payoff. For example, existing entrants may decrease the expected profitability of the focal generator. In a robustness analysis, we estimate a profit function that depends on the completed generation capacity at the transmission owner territory level and find its effect to be negligible.

unnecessary.

Next, we assume that the belief about the arrival of a second study that is not the final study with a cost estimate c' and new information z' in the study is

$$q_t(c', z'; c, z, \tau, \tilde{\tau}, x) \equiv \tilde{H}_2(c', z'; c, z, \tau, \tilde{\tau}, y_t, x). \quad (4)$$

The function \tilde{H}_2 is the probability of the non-final second study arrival. In both $r_t(\cdot)$ and $p_t(\cdot)$, we assume that generators form beliefs about the costs which will directly enter the payoff function after receiving the final study. In $q_t(\cdot)$, the generator forms the beliefs about the cost c' and other contents z' of the next study. Both the current c and z affect the generator belief.

Finally, we assume that, when a generator enters the queue, the initial cost c and the study information z in the first study are assigned with probability $H_1(c, z; y_t, x)$. We assume the generator belief is consistent with this probability distribution:

$$v_t(c, z; x) = H_1(c, z; y_t, x). \quad (5)$$

6.1.3 Generator Decision

We start from the last period a generator can be in the queue, $\tau = T_0$. A generator that reaches this maximum waiting time receives the outside option and leaves the queue without completing interconnection. We assume the outside option (scrapping the project and relinquishing site control) is valued at $b_t(x) + \xi_t$ in period t , where $b_t(\cdot)$ varies over time and is a function of generator characteristics, and ξ_t is known to the generator but unobserved by the researcher.

For $\tau < T_0$, we first consider the case where the generator has received the final study cost estimate c in calendar time t . We assume the total cost to bring the generator online, including the costs of construction and equipment, is $g_t(x) + c + \varepsilon_t$, where $g_t(\cdot)$ represents how observed characteristics affect the cost, c is the interconnection cost from the final study, and ε_t is the generator-specific unobserved cost. Importantly, $g_t(\cdot)$ flexibly accounts for calendar time to capture exogenous trends such as the decrease in renewable installation costs and changes in subsidy policies. If the expected total profit exceeds the value of the outside option,

$$\pi_t(\tau, x) - g_t(x) - c - \varepsilon_t > b_t(x) + \xi_t,$$

the generator completes the interconnection. The expected value of reaching this stage is

$$\Pi_t(\tau, x, c) = E_{\varepsilon_t, \xi_t} \max \{ \pi_t(\tau, x) - g(t, x) - c - \varepsilon_t b_t(x) + \xi_t \}, \quad (6)$$

where we integrate over the random variables in the expectation sign's subscript.

We next consider the generator decision when it has two non-final studies. Suppose the generator's last study indicates a cost of c . The decision is whether to wait for the third study or withdraw. The option value of waiting depends on the probability $r_t(\cdot)$ of receiving a study next period, the waiting cost $o(\cdot)$, and the value of the outside option. The value of waiting is given by the following Bellman equation

$$W_t(c, z, \tau, \tilde{\tau}, x) = E_{\xi} \max \left\{ b_t(x) + \xi_t \sum_{c'} r_t(c'; c, z, \tau, \tilde{\tau}, x) \cdot \Pi_t(\tau, x, c') \right. \\ \left. + \left(1 - \sum_{c'} r_t(c'; c, z, \tau, \tilde{\tau}, x) \right) \cdot W_{t+1}(c, z, \tau + 1, \tilde{\tau} + 1, x) - o_t(\tau, \tilde{\tau}, x) \right\}. \quad (7)$$

where we take expectations over values of the outside options and the final study cost. We do not separately include a discount factor in addition to the waiting cost. The probability of staying in the queue is the probability that the first term in the maximand is lower than the second term.

Now we consider the decision when the generator decides whether to wait for the second study after entry. The generator may receive a second study that is the final study, a second study that is not the final study, or withdraw. The value of waiting takes into account the respective payoffs, the arrival probability $p_t(\cdot)$ of a final second study, and the arrival probability $q_t(\cdot)$ of a non-final second study:

$$V_t(c, z, \tau, \tilde{\tau}, x) = E_{\xi} \max \left\{ b_t(x) + \xi_t \sum_{c'} p_t(c'; c, z, \tau, \tilde{\tau}, x) \cdot \Pi_t(\tau, x, c') \right. \\ \left. + \sum_{c', z'} q_t(c', z'; c, z, \tau, \tilde{\tau}, x) \cdot W_{t+1}(c', z', \tau + 1, 1, x) \right. \\ \left. + \left(1 - \sum_{c'} p_t(c'; c, z, \tau, \tilde{\tau}, x) - \sum_{c', z'} q_t(c', z'; c, z, \tau, \tilde{\tau}, x) \right) \right. \\ \left. \cdot V_{t+1}(c, z, \tau + 1, \tilde{\tau} + 1, x) - o_t(\tau, \tilde{\tau}, x) \right\} \quad (8)$$

In the above, we can normalize the net mean profit π to be $\pi - g - b$. This normalization does not affect the choice probabilities of waiting or completion but simplifies the Bellman

equations. With a slight abuse of notation, we still use π to denote the normalized mean profit and write our Bellman equations as

$$\Pi_t(\tau, x, c) = E_{\xi_t, \varepsilon} \max \{ \pi_t(\tau, x) - c - \varepsilon_t, \xi_t \}, \quad (9)$$

$$W_t(c, z, \tau, \tilde{\tau}, x) = E_{\xi} \max \left\{ \xi_t, \sum_{c'} r_t(c'; c, z, \tau, \tilde{\tau}, x) \cdot \Pi_t(\tau, x, c') \right. \\ \left. + \left(1 - \sum_{c'} r_t(c'; c, z, \tau, \tilde{\tau}, x) \right) \cdot W_{t+1}(c, z, \tau + 1, \tilde{\tau} + 1, x) - o_t(\tau, \tilde{\tau}, x) \right\}. \quad (10)$$

$$V_t(c, z, \tau, \tilde{\tau}, x) = E_{\xi} \max \left\{ \xi_t, \sum_{c'} p_t(c'; c, z, \tau, \tilde{\tau}, x) \cdot \Pi_t(\tau, x, c') + \sum_{c', z'} q_t(c', z'; c, z, \tau, \tilde{\tau}, x) \right. \\ \cdot W_{t+1}(c', z', \tau + 1, 1, x) + \left(1 - \sum_{c'} p_t(c'; c, z, \tau, \tilde{\tau}, x) \right. \\ \left. - \sum_{c', z'} q_t(c', z'; c, z, \tau, \tilde{\tau}, x) \right) \cdot V_{t+1}(c, z, \tau + 1, \tilde{\tau} + 1, x) - o_t(\tau, \tilde{\tau}, x) \left. \right\} \quad (11)$$

At the terminal period $\tau = T_0$ for each generator without its final study, the normalization implies that $W_t(c, z, \tau = T_0, \tilde{\tau}, x) = V_t(c, z, \tau = T_0, \tilde{\tau}, x) = 0$.

Finally, we model the entry decision as

$$E_{c, z} (V_t(c, z, \tau = 1, \tilde{\tau} = 1, x) | t, x) > \underline{c}_t(x), \quad (12)$$

where the left-hand side is the expected surplus from entering the queue, and $\underline{c}_t(x)$ is the entry cost. The expectation is taken over the belief of the first study cost c and information z conditional on the entry time t and x . The set of N potential entrants is denoted as $\mathcal{X} = \left\{ (i, t_i, x_i)_{i=1}^N \right\}$, where t_i and x_i are the entry time and characteristics of generator i . A potential entrant i leaves after period t_i if it decides not to enter the queue.

To compute the value of entry, a potential generator may use information from past or current interconnection requests. To partially account for this information, we calculate the number of other generators that have withdrawn from the queue in the past two quarters within a 100km radius and the same transmission owner territory, and include it in the first study cost function. Our entry model does not directly account for the interconnection costs in recent studies of nearby generators. In Appendix B, we find these costs have at most a

moderate effect on subsequent entry at the same point of interconnection, especially compared with other factors outside the queue, such as baseline transmission investment by the grid operator.

6.1.4 Queuing Equilibrium

We consider a finite-horizon queuing equilibrium, where the beliefs of the generators are consistent with the state of the queue in calendar time t . The finite horizon assumption allows us to capture the non-stationarity in the cost of wind turbines and solar panels and the increase in the number of entrants.

We use $\Psi_t(c, \tau, x)$ to represent the withdrawal probability of a generator after receiving the final study with a cost estimate c , $\Lambda_t(c, z, \tau, \tilde{\tau}, x)$ the withdrawal probability when it waits for the third study, $Y_t(c, z, \tau, \tilde{\tau}, x)$ the withdrawal probability when it waits for the second study, and $\Xi_t(x)$ the withdrawal probability of potential entrants. We use $m_t(c, z, \tau, \tilde{\tau}, k, x)$ to denote the fraction of generators waiting in period t with a cost estimate c , time-varying characteristics $\{z, \tau, \tilde{\tau}, k\}$, and time-invariant characteristics x . The equilibrium consists of (1) optimal withdrawal probabilities $\{\Psi_t, \Lambda_t, Y_t, \Xi_t\}_{t=1}^T$, (2) the beliefs about new studies $\{r_t, p_t, q_t, v_t\}_{t=1}^T$, (3) the composition of the queue in every period $\{m_t\}_{t=1}^T$, and (4) the number of waiting generators N_t in every period $\{N_t\}_{t=1}^T$. The equilibrium queue status that affects study arrival and costs is aggregated from the queue composition and queue size via a function S ,

$$y_t = S \left(x, \{m_{t'}, N_{t'}, \Psi_{t'}, \Lambda_{t'}, Y_{t'}, \Xi_{t'}, r_{t'}, p_{t'}, q_{t'}, v_{t'}\}_{t'=1}^t \right).$$

A queuing equilibrium satisfies the following conditions:

1. **Optimality conditions.** The withdrawal probabilities $\{\Psi_t, \Lambda_t, Y_t, \Xi_t\}_{t=1}^T$ are consistent with the Bellman equations in (9), (10), (11) and (12).
2. **Consistent beliefs.** The generator beliefs $\{r_t, p_t, q_t, v_t\}_{t=1}^T$ about the arrival probabilities of new studies and their contents are consistent with (2), (3), (4) and (5).
3. **Balance conditions.** For every $t = 1, \dots, T$,
 - (a) The transition of the queue ($\tau > 1$).

i. For generators with two studies and waiting for the third study,

$$\begin{aligned}
& N_{t+1}m_{t+1}(c, z, \tau + 1, \tilde{\tau} + 1, k = 2, x) \\
& = N_t m_t(c, z, \tau, \tilde{\tau}, k = 2, x) \cdot (1 - \Lambda_t(c, z, \tau, \tilde{\tau}, x)) \\
& \cdot \left(1 - \sum_{c'} r_t(c'; c, z, \tau, \tilde{\tau}, x) \right). \tag{13}
\end{aligned}$$

ii. For generators just receiving the second study,

$$\begin{aligned}
& N_{t+1}m_{t+1}(c, z, \tau + 1, \tilde{\tau} = 1, k = 2, x) \\
& = N_t \sum_{c', z', \tilde{\tau}'} m_t(c', z', \tau, \tilde{\tau}', k = 1, x) \\
& \cdot (1 - Y_t(c', z', \tau, \tilde{\tau}', x)) \cdot q_t(c, z; c', z', \tau, \tilde{\tau}', x). \tag{14}
\end{aligned}$$

iii. For generators with one study and waiting for the second study,

$$\begin{aligned}
& N_{t+1}m_{t+1}(c, z, \tau + 1, \tilde{\tau} + 1, k = 1, x) \\
& = N_t m_t(c, z, \tau, \tilde{\tau}, k = 1, x) \cdot (1 - Y_t(c, z, \tau, \tilde{\tau}, x)) \\
& \cdot \left(1 - \sum_{c', z'} q_t(c', z'; c, z, \tau, \tilde{\tau}, x) - \sum_{c'} p_t(c'; c, z, \tau, \tilde{\tau}, x) \right). \tag{15}
\end{aligned}$$

(b) The boundary condition (entry):

$$N_t m_t(c, z, \tau = 1, \tilde{\tau} = 1, k = 1, x) = v_t(c, z; x) n_t(x) (1 - \Xi_t(x)), \tag{16}$$

where $n_t(x)$ is the number of new generators with characteristics x and entry time t in the set of potential entrants \mathcal{X} .

In equilibrium, a generator has perfect foresight over the evolution of the queue but faces uncertainty over its own studies.

7 Identification and Estimation

There are two key sets of parameters in our model. First, we flexibly specify the components of queue state y_t (the S function) and directly estimate the functions that govern how PJM issues studies (H_1, H_2, \tilde{H}_2 and H_3) from data. These parameters govern the exogenous

transition dynamics of the model between quarters.

Second, we use the estimated functions to construct beliefs and use the withdrawal and completion decisions to recover preferences, which are the parameters of the profit function $\pi_t(\tau, x)$, the waiting cost $o(\tau, \tilde{\tau}, t, x)$, and the distribution of ζ_t and ε_t . Importantly, we assume that the set of potential entrants \mathcal{X} is the set of observed actual entrants. There are two main reasons for this assumption. First, as discussed in Section 2, developers face long waiting times and great cost uncertainty in the queue as well as an extremely low entry cost relative to the generator’s installation cost. In response, developers enter a large number of generators into the queue even though many generators have a low probability of completion. Given this unique institutional fact, we think it is reasonable to assume that developers have exhausted all entry opportunities. Second, the utility-scale solar industry, which constitutes the majority of requests, significantly expanded during the latter half of our sample, but the expansion was due to a large decrease in the cost of solar panels that was unrelated to the queuing process. Given these considerations, we fix the entry probability to be 1 in estimation. In Section 7.4, we discuss the assumptions for estimating the entry costs.

7.1 Queue State y_t

For the S function that aggregates the current and past evolution of the queue to the queue state y_t , we include two sets of vectors. The first set describes the queue position. In period t , we compute each generator’s queue position as the number of generators that entered the queue in the same or an earlier entry cohort and are still in the queue. We include the queue position and its interaction with whether generator i is waiting for the third study. We also allow for nonlinear and time-varying effects of the queue position by including its higher order terms and interactions with time fixed effects.

The second set of variables accounts for the effects of other local generators in the queue. As discussed in Section 2, the local transmission owner usually conducts the tests and issues the studies on behalf of PJM. A large local backlog may also affect the the local transmission owner’s ability to conduct studies. Furthermore, multiple generators in the same location may share the costs of transmission upgrades. We therefore also include the number and the total capacity of local generators. We consider two definitions of being local to a generator. One is to be in the same transmission owner service territory, and the other is to be within a 100km radius of the generator.²³ For similar reasons, withdrawals of local generators may

²³In engineering models, PJM measures distances in “electric distances” based on impedance, which requires

lead to re-study, which changes costs and delays the studies for remaining generators. We therefore also include the local (as defined above) withdrawals in the past two quarters. Thus, the queue status y_t is specific to a generator's location and entry time.

7.2 Transition Dynamics

The functions H_1 , H_2 , \tilde{H}_2 and H_3 describe the timing and information of a new study. These functions are directly identified and estimable from data (e.g., Aguirregabiria and Mira (2007); Bajari, Benkard and Levin (2007)). We focus on the specification of these functions in this section. The input of the functions includes the cost assessment c from the most recent study, the study information z from previous studies, the time since the generator entered the queue τ , the time since the most recent study was issued $\tilde{\tau}$, the current calendar time t , generator-specific characteristics x , and the current queue state y_t .

The outputs of the H functions differ. The functions H_2 and H_3 generate the probability that a new study that is the final study (whether it is the second or third study) will be issued in the current period, and that the new cost is c . The function \tilde{H}_2 generates the probability that a new study that is not the final study will be issued and that the updated cost and information are c and z . The function H_1 generates the cost and information for the first study.

Given the complex set of decisions in the queuing process, we simplify our model by considering two processes: (1) the arrival of a new study and the cost distribution, and (2) conditional on receiving the second study, PJM's decision to expedite the interconnection requests, i.e., require only two studies, and to update the information z . We then combine these processes to produce the H functions.

7.2.1 New Study Arrival and Cost

We start by specifying a flexible probability function for receiving a new study with a cost c . We discretize the cost and consider a joint probit (for study arrival) and ordered probit (for the cost level) model. We divide the interconnection costs (in million \$/MW) into $L = 4$ bins, with bin $\ell \in C_\ell = \{[0, 0.01], (0.01, 0.05], (0.05, 0.20], (0.20, \infty]\}$. We specify the latent

detailed knowledge about the physical distance and capability of the connecting transmission lines. We find that a physical distance of 100km is a reasonable cutoff to account for the effect of nearby generators. We randomly sampled 100 generators that PJM identifies as contributing to the same violation with at least one other generator. Then, for each of 100 sampled generators, we compute the average distance to the corresponding cost-sharing generators. We find that 86% of the average distances are within 100km.

variables governing study arrivals and costs as

$$\begin{aligned} u^{\text{arrive}} &= \beta^{\text{arrive}} \cdot d_1(\ell, z, k, x, y_t), \\ u^{\text{cost}} &= \beta^{\text{cost}} \cdot d_2(\ell, z, k, x, y_t), \end{aligned}$$

where the $d_{(\cdot)}(\cdot)$ functions are vectors of flexible polynomials of the characteristics, and the $\beta^{(\cdot)}$ s are vectors of parameters. We use cost bin ℓ in place of c (from the most recent study) to make it clear that we model the cost as a discrete variable. The probability that the new study arrives and the new cost estimate is in bin ℓ' is defined as

$$h_t(\ell'; \ell, z, \tau, \tilde{\tau}, k, x, y_t(x)) = \Pr\left(0 < u^{\text{arrive}} + \epsilon_t^{\text{arrive}}, \mu_{\ell'} \leq u^{\text{cost}} + \epsilon_t^{\text{cost}} \leq \mu_{\ell'+1}\right), \quad (17)$$

where $\mu_1 = -\infty, \mu_2 = 0$, and $\mu_2 \leq \dots \leq \mu_L < \mu_{L+1} = \infty$ are a series of parameters. We allow the normally distributed errors $\epsilon_t^{\text{arrive}}$ and ϵ_t^{cost} to be correlated.

7.2.2 PJM Decision to Expedite Interconnection Requests and Update Information z

PJM determines whether to expedite a generator based on the size and generation type and whether certain types of violations are identified in the first study (PJM (2010)). Instead of fully modeling PJM's rules and engineering simulations for these decisions, we simplify the analysis by using a flexible probit model based on generator characteristics. We use $p_t^{\text{final}}(\ell, z, x, y_t)$ to denote the predicted probability the second study is the final study.

We apply the same approach to the other two PJM decisions, which we track as the cumulative information $z = (z^{\text{test}}, z^{\text{cost-sharing}})$. For $z^{\text{test}} \in \{0, 1\}$, we focus on a set of three tests: generator deliverability, multiple facility contingency, and short circuit analysis. These tests are jointly conducted to determine how much the generator will overload the grid. PJM may choose to conduct these tests in the first or the second study depending on the generator's characteristics and the current local transmission network conditions. We also consider whether the generator shares costs with other generators, $z^{\text{cost-sharing}} \in \{0, 1\}$. To determine this variable, PJM conducts additional tests (short circuit dynamic analysis and system protection analysis) to identify generators responsible for the same upgrade. Both variables can inform the arrival time of the next study and the cost. We denote the corresponding predicted probabilities as $p_t^{\text{test}}(\ell, z, x, y_t)$ and $p_t^{\text{cost-sharing}}(\ell, z, x, y_t)$.

7.2.3 The H Functions

We combine these processes to yield the following transition functions. We set

$$H_3 = h_t(\ell'; \ell, z, \tau, \tilde{\tau}, k = 2, x, y_t)$$

and

$$H_2 = h_t(\ell'; \ell, z, \tau, \tilde{\tau}, k = 1, x, y_t) \cdot p_t^{\text{final}}(\ell, z, x, y_t).$$

For the probability of receiving a non-final second study, we assume (omitting arguments of the p_t^{final} , p_t^{cluster} and p_t^{test} functions) that:

$$\begin{aligned} \tilde{H}_2(\ell', z^{\text{test}'}, z^{\text{cluster}'}; \ell, z, \tau, \tilde{\tau}, y_t, x) &= \left(z^{\text{cluster}'} p_t^{\text{cluster}'} + (1 - z^{\text{cluster}'}) (1 - p_t^{\text{cluster}'}) \right) \\ &\cdot \left(z^{\text{test}'} p_t^{\text{test}'} + (1 - z^{\text{test}'}) (1 - p_t^{\text{test}'}) \right) \cdot (1 - p_t^{\text{final}}) \\ &\cdot h_t(\ell'; \ell, z, \tau, \tilde{\tau}, k = 1, x, y_t). \end{aligned}$$

For H_1 , we assume that the cost in the first study is determined by a flexible ordered probit function of x and y_t . We set z to be what we observe in the first studies in the data.²⁴ Although our specification restricts the unobservables to be independent, we do allow PJM decisions on issuing studies, costs, expediting generators, and conducting tests to be correlated through a large set of flexibility specified observables.

7.2.4 Identification and Estimation

We use maximum likelihood to estimate these transitions. In Section 4.1, we discussed identification of the study arrival function if we were to estimate it separately. In practice, we allow the normal unobservable $\epsilon_t^{\text{arrival}}$ in the probit function for study arrival and the unobservable ϵ_t^{cost} in the ordered probit function for interconnection costs to be correlated. The key identification assumption is that $(\epsilon_t^{\text{arrival}}, \epsilon_t^{\text{cost}})$ is independent of the observables and conditionally independent of the generator decisions to withdraw from the queue given the observables. The observables include the generator location, fuel type, size, study outcomes and queue status. The conditional independence is a reasonable assumption for study arrival and the cost transition, because study priority depends entirely on the queue position, and transmission owners calculate the costs for upgrades based on a set of engineering studies and without

²⁴If either z is 1, then the indicator will continue to be 1 in subsequent studies. Our results are robust to setting $z = (0, 0)$ and assuming only study 2 updates this information.

any negotiation with project developers. Based on interviews with project developers, a main source of cost uncertainty is what equipment the transmission owner would require for the upgrade and its cost. Section 4.1 reported select estimates of the study arrival process, and estimates for all transition function parameters appear in Tables E.12, E.12, and E.13.

7.3 Generator Preferences

7.3.1 Identification

We start with the identification of the payoff function. We take the functions H_1 , H_2 , \tilde{H}_2 and H_3 as given. In standard optimal stopping problems, it is often not possible to separately identify the waiting cost o and the payoff function π because a stopping decision (withdrawal) may be explained by a low payoff or a high waiting cost. Our case is different. We observe two types of decisions: the decision to wait while the generator is in the queue, and the decision to complete the interconnection when the final study is issued. The variation of the generator characteristics and final-study interconnection cost c identify the payoff function following the standard identification argument of binary choice problems (Manski (1988)).

Specifically, we specify the profit and waiting cost functions as

$$\pi_t(\tau, x) = \beta_\pi \cdot d_\pi(\tau, t, x), o_t(\tau, \tilde{\tau}, x) = \beta_o \cdot d_o(\tau, \tilde{\tau}, t, x),$$

where (β^π, β^o) are vectors of parameters, $(d_\pi(\cdot), d_o(\cdot))$ are vectors of covariates based on current calendar time, waiting time and generator characteristics (size, fuel type, location, and entry time). Intuitively, to identify the effect of an indicator variable on profits, we exploit the variation of the withdrawal probability Ψ implied by the maximization problem in equation (9) across generators conditional on this variable being 0 vs 1, holding other variables fixed. For a continuous variable, we exploit the variation in Ψ across generators with different values of this variable. To see how the distribution of the unobservable is identified, consider, for example, a distribution of ζ_t known up to its variance. If the variance is large, the withdrawal probability will not significantly change with the interconnection cost. In the special case that ζ_t is mean zero and symmetric, the withdrawal probability will be close to 0.5 at a high variance. On the other hand, a small variance implies that withdrawal probabilities would be dramatically different for generators with small differences in interconnection costs. In our sample of generators that completed the interconnection or withdrew after receiving the last study, the median interconnection cost is \$9,100/MW. The completion rate is 49.4%

for generators below the median, and 28.8% for those above it.

The argument for identifying the waiting cost is constructive. Given the identified profit function π_t , we can use backward induction to construct the value function for any generator in its last period $\tau = T_0$. Then the only unknown parameter in the withdrawal probability at $\tau = T_0 - 1$ is the waiting cost. The withdrawal probability is identified from data, and inverting this probability identifies the waiting cost. We can apply the argument to $\tau, \tilde{\tau} = T_0 - 2, T_0 - 3, \dots$ and any t . This identification argument relies on the normalization that the mean value of the outside option is 0, which means that we interpret the waiting costs as the difference between the actual waiting costs and the (potentially time-varying) value of the outside option. In the empirical analysis, we adopt a more parsimonious specification for the waiting cost to limit the number of parameters.

One may be concerned about unobserved heterogeneity across generators. In particular, generators at locations that have higher demand may be more likely to stay, and those at locations with higher unobserved costs of building infrastructure may be more likely to exit. To address this concern, we consider the following extension in a robustness analysis, where the profit function is

$$\pi_t(\tau, x) = \beta_\pi \cdot d_\pi(\tau, t, x) + \zeta_{\text{sub}}. \quad (18)$$

The unobservable ζ_{sub} is a substation-level random effect for the nearest substation with a normal distribution and unknown variance σ_{sub} . We use the panel structure of the data, where multiple generators enter near the same substation, to identify σ_{sub} . The intuition is that a larger variance implies stronger within substation correlations in the withdrawal decisions.

7.3.2 Estimation

We use maximum likelihood to recover generator preference parameters in the baseline model based on the 2011 to 2020 sample.²⁵ We use the estimated transition functions in Section 7.2 as generators' beliefs in the dynamic programming problem. To estimate the extension with the random substation effects in (18), we use a simulated maximum likelihood approach.

Table 6 presents the estimates of the profit function, β^π . Column (1) is our baseline estimate. Column (2) includes substation-level unobserved heterogeneity. We also include state, entry year, and year fixed effects to account for policy and technology heterogeneity across space and time. The estimates of covariate parameters are largely similar across the two spec-

²⁵We use the pre-2011 sample to compute the queue status (such as the number of higher-queued generators) and hold them fixed.

ifications. We find that generators with capacity between 20 and 100 MW have a higher net profit on a per megawatt basis than those below 10 MW, and the profit of larger generators is not necessarily higher. Renewable generators have a lower net profit per megawatt of capacity, consistent with their higher withdrawal rates and lower capacity factors.

Appendix Table E.10 presents the estimates for the waiting costs. We find that waiting costs are high in periods immediately after receiving the studies, and the additional cost of waiting for the third study is \$3,500 per MW per quarter (e.g., \$71,000 per quarter for a 20 MW generator). These costs account for both the administrative costs of maintaining the queue position as well as economic costs such as extending site control. The estimates rationalize the data pattern that a high proportion of withdrawals occurred after the studies are issued (Appendix Figure E.2).

Appendix Table E.14 presents estimates for the standard deviation parameters for the unobservables. The estimated standard deviations of ζ_t , which reflect the unobserved profit and cost shocks after the generator learns the final study cost estimate, are large (greater than \$100,000 MW in most years), but have decreased since 2012. Renewables face considerably greater uncertainty than other generators. Unlike other generators, renewables that have been in the queue for more than two years face a higher standard deviation of ζ_t , which is consistent with our interviews that these generators often face additional uncertainties about securing a long term contract and sourcing the panels or turbines at the stage of completing the interconnection. These uncertainties are often much greater than ε_t , which is the quarter-to-quarter unobserved outside option as the generator continues to wait. The estimated standard deviation of ε_t is about \$78,770 per MW in the baseline estimates, comparable to that of the random effect in specification (2).

7.4 Entry Costs

To estimate the entry cost, we rely on a free-entry assumption:

Assumption. *The lowest expected profit from entering the queue in each year is 0.*

In effect, we assume that the marginal interconnection request just breaks even, which is reasonable given the large number of entrants. We define the expected profit as the expected surplus of entering the queue minus the entry cost in (12):

$$E_{c,z} (V_t(c, z, \tau = 1, \tilde{\tau} = 1, x) | t, x) - \underline{c}_t(x).$$

For simplicity, we assume that the entry cost (on a per megawatt basis) is the same across potential generators in a given year, but this assumption can be relaxed to allow the cost to vary based on observable characteristics, such as location and fuel type. For the entry cost in year j , we compute the lowest expected surplus from entering the queue in year j , defined as

$$\underline{c}_{j(t)} = \min_{x \in \mathcal{X}_j} E_{c,z} (V_t(c, z, \tau = 1, \tilde{\tau} = 1, x) | t, x),$$

where \mathcal{X}_j is the set of potential entrants in year j , $j(t)$ denotes the year of the period t , and the value function is given by the Bellman equations (9) through (12).

This procedure gives us reasonable estimates for the entry costs. In Appendix Figure E.3, we present the distribution of the expected surplus by year. We estimate the entry costs are from \$48,200 to \$81,100 per megawatt. For perspective, annual lease payments for solar range from about \$2,000 to \$20,000 per megawatt (Parker et al., 2023), though an exclusive option to lease is cheaper. Our estimates of the economic costs of entry also account for other factors, such as deposits to enter the queue, negotiating leases with landowners, building community support, and starting the permitting process.

8 Equilibrium Simulation and Model Fit

We use the estimated model to simulate the queuing equilibrium defined in Section 6.1.4. The details of the simulation procedure are given in Appendix C. We provide a high level summary here.

The procedure embeds three assumptions. First, by explicitly starting the iteration with the observed outcomes, we select a particular equilibrium that is naturally motivated by data. Second, we assume perfect foresight for the evolution of the queue status. This is not an overly restrictive assumption, as in our context, the long term increase in queue size is not surprising given the rapid decrease in the cost of renewable generators. At the same time, generators do not have perfect foresight over short term events such as the study arrival or future values of unobserved shocks. Third, we take the arrival time of potential entrants and their characteristics x as given.

To validate our model, we first compare the time series of aggregate investment it predicts to the data. Figure 8 shows the cumulative capacity that was completed, by queue year, for generators in our sample (queued between 2011 and 2020). The left panel shows the cumulative capacity for all generators, and the right panel shows the cumulative capacity for

Algorithm 1 Summary of Equilibrium Simulation

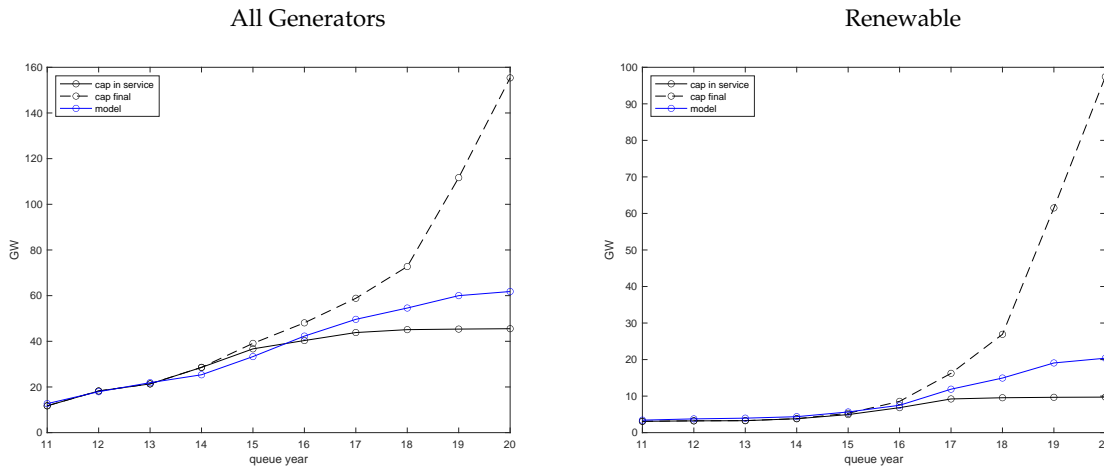
- Initialization
 - Use the observed outcomes in the data to compute the queue status y_t for period $t = 1, \dots, T$.
 - Compute the distribution of study arrival, cost bins and information z using $H_1, H_2, \tilde{H}_2, H_3$ for each potential entrant i in \mathcal{X} for each $\tau, \tilde{\tau}_i$ after the entry date t_i .
 - Solve the equations (9), (10), (11) and (12), and the associated withdrawal probabilities.
- Iteration
 1. Given the current study transition and withdrawal probabilities, compute the fractions of a generator i that withdraws, waits, and, if the final study arrives, completes the interconnection.
 2. Update the queue status y_t .
 3. Update the study transition and withdrawal probabilities.
 4. Iterate until convergence.

renewables. The solid black lines plot the total capacity of generators in the data that are completed, i.e., they have completed construction and started operation. For example, the solid black line in 2018 represents the total completed capacity, as of 2022, of generators that entered the queue by 2018. As we near the end of our sample, there are many generators that are waiting for their next studies or have received their final interconnection study but have not been completed or withdrawn from the queue. The dotted black lines represent the capacity of these generators (which include generators still under construction) plus the capacity of generators that are completed from data.

Our model is able to match these time series. The solid blue line plots the model's prediction for the total capacity *ever* completed, by queue year. For the early years, this should match the capacity actually completed as of 2022 (the solid black line); all generators queued in these early years have had time to finish construction and begin operation. The completed capacity for generators entering the queue in 2014 and 2018 is slightly under-predicted by the point estimates of the model but covered within the reasonably narrow confidence intervals. For later years, the blue line lies between the solid and dotted black lines as expected.²⁶

²⁶In Appendix Figure E.4, we show the model fit for the growing queue sizes.

Figure 8: Cumulative Completed Capacity as of 2022, Model and Data



The solid black lines (cap completed) represent the total cumulative capacity of generators in our sample that have started operation by 2022. For example, the capacity in 2018 represents the total completed capacity of generators that entered the queue in 2018 or earlier. The dotted black lines (cap in queue) represent this capacity plus the capacity of generators that have not withdrawn as of 2022. The blue line is the simulated cumulative capacity that will ever be begin operation, by queue year. The red line represents the confidence intervals for the model prediction.

9 Counterfactual Simulations

We use our estimated model to conduct three sets of counterfactual simulations. The first two sets focus on quantifying the congestion externality. In the first, we simulate the added capacity if the necessary studies are delivered faster, holding entry fixed. This exercise can be seen as quantifying the returns to increasing PJM’s processing capacity.

In the second, we hold PJM’s processing capacity fixed and ask whether we can increase the added capacity by removing select generators. Removing generators expedites the studies for the remaining generators, reducing their chance of withdrawal and potentially increasing total completed capacity.

We next consider policy reforms that address the congestion externality. We simulate the effects of increasing the the cost of entering or staying in the queue, and we compare flat per generator fees to fees to fees that increase linearly with project size.

9.1 Reducing Study Delays

As discussed in Section 2.2, reducing study delays may have a first-order impact on increasing completed capacity. A structural reason for the long waiting time is grid operators’ limited capacity to process generator requests. Grid operators told us they are limited by engineering

staff capacity and that they had difficulty hiring electrical engineers, whose supply is inelastic in the short run due to the training involved. In principle, grid operators could offer higher wages, hire more engineers, and speed up the process. We simulate five scenarios in which the study arrival probabilities of the second and third studies are increased by 5% to 25%.

We find large increases in completed capacity from reducing waiting times. Figure 9 reports the simulation results. The x -axis shows the average waiting time from the first to the last study conditional on not withdrawing from the queue before the last study, and the y -axis is the added capacity. A 10% increase in the study arrival probabilities reduces waiting time by about 2%,²⁷ and adds 4.0 GW of total capacity, of which 1.6 GW is renewable.²⁸ These additions correspond to increases of 5.6% and 4.6%, respectively. The added capacity increases quickly in the study arrival probability for all generators; for example, a 25% increase adds nearly 9 GW of new capacity.

We interpret these large gains as being due to reductions in both the cost and uncertainty from waiting in the queue. Generators incur costs like maintaining the option on the land, but also face many risks, such as the expiration of signed purchase agreements (Penrod, 2022). Our model captures the first with the waiting costs and the second with the idiosyncratic unobservable ε_t . We estimate the standard deviation of ε_t to be larger than the difference in waiting costs due to generator size, fuel type, or time.

9.2 Alternative Queuing Mechanisms

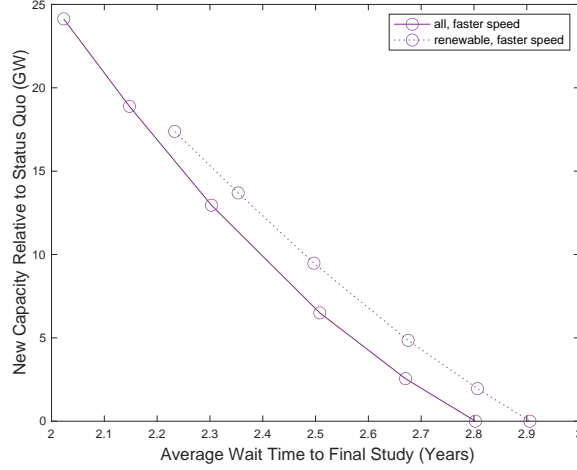
We next take the processing ability of PJM as given and consider alternative queuing mechanisms. We search for, for each potential entrant, a weight between 0 and 1 to maximize the total completed capacity. We treat each generator as a continuous mass, and the weight represents the share that the grid operator includes in the queue.²⁹ These weights modify the queue status. For example, the queue position of a generator is given by the sum of the weights of

²⁷A 10% increase in the study arrival does not result in a 10% decrease in the waiting time for two reasons: (1) we plot the conditional average waiting time given that the generators do not withdraw, and generators that reach their last studies receive studies faster, which limits the scope for faster study delivery to reduce their waiting time, and (2) faster study delivery increases the value of waiting, so more generators wait in equilibrium, increasing congestion.

²⁸A developer could save the time of going through the queue again by entering at the same location with multiple identical requests across time. If a prior generator fails to complete the interconnection even when the interconnection cost is low, the generator can immediately use the queue position of a subsequent generator at the same location and expect similar interconnection study results. We could over-predict the completed capacity if this practice is widespread. We do not find this practice to be of first-order importance: locations that saw consecutive entry of generators that have the same fuel sources and similar capacities contribute to 0.12 GW of added total capacity and 0.07 GW of added renewable capacity.

²⁹An alternative is to solve the integer programming problem of which generators to keep in the queue, but this optimization problem would be much harder.

Figure 9: Faster Study Delivery



Y-axis is new capacity added relative to the status quo. X-axis is the average wait time from first study issue date to the receipt of the final study. Each point on the line corresponds to either the status quo or an increase in the arrival probability of the second and third studies. From right to left, the points on each line are the status quo, 5%, 10%, . . . , 25%. The solid line shows the change in total generation capacity, while the dotted line shows the change in renewable generation capacity.

higher-queued generators, and we can move up the queue position of a lower-queued generator by reducing these weights. We consider the following maximization problem:

$$\max_w \sum_{t,c,\tau,x} \rho_t(c, \tau, x) \cdot (1 - \Psi_t(c, \tau, x)) \cdot \text{cap}_x, \quad (19)$$

where w is the vector of weights, $\rho_t(c, \tau, x)$ is the number of generators with characteristics x and final study cost estimate c in period t after having waited τ periods, and cap_x is the capacity of these generators. This quantity ρ is based on the equilibrium queue status and generator withdrawal probabilities, both of which depend on the weights w .³⁰

A planner may value some generators more than others. For example, a planner may favor non-renewable generators to improve grid reliability, or renewables for their environmental benefits.³¹ We also consider algorithms that maximize the following, more flexible objective

³⁰In this exercise, we view the H functions as structural parameters reflecting the processing constraints when PJM conducts studies. For example, a grid operator that faces multiple waiting generators may have to study them sequentially, finishing one generator before moving on to the next. Alternatively, it may be able to parallelize and simultaneously work on multiple generators at the same time. We estimate the study process through the H functions. If the study process is strictly sequential, and a lower-queued generator has high capacity but might leave the queue after prolonged waiting, then moving up this generator's rank and studying it first may increase the total completed capacity.

³¹It is not obvious the planner would put a higher weight on renewables given these generators are already subsidized at the state and federal level. A grid operator we spoke with was concerned that too little dispatchable generation capacity was being completed to maintain reliability in the face of policy-induced coal generator retirements.

function:

$$\max_w \sum_{t,c,\tau,x} \rho_t(c, \tau, x) \cdot (1 - \Psi_t(c, \tau, x)) \cdot \text{cap}_x \cdot \theta_x, \quad (20)$$

where θ_x reflects the planner's preference for type x generators. We consider three sets of planner preference parameters, where θ s on renewables and other generators are $(0.5, 0.5)$, $(0.75, 0.25)$ and $(0.9, 0.1)$. Maximizing the objective in (20) under the preference parameters of $(0.5, 0.5)$ amounts to maximizing (19). The maximization is also subject to optimality conditions 9 through 12 and a set of modified balance conditions in Appendix C.3.

In our implementation, a generator has the same priority as other generators with the same fuel type, in the same entry year range $\{< 2015, [2015, 2018), \geq 2018\}$ and the same size range $\{< 20\text{MW}, [20\text{MW}, 50\text{MW}), [50\text{MW}, 100\text{MW}), \geq 100\text{MW}\}$. We use this discretization to simplify the optimization problem, but we could also allow the weights to differ across finer categories of generator characteristics or compute a dynamic queuing rule with time-varying weights.

We find that these alternative queuing mechanisms meaningfully increase completed capacity. In Table 7, when a planner equally values renewable and non-renewable generation capacity (Column (1)), we find an increase of 7.94 GW in total capacity, 1.48 GW of which is renewable. When the planner prefers renewables (Columns (2) and (3)), the completed renewable capacity increases but the total added capacity is considerably smaller.

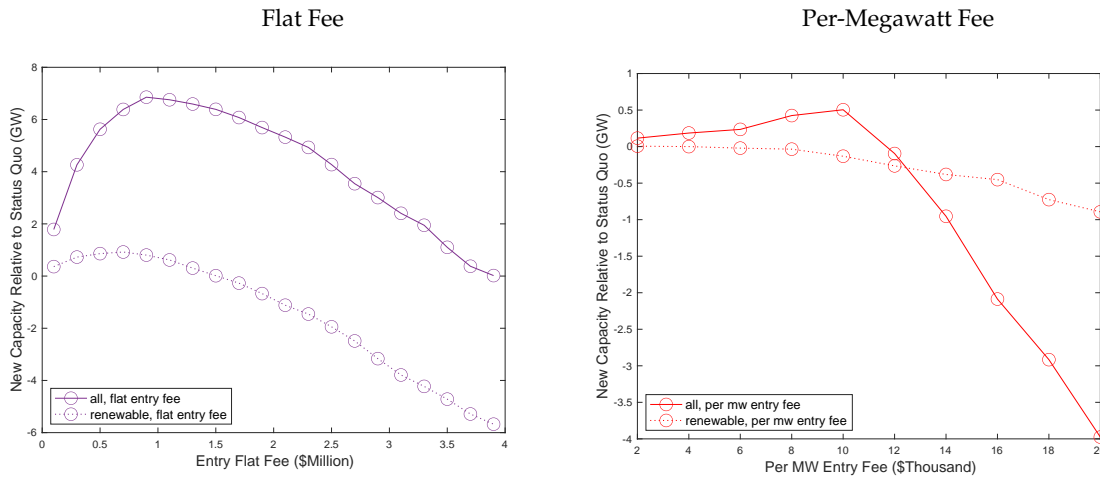
The queuing mechanisms remove many small generators from the queue. Table 8 shows the percentage of removed generators within each fuel-size group. With equal preferences for the renewable and non-renewable generators, many generators below 100 MW are screened out. As the planner prefers renewable capacity more, the mechanism removes fewer renewable generators with a capacity between 20 and 100 MW but still removes more than 45% of renewable generators under 20MW. More medium sized non-renewable generators are also removed. Under all preference parameters, fewer but larger generators complete interconnection.

9.3 Entry Fees

We consider two types of entry fees, defined as the cost to enter the queue (obtain the first study). The first type is a flat per generator fee. The second type is assessed per megawatt.

For both types of entry fee, we find an inverted-U relationship between the added capacity

Figure 10: Added Capacity with Entry Fee



Y-axis is new capacity added relative to the status quo. X-axis is the fee to enter the queue and receive the first study. The solid line shows the change in total generation capacity, the dotted line shows the change in renewable generation capacity.

and fee levels (Figure 10). The flat fee that maximizes completed capacity is \$900,000. It would add over 6.85 GW of capacity, but only 0.8 GW of renewable capacity. It also decreases the number of completed generators by 40%.³² The per-megawatt fee achieves a much smaller effect, adding at most 0.5 GW of capacity. None of the generators added by the per-megawatt fee is a renewable generator.

Table 9 breaks down which potential generators decide not to enter the queue at the flat fee level that maximizes completed capacity. Compared with the alternative queuing mechanisms above, the fee screens out many more small generators and more renewable generators compared to non-renewable generators resulting in a lower completed capacity.

We also simulate an increase in the fees for later studies. We again consider both flat and per megawatt fees, and assume the same increase in fee is levied for both the second and third study. Screening at this later stage is less effective: completed capacity falls for all fee levels. Appendix D.1 provides more details.

Climate Impacts
We found that several policy reforms would significantly increase renewable generation capacity, an increase that would offset electricity production from fossil fuel generators. To quantify the approximate impact of this investment on carbon emissions, we use the U.S. Environmental Protection Agency’s Avoided Emissions and Generation Tool (AVERT). This tool translates changes in generation capacity into changes in CO₂ emissions using data on regional demand, production costs, and market dispatch (US EPA, 2022). We value these emis-

³²In PJM’s 2022 reforms, the collected entry fees will be refunded to generators that complete interconnection. We do not account for these refunds in our simulations.

sions using the social cost of carbon of \$185 per ton of CO₂ in Rennert et al. (2022).

Additional renewable generation capacity would produce large social benefits from avoided carbon emissions. For example, increasing the study arrival probability by 10% results in 1.58 GW more renewable capacity. The AVERT tool calculates that adding 1.58 GW of utility-scale renewable generation capacity to the Mid-Atlantic region in 2022 would decrease annual CO₂ emissions by 2.14 million metric tons.³³ The implied annual social value of this reduction is 394 million dollars. The more conservative social cost of carbon used by the U.S. government (\$51 per ton) implies a social value is 109 million dollars. Our other simulations find gains in renewable capacity in the range of 0.8-3.5 GW. AVERT shows that CO₂ emissions are offset roughly at the rate of 1.4 million metric tons per gigawatt in this range.

10 Conclusion

We use novel data from the largest transmission operator in the United States to study the interconnection queue. We find there is a congestion externality. If a generator has more generators ahead of it in the queue, the probability it receives the third and final study in a given quarter falls. We also find that interconnection costs are hard to predict and are a key factor in generators' decisions to withdraw from the queue.

We next study policy reforms using a dynamic model that accounts for equilibrium effects. Given the congestion effects, we next ask whether removing some generators can increase the amount of generation capacity completed. Alternative queuing policies prioritize larger generators and increase completed capacity. A flat fee to enter the queue has a similar effect, though this increase disproportionately comes from non-renewable generators. The increase in renewable capacity we see under this policy still has substantial environmental benefits.

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³³We assume the composition of this 1.58 GW increase is one third wind and two thirds solar, matching the roughly 2 to 1 ratio of solar to wind capacity in our sample.

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A Allocation of Shared Network Upgrades

There are two main types of interconnection costs: direct connection costs and network upgrades. While we collect costs separately for each of the major categories listed in the study, it is not always easy to distinguish between direct costs and network upgrades, and we combine both types into one cost measure for our analysis.

Network upgrades are often shared among multiple generators. A generator’s contribution to these shared costs is typically first reported in the second (system impact) study. The first (feasibility) study will note that the generator may be responsible for a contribution toward these costs and will often report the total. Figure A.1 shows a typical example. The generator will likely be responsible for a portion of the 17.75 million, and an estimate of its exact responsibility will be provided in the next study. For this example, the first study cost we use in estimation is 7.85 million. This generator will also have the variable *s1 cluster* set to one because the first study indicates the generator may be responsible for additional costs and lists a non-zero total for these costs.

Figure A.1: Example cost breakdown for the first study

The AD1-034 project will be responsible for the following costs:

Description	Total Cost
Attachment Facilities	\$ 1,550,000
Direct Connection Network Upgrades	\$ 5,500,000
Non Direct Connection Network Upgrades	\$ 800,000
Total Costs	\$ 7,850,000

In addition, the AD1-034 project may be responsible for a contribution to the following costs:

Description	Total Cost
New System Upgrades	\$ 0
Previously Identified Upgrades	\$ 17,500,000
Total Costs	\$ 17,750,000

B Prior Generator Cost and Entry

In our analysis, we do not consider how interconnection studies provide information that affects the entry decisions of future generators. Specifically, high costs in a location may cause entrants to substitute to other locations. Alternatively, suppose a recent upgrade to the

infrastructure made by one generator lowers the cost for the next generator. Then, locations where a generator with a high interconnection cost may be about to complete interconnection would be desirable. PJM's cost-sharing makes this second channel less likely.³⁴

To assess the empirical relevance of this concern, we first look at the region-level time-series of interconnection costs and entry. Figure B.1 shows the time series of mean study 2 costs for the nineteen transmission owner territories in PJM. The time period is the half-year. We focus on the study 2 cost because it is an important source of information: this is the first study to include a generator's contribution to shared network upgrade costs, and it is more widely available than study 3. High costs do not appear to result in either higher or lower entry in subsequent periods.

We next estimate the effect of prior study costs on entry at the same point of interconnection. The estimation sample consists of all substation-quarters where the second study cost of a higher-queued generator is available, i.e., locations where a prior entry has made it to at least the second study. The outcome variable is an indicator for whether entry occurs in quarter t at this location.³⁵ We regress this variable on whether the most recent study 2 cost at that substation exceeds \$0.1 million/MW. We also include three measures of grid-operator transmission investment (RTEP) affecting the substation,³⁶ the voltage of the transmission line at the substation, and the locational marginal price (LMP). To construct our measure of the LMP, we use a quarterly average of hourly prices for peak hours (7am-11pm) for three days each month (10th, 20th, and 30th, if available, else the 28th). We condition on state-year-quarter fixed effects to control for changes in state-level incentives and time trends.

We estimate that prior costs have a small effect on entry relative to other factors. These estimates are reported in Table B.1. The effect of the prior generator's study 2 cost is not precisely estimated, with a 95% confidence interval from -0.006 to 0.0179, which are -8% to 25% of the mean entry rate. Baseline RTEP investment has a larger effect: cumulative investment greater than \$100,000 is associated with 30% increase in the entry rate. Supplemental RTEP investment and cumulative investment since the most recently completed generator have small effects. Generators also tend to enter at higher voltage substations. Finally, a one standard deviation (\$12/MWh) increase in the LMP is associated with a 160% increase in the mean

³⁴Empirically, we find little evidence a costly completed interconnection reduces the cost for the subsequent generator once we control for whether the subsequent generator is an uprate.

³⁵If a generator requests to interconnect by tapping into a line instead of at a substation, we assign the request to the nearest substation.

³⁶We use data from PJM on the planned and completed transmission investment. These data list which substations will be affected by each investment.

entry rate.

C Equilibrium Simulation

C.1 Preliminaries

Each potential generator i is associated with a queue date t_i . If the generator decides to enter the queue, it receives the first study. In the calendar time periods $t_i + 1, t_i + 2, \dots, t_i + T_0$, if the generator has not received the final study, the generator decides whether to wait or continue. At the end of $t_i + T_0$, if the generator has not received the final study, the generator leaves the queue.

In the simulation, we solve for a vector of values $n_i(\ell, z, \tau, \tilde{\tau}, k)$, which is the fraction of generator i with a cost estimate in bin ℓ (Appendix 7.2.1), study information z , having waited τ periods, $\tilde{\tau}$ periods from the last study, and waiting for k th study. We do not need the x in the argument because the simulation is done for each potential entrant i in the set \mathcal{X} . We also do not need the calendar time index because the calendar time at τ is $t_i + \tau$. In our solution, $n_i(\ell, z, \tau, \tilde{\tau}, k) \in [0, 1]$ is a fraction. Ignoring the integer constraint greatly simplifies the simulation process. In particular, we treat, for example, uncertain arrivals of studies as fractions of the waiting generator receiving studies over multiple periods. Removing stochasticity allows us to tractably model the equilibrium. For the study information z^{test} , we set the variable to 1 in all subsequent studies if PJM performs the corresponding tests in a study.

C.2 Simulation Steps

- Initialization
 - We start with an initial guess of $n_i(\ell, z, \tau, \tilde{\tau}, k)$, where n_i is the fraction of a potential generator i in a particular state and ℓ indicates the ℓ th cost bin. We use the observed data as the starting point. For example, if a generator i with 1 study, cost $c \in C_\ell$ and information z waited 2 periods and exited the queue, then $n_i(\ell, z, \tau = 1, \tilde{\tau} = 1, k = 1) = 1$, $n_i(\ell, z, \tau = 2, \tilde{\tau} = 2, k = 1) = 1$, and 0 for any other input values.
 - Use the initial n_i , compute the probabilities implied by H_1, H_2, \tilde{H}_2 and H_3 . The only additional input we need is the queue state for each i . We use y_{it} to denote i 's queue state. All of the queue states we include in the H functions are computable from the observed outcomes in data. For example, the queue size at the calendar

time t , is calculated as

$$\sum_k \sum_{\tilde{\tau}} \sum_{\tau} \sum_{\ell} \sum_z \sum_i n_i(\ell, z, \tau, \tilde{\tau}, k) \mathbb{1}(t_i + \tau = t).$$

- Given the predicted probabilities (v_i, p_i, q_i, r_i) based on the H functions, we solve the Bellman equations and the corresponding withdrawal probabilities for each generator i , Υ_i , Λ_i , Ψ_i and Ξ_i for each combination of $(\ell, z, \tau, \tilde{\tau})$. To simplify notation, we omit queue state y_{it} and generator characteristics x_i from the arguments of these functions.

- Iteration

1. Use the study transition probabilities predicted by H and withdrawal probabilities $(Y_i, \Lambda_i, \Psi_i, \Xi_i)$ to update n_i . Specifically, for those with two studies and waiting for the third study and for any ℓ and z ,

$$\begin{aligned} & n_i(\ell, z, \tau + 1, \tilde{\tau} + 1, k = 2) \\ &= n_i(\ell, z, \tau, \tilde{\tau}, k = 2) \cdot (1 - \Lambda_i(\ell, z, \tau, \tilde{\tau})) \\ & \cdot \left(1 - \sum_{\ell'} r_i(\ell'; c, z, \tau, \tilde{\tau}) \right). \end{aligned}$$

In the first period after receiving the second study,

$$\begin{aligned} & n_i(\ell, z, \tau + 1, \tilde{\tau} = 1, k = 2, x) \\ &= \sum_{\ell', z', \tilde{\tau}'} n_i(\ell', z', \tau, \tilde{\tau}', k = 1) \\ & \cdot (1 - Y_i(\ell', z', \tau, \tilde{\tau}')) \cdot q_i(\ell, z; \ell', z', \tau, \tilde{\tau}'). \end{aligned}$$

For those with one study and waiting for the second study and for any ℓ and z ,

$$\begin{aligned} & n_i(\ell, z, \tau + 1, \tilde{\tau} + 1, k = 1) \\ &= n_i(\ell, z, \tau, \tilde{\tau}, k = 1) \cdot (1 - Y_i(\ell, z, \tau, \tilde{\tau})) \\ & \cdot \left(1 - \sum_{\ell', z'} q_i(\ell', z'; \ell, z, \tau, \tilde{\tau}) - \sum_{\ell'} p_i(\ell'; \ell, z, \tau, \tilde{\tau}) \right). \end{aligned}$$

The entry process implies that

$$n_i(c, z, \tau = 1, \tilde{\tau} = 1, k = 1) = v_i(c, z) \cdot (1 - \Xi_i).$$

2. Update the queue status y_t , using n_i as the number of generators in a particular state.
3. Update the study transition and withdrawal probabilities.
4. Iterate until convergence.

C.3 Balance Conditions in Alternative Mechanisms

We use $w_{t,x}$ to denote the weight for a generator of characteristics x and entry time t . The balance conditions are:

1. For generators with two studies and waiting for the third study,

$$\begin{aligned} & N_{t+1}m_{t+1}(c, z, \tau + 1, \tilde{\tau} + 1, k = 2, x) \\ &= N_t m_t(c, z, \tau, \tilde{\tau}, k = 2, x) \cdot (1 - \Lambda_t(c, z, \tau, \tilde{\tau}, x)) \\ & \cdot \left(1 - \sum_{c'} r_t(c'; c, z, \tau, \tilde{\tau}, x) w_{t-\tau, x} \right). \end{aligned} \quad (\text{C.1})$$

2. For generators just receiving the second study,

$$\begin{aligned} & N_{t+1}m_{t+1}(c, z, \tau + 1, \tilde{\tau} = 1, k = 2, x) \\ &= N_t \sum_{c', z', \tilde{\tau}'} m_t(c', z', \tau, \tilde{\tau}', k = 1, x) \\ & \cdot (1 - Y_t(c', z', \tau, \tilde{\tau}', x)) \cdot q_t(c, z; c', z', \tau, \tilde{\tau}', x) w_{t-\tau, x}. \end{aligned} \quad (\text{C.2})$$

3. For generators with one study and waiting for the second study ($\tau > 0$),

$$\begin{aligned} & N_{t+1}m_{t+1}(c, z, \tau + 1, \tilde{\tau} + 1, k = 1, x) \\ &= N_t m_t(c, z, \tau, \tilde{\tau}, k = 1, x) \cdot (1 - Y_t(c, z, \tau, \tilde{\tau}, x)) \\ & \cdot \left(1 - \sum_{c', z'} q_t(c', z'; c, z, \tau, \tilde{\tau}, x) w_{t-\tau, x} - \sum_{c'} p_t(c'; c, z, \tau, \tilde{\tau}, x) w_{t-\tau, x} \right). \end{aligned} \quad (\text{C.3})$$

4. The boundary condition (entry):

$$N_t m_t(c, z, \tau = 1, \bar{\tau} = 1, k = 1, x) = v_t(c, z; x) n_t(x) (1 - \bar{\Xi}_t(x)) w_{t,x}. \quad (\text{C.4})$$

D Additional Counterfactual Results

D.1 Additional Detail on Study Fees

Figure D.1 shows that the added capacity falls at every level for both types of study fees. There are two key distinctions from the entry fee, which we find can increase completed capacity. First, the additional study fees may cause large generators with a high interconnection cost identified in study 1 to drop out, but small generators with a low study 1 cost to stay in the queue. Second, generators that wait long enough to request the third study are those that are more likely to complete interconnection, and screening at this stage becomes less effective. As a result, these fees do not sufficiently protect the incentives of large generators to remain in the queue and lead to an overall reduction in the completed capacity.

E Additional Figures and Tables

Table 5: Effects of Prior Completions on Entry

	Same substation	<10km	<50km
Prior Interconnection	-0.001 (0.006)	-0.006 (0.003)	0.001 (0.002)
Costly Prior Interconnection	0.001 (0.010)	0.007 (0.005)	0.001 (0.003)
Cumulative RTEP Baseline Investment > \$0.1 million	0.012*** (0.004)	0.016*** (0.004)	0.016*** (0.004)
Cumulative RTEP Supplemental Investment > \$0.1 million	0.006 (0.004)	0.008** (0.004)	0.009** (0.004)
Cumulative RTEP Since Most Recently Completed Generator > \$0.1 million	0.001 (0.005)	-0.004 (0.004)	-0.004 (0.005)
Voltage > 230kV	0.011*** (0.002)	0.010*** (0.003)	0.014*** (0.004)
Prior Interconnection × Voltage > 230kV	0.021** (0.009)	0.010** (0.005)	-0.002 (0.005)
LMP (\$/MWh)	0.000 (0.000)	0.000 (0.000)	0.000 (0.000)
Mean of dependent var.	0.043	0.043	0.043
N	88,374	88,374	88,374

Observations are at the substation by quarter level for 2011-2020. The sample includes all substations that have ever had a prior interconnection request since 2008. The dependent variable is an indicator for entry into the queue at that substation in that quarter. Prior Interconnection indicates whether there is a prior project completed at that substation before that quarter. Costly Prior Interconnection indicates whether the most recently completed project has a cost > \$0.1 million/MW. Cumulative RTEP Baseline Investment > \$0.1 million is an indicator for if the cumulative amount of baseline transmission investment completed since 2008 and affecting that substation is greater than \$100,000. Cumulative RTEP Supplemental Investment > \$0.1 million is an indicator for if the cumulative amount of supplemental transmission investment completed since 2008 and affecting that substation is greater than \$100,000. Cumulative RTEP Investment > \$0.1 million is an indicator for if the cumulative amount of either type of RTEP investment since the last connecting generator at the substation was completed is greater than \$100,000. Voltage > 230kV is an indicator for if the voltage of the substation is greater than 230 kV. Prior Interconnection × Voltage > 230kV is the interaction term between Prior Interconnection and Voltage > 230kV. LMP is a quarterly average of the nearest locational marginal price at peak hours in 2020 (\$/MWh). The regression includes state-year-quarter fixed effects. Standard errors are in parentheses and clustered by substation. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table 6: Profit Function Parameter Estimates (\$1,000/MW)

	(1) Baseline	(2) Heterogeneity
Capacity (MW)		
10-20	52.30 (12.10)	45.42 (11.16)
20-100	88.12 (12.68)	85.83 (12.58)
>100	32.16 (14.87)	32.78 (14.91)
Renewable	-100.31 (22.67)	-100.56 (21.66)
$\sigma_{\text{substation}}$		69.85 (6.97)

Estimated parameters for the profit function in \$1,000 of 2020 dollars per MW. Renewable is an indicator for being a wind or solar generator. SE in parentheses. (2) Heterogeneity is a specification that includes random effects at the nearest substation level. $\sigma_{\text{substation}}$ is the standard deviation of this random effect. We also include entry year and year fixed effects at the 3-year level, state fixed effects, and fixed effects for the number of quarters in the queue. Appendix Table E.14 reports estimates for other profit function parameters.

Table 7: Added Capacity in Alternative Queuing Mechanisms (GW)

	Planner Preference Parameter ($\theta_{\text{renewable}}, \theta_{\text{non-renewable}}$)		
	(0.5, 0.5)	(0.75, 0.25)	(0.9, 0.1)
Added Capacity	7.94	4.09	0.08
Renewable	1.48	2.66	3.02
Non-Renewable	6.46	1.43	-2.94

Table reports new capacity added relative to the status quo for generators in our sample. The model-predicted total completed capacity in the status quo is 71.15 GW, 32.44GW of which is renewable.

Table 8: Percentage of Generators Removed by Alternative Queuing Mechanisms

	Planner Preference Parameter ($\theta_{\text{renewable}}, \theta_{\text{non-renewable}}$)		
	(0.5, 0.5)	(0.75, 0.5)	(0.9, 0.1)
Renewable Capacity (MW)			
<20	72.31	45.02	67.06
20-100	51.76	25.73	23.81
>100	1.19	0.00	0.00
Non-Renewable Capacity (MW)			
<20	55.97	56.24	56.24
20-100	57.12	77.17	73.08
>100	0.00	8.52	28.05

Table reports the share of generators in a group that are removed by each queuing mechanism. For example, 72.31% of generators whose sizes are below 20MW are removed when the planner preference parameters for the renewable and non-renewable generators are 0.5 and 0.5.

Table 9: Generators that No Longer Enter the Queue with a Flat Fee=\$900,000

% of Group	Entry Year			
	<2013	2013-2015	2016-2018	>2018
Renewable Capacity (MW)				
<20	92.11	98.18	94.77	95.98
20-100	69.27	70.59	30.63	40.22
>100	1.92	0.00	0.00	0.00
Non-Renewable Capacity (MW)				
<20	93.70	85.06	91.73	87.97
20-100	29.07	22.92	44.68	12.82
>100	0.90	0.00	0.00	0.00

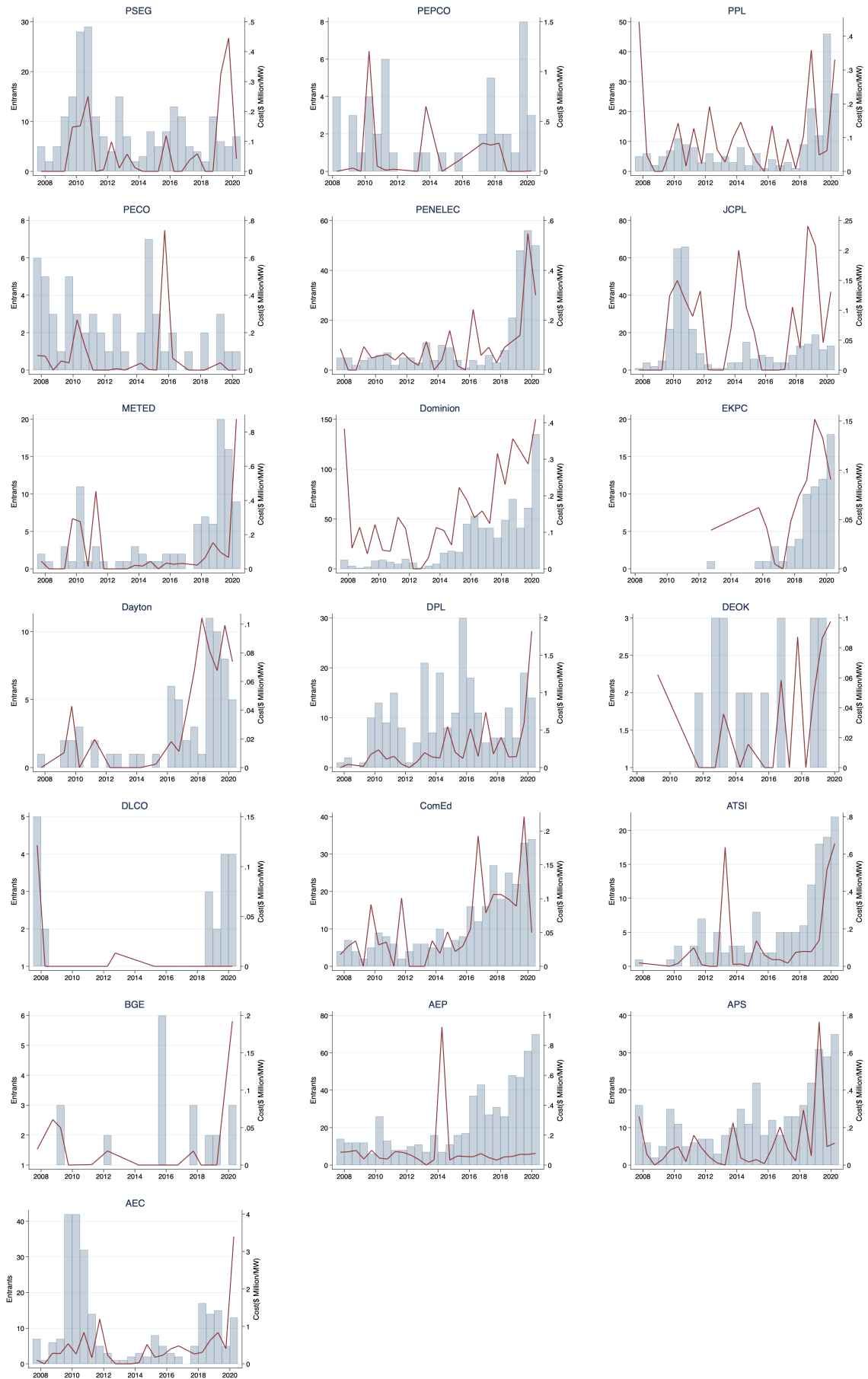
Table reports the share of generators in a group that no longer enter the queue when there is a \$900,000 per generator entry fee. For example, 92.11% of generators that entered the queue from 2008-2012 and whose sizes are below 20MW no longer enter the queue.

Table B.1: Effect of Interconnection Costs on Entry at the Same Substation

Most Recent Study 2 Cost>\$0.1 million/MW	0.0059 (0.0061)
Cumulative RTEP Baseline Investment>\$0.1 million	0.0228 (0.0081)
Cumulative RTEP Supplemental Investment>\$0.1 million	0.0011 (0.0080)
Cumulative RTEP Since Most Recently Completed Generator>\$0.1 million	-0.0014 (0.0087)
Voltage>230kV	0.0234 (0.0065)
LMP (\$/MWh)	0.0097 (0.0004)
Mean of dependent var.	0.0729
N	17,428

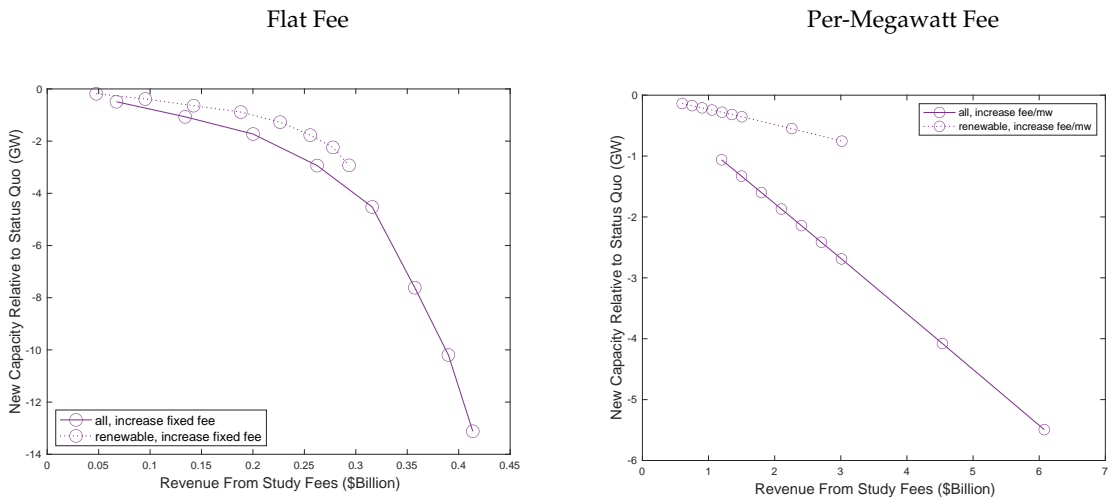
Observations are at the substation by quarter level for 2008-2020. Sample is all substation-quarters where a prior second study interconnection cost is available (N = 17,428; 1981 unique substations). Dependent variable is an indicator for entry into the queue at that substation in that quarter. Cumulative RTEP Baseline Investment>\$0.1 million is an indicator for if the cumulative amount of baseline transmission investment completed since 2008 and affecting that substation is greater than \$100,000. Cumulative RTEP Supplemental Investment>\$0.1 million is an indicator for if the cumulative amount of supplemental transmission investment completed since 2008 and affecting that substation is greater than \$100,000. Cumulative RTEP Investment>\$0.1 million is an indicator for if the cumulative amount of either type of RTEP investment since the last connecting generator at the substation was completed is greater than \$100,000. Voltage>230kV is an indicator for if the voltage of the substation is greater than 230 kV. LMP is a quarterly average of the nearest locational marginal price at peak hours in 2020 \$/MWh. Regression includes state-year-quarter fixed effects. SE in parentheses, clustered by substation.

Figure B.1: Mean Study 2 Costs and Entry in Each Transmission Owner Territory



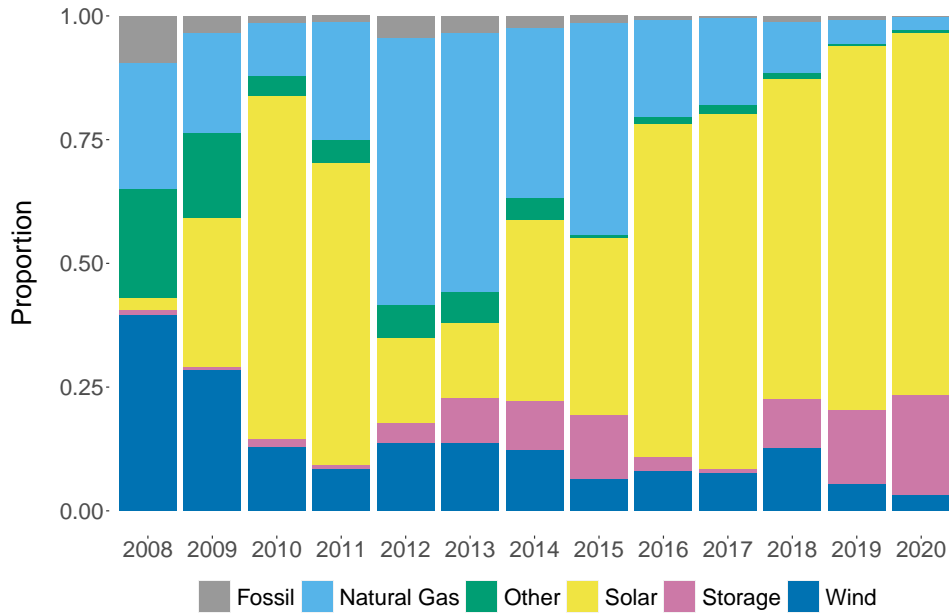
The bar graph (left y-axis) shows the number of entrants in a transmission owner territory by year, and the red line (right y-axis) shows the average study 2 costs for studies issued in that territory by year.

Figure D.1: Added Capacity with Increased Study Fee



Y-axis is new capacity added relative to the status quo. X-axis is the increase in fees for the second and third studies (we assume both are increased by the same amount). The solid line shows the change in total generation capacity, the dotted line shows the change in renewable generation capacity.

Figure E.1: Fuel type of generators entering the queue



Proportion of new generator interconnection requests by fuel type. Fossil is coal, oil, and diesel; other is biomass, nuclear, hydro, and wood.

Table E.1: Full Summary Statistics

	Study 1		Study 2		Study 3	
	Mean	Std. Dev.	Mean	Std. Dev.	Mean	Std. Dev.
Cost per MW	0.12	0.40	0.18	0.48	0.11	0.18
... $\leq 0.01m$	0.41	0.49	0.27	0.44	0.16	0.37
... (0.01m, 0.05m]	0.20	0.40	0.21	0.41	0.31	0.46
... (0.05m, 0.1m]	0.14	0.35	0.17	0.38	0.22	0.42
... $> 0.1m$	0.25	0.43	0.35	0.48	0.30	0.46
Wait time (mos.)	5.3	2.8	12.9	11.6	18.9	13.1
Size in MW	97	196	105	190	161	273
... ≤ 10	0.28	0.45	0.17	0.37	0.09	0.29
... 10-20	0.26	0.44	0.27	0.44	0.24	0.43
... 20-100	0.24	0.43	0.32	0.47	0.35	0.48
... 100-500	0.17	0.38	0.19	0.40	0.22	0.42
... > 500	0.05	0.21	0.05	0.21	0.10	0.30
Uprate	0.21	0.41	0.23	0.42	0.16	0.37
Revision	0.04	0.20	0.19	0.39	0.18	0.39
Requested energy in MW	97	196	104	191	160	273
Requested capacity in MW	66	173	68	164	120	257
Solar	0.60	0.49	0.60	0.49	0.59	0.49
Natural Gas	0.17	0.37	0.16	0.36	0.22	0.42
Wind	0.09	0.29	0.10	0.30	0.12	0.32
Battery	0.10	0.30	0.10	0.30	0.04	0.19
Coal, oil, diesel	0.02	0.13	0.01	0.12	0.01	0.08
Other	0.03	0.18	0.03	0.17	0.03	0.17
Cost sharing	0.04	0.19	0.59	0.49	0.59	0.49
Study 1 cost sharing	0.41	0.49	0.48	0.50	0.45	0.50
Receive engr. tests	0.81	0.39	0.88	0.32	0.04	0.20
Distance to substation (km)	4.77	13.92	4.44	11.73	4.45	12.35
Build new substation	0.22	0.41	0.27	0.44	0.46	0.50
Ordinance	0.28	0.45	0.30	0.46	0.29	0.46
Prior RTEP Investment (0m, 60m]	0.37	0.48	0.37	0.48	0.37	0.48
Prior RTEP Investment $> 60m$	0.15	0.36	0.16	0.37	0.21	0.41
N	4,138		2,472		692	

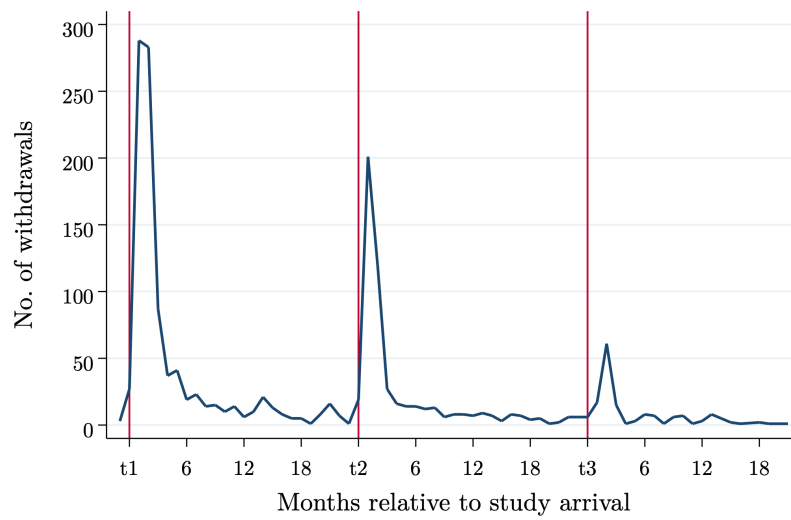
Generators entering the queue in 2008-2020. Costs in millions of 2020 dollars. Cost per MW is interconnection cost estimate divided by the generator's size in MW. Wait time for Study 1 is wait in months for the first study after joining the queue. Wait time for Study 2 is wait in months for second study after receiving the first study. Wait time for Study 3 is similarly defined. Size in MW is our measure of size which is the maximum of the requested energy and requested capacity. Uprate is an indicator for a capacity increase to an existing generator. Revision is an indicator for if the study was revised. Requested energy in MW is the associated energy resource for the interconnection request. Requested capacity in MW is the associated capacity resource for the interconnection request; all capacity resources must participate in PJM's capacity auction. Cost sharing is an indicator for if a generator shares costs with other generators. Study 1 cost sharing is an indicator for if the first study mentions shared network upgrade costs. Receive engr. tests is an indicator for receiving any of three engineering tests: generator deliverability, multiple facility contingency, and short circuit analysis. Distance to substation is the distance to the nearest substation in km. Ordinance is an indicator for a local ordinance restricting renewable energy development. Prior RTEP Investment is RTEP transmission investment made within 18 months of the issue date of a focal project and located within 10km of it.

Table E.2: Predictors of Interconnection Costs

	IHS Cost (1)	Low Study Cost (2)
Project Size Bin 1 (10MW, 20MW]	-0.049** (0.025)	0.009 (0.027)
Project Size Bin 2 (20MW, 100MW]	-0.020 (0.026)	-0.134*** (0.027)
Project Size Bin 3 (100MW, 500MW]	-0.028 (0.027)	-0.168*** (0.030)
Project Size Bin 4 >500MW	-0.056* (0.030)	-0.210*** (0.051)
Distance To Substation:	0.003 (0.004)	-0.007 (0.005)
Ordinance	0.029 (0.019)	-0.043* (0.022)
Uprate	-0.055*** (0.021)	0.494*** (0.029)
Fuel-Natural Gas	-0.044 (0.053)	0.104 (0.078)
Fuel-Solar	-0.026 (0.054)	-0.122 (0.080)
Fuel-Wind	-0.031 (0.060)	-0.034 (0.084)
Fuel-Storage	-0.028 (0.055)	-0.051 (0.081)
Fuel-Other	-0.032 (0.063)	0.129 (0.098)
Prior RTEP Investment (0m, 60m]	-0.012 (0.015)	0.035** (0.017)
Prior RTEP Investment >60m	-0.015 (0.022)	0.056** (0.026)
Observations	2,432	2,432
R-Squared	0.122	0.421

Projects queuing from 2008-2020. SEs in parentheses; clustered by substation. In column (1), Dep. var. is the inverse hyperbolic sine transformation of Study 2 interconnection cost estimate (mean 0.14). In column (2), Dep. var. is indicator for Study 2 cost estimate less than 0.01m/MW (mean 0.27). Prior RTEP Investments is measured as investments made within 18 months of the issue date of a focal project and located within 10km of it. Controls for state, the year of queue entry and the year the study is issued. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

Figure E.2: Withdrawals Relative to Study Arrival



Number of generators withdrawing from the queue in each month relative to the arrival of their most recent study. t1 is the arrival of the first study. t2 is the arrival of the second study. t3 is the arrival of the third study. Excludes generators that withdrew two or more years after the arrival of their most recent study.

Table E.3: Withdrawal Regressions with Alternative Cost Measures

	Study 1		Study 2			Study 3	
	OLS	OLS	OLS	IV	IV	OLS	IV
<i>A. Continuous Measure</i>							
IHS cost	0.290*** (0.054)	0.290*** (0.054)	0.347*** (0.057)	0.350*** (0.074)	0.290*** (0.072)	0.457** (0.179)	0.092 (0.427)
<i>B. Cost bin specification</i>							
Low cost	-0.042 (0.025)	-0.043* (0.025)	-0.046 (0.050)			0.023 (0.076)	
Mid cost	-0.011 (0.027)	-0.010 (0.027)	-0.046 (0.052)			0.110 (0.086)	
High cost	0.107*** (0.027)	0.106*** (0.027)	0.198*** (0.046)			0.174** (0.083)	
Study 1 shared		X			X		
Mean dep. var.	0.28	0.28	0.43	0.43	0.43	0.43	0.43
First stage F				215	195		12
N	3,191	3,191	1,269	1,269	1,269	345	309

Generators queuing from 2011-2020; generators still active excluded. SEs in parentheses; clustered by substation. Dep. var. are indicators for projects withdrawing from the queue before receiving the next study or before beginning operation for generators with their final study. IHS cost is the inverse hyperbolic sine transformation of the study's interconnection cost estimate. IV results instrument for the IHS of cost using the change in the IHS of cost across studies. Low cost bin indicates an interconnection cost between 0.01 and 0.05 million dollars per MW. Mid cost bin indicates an interconnection cost between 0.05 and 0.1 million dollars per MW. High cost bin is a cost greater than 0.1 million dollars per MW. Study 1 shared indicates if the regression includes two variables from Study 1: an indicator for if the study mentions shared network upgrade costs and the log of the total costs to be shared. All specifications control for size (5 bins), fuel type, state, uprate, and FE for the year of queue entry and the year the study is issued. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table E.4: Withdrawal Regressions with Alternative Controls

	Study 1		Study 2			Study 3	
	OLS	OLS	OLS	IV	IV	OLS	IV
<i>A. Original specification</i>							
High cost	0.123*** (0.022)	0.123*** (0.022)	0.231*** (0.031)	0.293*** (0.054)	0.241*** (0.057)	0.113* (0.063)	0.074 (0.117)
Study 1 shared		X			X		
Mean dep. var.	0.28	0.28	0.43	0.43	0.43	0.55	0.55
First stage F				972	808		202
N	3,191	3,191	1,269	1,269	1,269	345	345
<i>B. Including permitting controls</i>							
High cost	0.123*** (0.022)	0.123*** (0.022)	0.230*** (0.031)	0.293*** (0.054)	0.241*** (0.057)	0.115* (0.064)	0.074 (0.118)
Study 1 shared		X			X		
Mean dep. var.	0.28	0.28	0.43	0.43	0.43	0.55	0.55
First stage F				948	788		199
N	3,191	3,191	1,269	1,269	1,269	345	345
<i>A. Including substation FE</i>							
High cost	0.108*** (0.031)	0.107*** (0.031)	0.275*** (0.049)	0.267*** (0.072)	0.246*** (0.075)	0.255* (0.134)	0.347* (0.176)
Study 1 shared		X			X		
Mean dep. var.	0.26	0.26	0.41	0.41	0.41	0.43	0.43
First stage F				365	326		18
N	2,413	2,413	759	759	759	138	138

Generators queuing from 2011-2020; generators still active excluded. Panel C. excludes generators that were the only generator connecting at that substation. SEs in parentheses; clustered by substation. Dep. var. are indicators for projects withdrawing from the queue before receiving the next study or before beginning operation for generators with their final study. Permitting controls are two variables: the log of the distance from the generator location to the nearest substation in kilometers and whether the county had an ordinance restricting renewable energy development. Study 1 shared indicates if the regression includes two variables from Study 1: an indicator for if the study mentions shared network upgrade costs and the log of the total costs to be shared. All specifications control for size (5 bins), fuel type, uprate, and FE for the year of queue entry and the year the study is issued. Panels A. and B. include state FE; Panel C. include substation FE. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table E.5: Robustness for Effect of a Costly Prior Interconnection on the Probability of Low Cost

	Threshold for Nearby Interconnections									
	Same substation and <10km		Same substation		<10km		<20km		<50km	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<i>A. Total cost > \$1m</i>										
Costly prior interconnection	0.015 (0.048)	0.095 (0.062)	-0.046 (0.035)	0.063 (0.051)	0.052 (0.032)	0.065 (0.045)	-0.015 (0.034)	0.059 (0.050)	-0.020 (0.042)	0.009 (0.052)
Substation FE		X		X		X		X		X
<i>B. Total cost > 90th percentile</i>										
Costly prior interconnection	-0.003 (0.072)	0.132 (0.100)	-0.056 (0.052)	0.045 (0.060)	0.054 (0.044)	0.052 (0.074)	-0.040 (0.055)	0.064 (0.073)	-0.036 (0.059)	-0.005 (0.107)
Substation FE		X		X		X		X		X
<i>C. Cost/MW > \$0.1m</i>										
Costly prior interconnection	-0.011 (0.076)	0.080 (0.111)	-0.029 (0.055)	0.116 (0.084)	0.036 (0.037)	0.063 (0.053)	-0.007 (0.039)	0.006 (0.052)	0.012 (0.036)	0.007 (0.046)
Substation FE		X		X		X		X		X
<i>D. Cost/MW > 90th percentile</i>										
Costly prior interconnection	-0.056 (0.092)	0.018 (0.139)	-0.026 (0.065)	0.097 (0.090)	0.006 (0.050)	0.090 (0.084)	-0.038 (0.074)	0.047 (0.108)	-0.001 (0.078)	-0.000 (0.110)
Substation FE		X		X		X		X		X
N	1,597	1,597	1,597	1,597	1,597	1,597	1,597	1,597	1,597	1,597

Projects queuing from 2011-2020. SEs in parentheses; clustered by substation. Dep. var. is an indicator for Study 2 cost estimate less than 0.01 m/MW (mean 0.31). Costly prior interconnection is an indicator for if the most recent nearby interconnection was costly. Each estimate corresponds to a separate regression with rows corresponding to different thresholds for costly and columns to different definitions of nearby. The 90th percentile for the cost of prior interconnection are 7.0, 8.6, 7.1, 7.2, and 9.4 million dollars for total cost and 0.15, 0.13, 0.18, 0.15, and 0.14 million dollars for cost per MW. All specifications control for whether there was no prior interconnection nearby, whether the generator is an uprate, size (5 bins), fuel type, state, and FE for the year of queue entry and the year the study is issued. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

Table E.6: Top 15 Developers and Selective Completion

Developer	No. of generators	Cohorts with a generator	Avg. gen. per cohort	Cohorts, excl. active	Frac. all or 0 completed
Invenergy	79	18	4.4	8	0.75
PSEG	53	17	3.1	17	0.53
Community Energy	52	17	3.1	11	0.64
Dominion	49	19	2.6	16	0.81
LS	39	18	2.2	12	0.83
EDF	30	12	2.5	6	0.83
Apex	28	13	2.2	6	0.67
NextEra	27	11	2.5	5	1
SunEnergy1	27	9	3	5	0.4
Urban Grid	27	6	4.5	0	-
EffiSolar	26	5	5.2	5	0.6
EDP	25	13	1.9	9	0.78
IMG	24	8	3	8	0.63
AEP	23	11	2.1	10	0.9
Exelon	20	10	2	9	0.89

Summary statistics for the top 15 developers in our sample by number of generators. Cohorts with a generator is the number of queue entry cohorts (out of 33) that the developer has a generator in. Cohorts, excl. active is the same but excludes cohorts where, as of August 2023, at least one of the developer's generators is still active, i.e., it has neither begun operation or withdrawn. Frac. all or 0 completed is the mean of a developer-cohort level indicator for if either all or none of the generators in that cohort were completed; this mean is taken across cohorts without active generators.

Table E.7: Summary Statistics: Entry and Prior Completions

	Same substation		<10km		<50km	
	Mean	Std. Dev.	Mean	Std. Dev.	Mean	Std. Dev.
Prior Interconnection	0.084	0.278	0.304	0.460	0.807	0.395
Costly Prior Interconnection	0.015	0.121	0.054	0.227	0.108	0.310
Cumulative RTEP Baseline Investment > \$0.1 million	0.307	0.461	0.307	0.461	0.307	0.461
Cumulative RTEP Supplemental Investment > \$0.1 million	0.198	0.399	0.198	0.399	0.198	0.399
Cumulative RTEP Since Most Recently Completed Generator > \$0.1 million	0.368	0.482	0.368	0.482	0.368	0.482
Voltage > 230kV	0.334	0.472	0.334	0.472	0.334	0.472
Prior Interconnection × Voltage > 230kV	0.042	0.201	0.140	0.347	0.292	0.454
LMP (\$/MWh)	35.804	10.643	35.804	10.643	35.804	10.643
Entry	0.043	0.203	0.043	0.203	0.043	0.203

Prior Interconnection indicates whether there is a prior project completed at that substation before that quarter. Costly Prior Interconnection indicates whether the most recently completed project has a cost > \$0.1 million/MW. Cumulative RTEP Baseline Investment > \$0.1 million is an indicator for if the cumulative amount of baseline transmission investment completed since 2008 and affecting that substation is greater than \$100,000. Cumulative RTEP Supplemental Investment > \$0.1 million is an indicator for if the cumulative amount of supplemental transmission investment completed since 2008 and affecting that substation is greater than \$100,000. Cumulative RTEP Investment > \$0.1 million is an indicator for if the cumulative amount of either type of RTEP investment since the last connecting generator at the substation was completed is greater than \$100,000. Voltage > 230kV is an indicator for if the voltage of the substation is greater than 230 kV. Prior Interconnection × Voltage > 230kV is the interaction term between Prior Interconnection and Voltage > 230kV. LMP is a quarterly average of the nearest locational marginal price at peak hours in 2020 (\$/MWh). The regression includes state-year-quarter fixed effects. Standard errors are in parentheses and clustered by substation. Entry is an indicator of new entry into the queue at that substation in that quarter.

Table E.8: Summary Statistics: Completions and Locational Marginal Prices

	Mean	Std.Dev.
Average locational marginal price	34.759	14.448
Completed interconnection	0.219	0.413
... > 20MW	0.128	0.334
... > 50MW	0.087	0.282
... > 100MW	0.067	0.250
Completed renewable interconnection	0.103	0.304
... > 20MW	0.043	0.203
... > 50MW	0.028	0.166
... > 100MW	0.020	0.141

Observations are at the substation by month-year level for 2016-2020. The sample includes all substations that have ever had a prior interconnection request. Average locational marginal price is measured during peak hours. Completed interconnection is an indicator of completed interconnections that change the completed capacity at the same substation. We also include indicators for completed interconnections that change the capacity by more than 20MW, 50MW, and 100MW. Completed renewable interconnection is an indicator of completed renewable interconnections that change the completed capacity at the same substation. Similarly, we include indicators for renewable interconnections that change the capacity by more than 20MW, 50MW, and 100MW.

Table E.9: PJM Decisions ($p_t^{\text{final}}, p_t^{\text{test}}, p_t^{\text{cluster}}$) and Study 1 Cost Distribution H_1

	Study 2 is Final	Probit Test	Cost Sharing	Ordered Probit Study 1 Cost
Last Study Cost (\$Million/MW)				
0.01-0.05	-0.47 (0.11)	-0.09 (0.27)	0.32 (0.09)	
0.05-0.20	-0.84 (0.11)	-0.12 (0.30)	0.31 (0.09)	
>0.20	-1.43 (0.15)	-0.13 (0.30)	-0.28 (0.14)	
Capacity (MW)				
10-20	-0.64 (0.10)	0.63 (0.21)	0.35 (0.11)	-0.34 (0.04)
20-100	-1.26 (0.13)	0.35 (0.24)	0.70 (0.12)	-0.12 (0.05)
>100	-2.03 (0.15)	0.90 (0.31)	0.85 (0.13)	-0.17 (0.05)
Renewable	-0.16 (0.09)	0.94 (0.26)	-0.23 (0.08)	0.81 (0.04)
ln Total MW in the Queue				
Withdrawn in the Past 2 Quarters, <100km	-0.09 (0.01)	0.04 (0.02)	0.01 (0.01)	0.03 (0.00)
Withdrawn in the Past 2 Quarters, Same TO	-0.15 (0.01)	-0.00 (0.03)	-0.00 (0.01)	0.04 (0.01)

We additionally control for state, year and entry year fixed effects. For the ordered probit, we estimate μ_3 and μ_4 to be 0.58, 1.57, with standard errors of 0.017 and 0.027.

Table E.10: Waiting Cost Parameter Estimates (\$1,000/MW/Quarter)

	(1) Baseline	(2) Heterogeneity
Renewable	2.83 (1.73)	2.08 (1.33)
Renewable × Capacity > 100MW	-1.75 (0.40)	-1.58 (0.33)
Entry Year > 2013	-2.93 (1.69)	-1.86 (1.37)
Year		
2013-2015	-1.29 (3.34)	-1.12 (2.47)
2016-2018	-3.90 (2.71)	-2.85 (2.13)
> 2018	4.92 (2.08)	3.12 (1.73)
$\tilde{\tau}$ Quarters after Receiving		
$\tilde{\tau} = 1$, Study 1	30.41 (8.40)	22.81 (6.24)
$\tilde{\tau} = 2$, Study 1	32.24 (9.57)	25.96 (7.23)
$\tilde{\tau} = 1$, Study 2	-19.42 (9.32)	-16.31 (7.37)
$\tilde{\tau} = 2$, Study 2	93.66 (10.37)	74.32 (8.14)
ln Capacity × $\tilde{\tau}$ Quarters after Receiving		
$\tilde{\tau} = 1$, Study 1	-1.07 (2.32)	-0.76 (1.71)
$\tilde{\tau} = 2$, Study 1	-0.40 (2.56)	-0.62 (1.95)
$\tilde{\tau} = 1$, Study 2	-1.00 (2.40)	-0.36 (1.91)
$\tilde{\tau} = 2$, Study 2	-7.52 (2.44)	-6.62 (1.89)
Waiting for Study 3	3.56 (0.65)	2.99 (0.52)

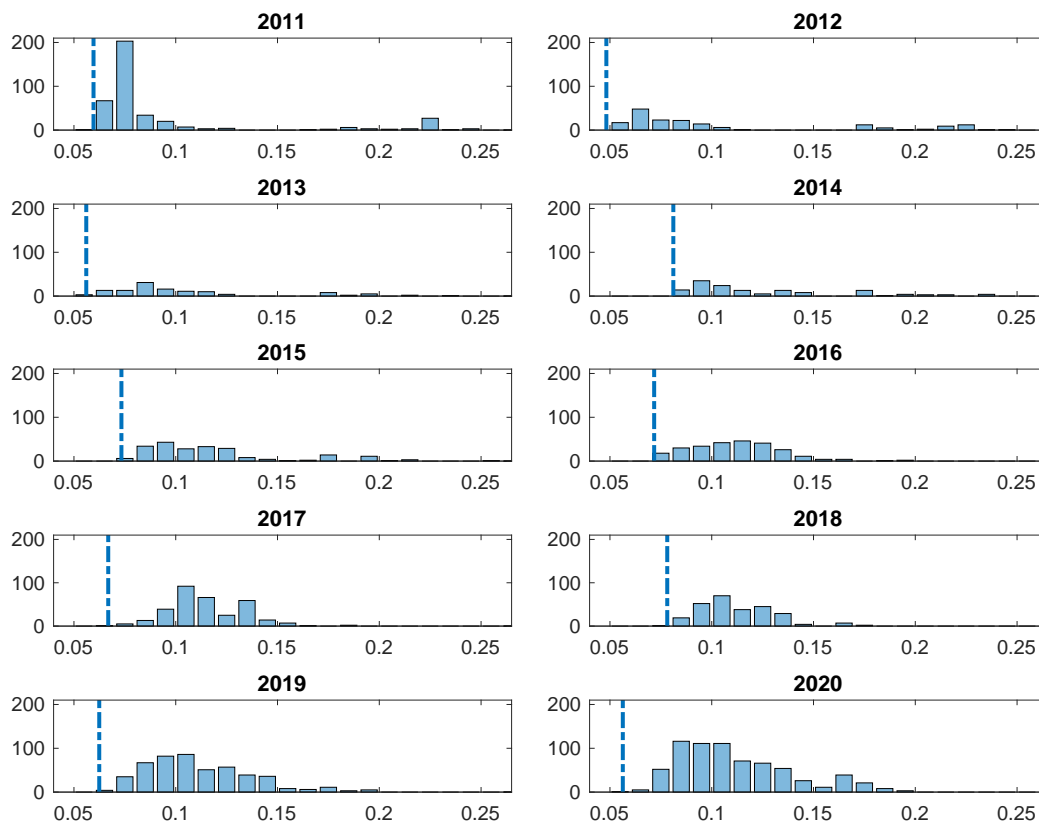
We additionally include entry year and year fixed effects at the 3-year level, state fixed effects and fixed effects for the number of quarters in the queue.

Table E.11: Marginal Effects of Increasing the Queue Sizes on Study 3 Arrival Probability

	Avg Arrival Prob	Δ Queue Position $\downarrow = 10\%$,	
		Δ Pr new study	Δ Pr new study SE
Renewable, ≤ 20 MW	0.068	-0.004	<0.001
Renewable, > 20 MW	0.053	-0.003	<0.001
Non-Renewable, ≤ 20 MW	0.093	-0.004	<0.001
Non-Renewable, > 20 MW	0.071	-0.003	<0.001

To calculate the Δ Pr new study we increase the number of higher queued generators by 10%.

Figure E.3: Expected Surplus of Entering the Queue and Cost of Entry



Plots of the distribution of the expected surplus from entering the queue by year. The vertical line indicates the lowest surplus of generators that entered in each year.

Table E.12: New Study Arrival Probit Model: Additional Estimates

	(1) Baseline	(2) Large Generators	(3) More Covariates
Last Study Cost (\$Million/MW)			
0.01-0.05	0.11 (0.04)	0.11 (0.04)	0.12 (0.04)
0.05-0.20	0.05 (0.04)	0.06 (0.04)	0.07 (0.04)
>0.20	-0.01 (0.05)	-0.00 (0.05)	-0.02 (0.06)
Has Tests (z^{test})	-0.12 (0.04)	-0.12 (0.04)	-0.13 (0.04)
Cost Sharing ($z^{\text{cost-sharing}}$)	0.04 (0.05)	0.03 (0.05)	0.01 (0.05)
ln # Projects in the Queue			
<10km			0.00 (0.02)
<100km			0.11 (0.04)
Same TO	-0.03 (0.02)	-0.03 (0.02)	-0.03 (0.02)
Withdrawn in the Past 2 Quarters, <100km			-0.04 (0.04)
Withdrawn in the Past 2 Quarters, Same TO			-0.02 (0.01)
Generator i Waiting for Third Study \times			
ln # Projects in the Queue \times			
Same TO	-0.14 (0.03)	-0.13 (0.03)	-0.13 (0.04)
Withdrawn in the Past 2 Quarters, <100km			-0.08 (0.07)
Withdrawn in the Past 2 Quarters, Same TO			-0.00 (0.01)
Wind/Solar	-0.04 (0.04)	-0.04 (0.04)	0.35 (0.11)
Wind/Solar \times Entry Year			
2013-2015			0.52 (0.17)
2016-2018			0.31 (0.20)
>2018			0.17 (0.23)
Wind/Solar \times Year			
>2013-2015			-0.60 (0.16)
>2016-2018			-0.51 (0.20)
>2018	0.06 (0.05)	0.07 (0.05)	-0.42 (0.23)
Wind/Solar \times Capacity (MW)			
10-20			-0.23 (0.10)
20-100			-0.19 (0.10)
100-500			-0.12 (0.11)
>500			-0.35 (0.16)
Capacity (MW)			
10-20			0.21 (0.08)
20-100			0.13 (0.08)
100-500	-0.73 (0.08)	-0.73 (0.08)	-0.53 (0.12)
>500	-0.63 (0.10)	-0.64 (0.10)	-0.34 (0.13)
Capacity > 100 \times Entry Year			
>2013-2015			-0.02 (0.16)
>2016-2018			-0.16 (0.19)
>2018			-0.34 (0.21)
Capacity > 100 \times Year			
>2013-2015	0.65 (0.10)	0.64 (0.10)	0.60 (0.15)
>2016-2018	0.60 (0.10)	0.60 (0.10)	0.66 (0.20)
>2018	0.52 (0.09)	0.52 (0.09)	0.70 (0.22)

We additionally include entry year fixed effects, year fixed effects, number of quarters in the queue fixed effects and their interactions with whether the generator is waiting for its third study, state fixed effects, indicators for whether the generator is an uprate, waiting for its third study, and study 1 indicates the generator might later share costs with others.

Table E.13: Ordered Probit Model: Cost Estimates

	(1) Baseline	(2) Large Generators	(3) More Covariates
Last Study Cost (\$Million/MW)			
0.01-0.05	0.49 (0.08)	0.49 (0.08)	0.51 (0.09)
0.05-0.20	1.24 (0.08)	1.24 (0.08)	1.21 (0.08)
>0.20	2.34 (0.09)	2.34 (0.09)	2.31 (0.09)
Has Tests (z^{test})			0.07 (0.07)
Cost Sharing ($z^{\text{cost-sharing}}$)	-0.17 (0.10)	-0.17 (0.10)	-0.23 (0.12)
In Total MW in the Queue			0.03 (0.03)
<10km			-0.01 (0.07)
<100km			-0.02 (0.03)
Same TO	-0.03 (0.02)	-0.03 (0.02)	-0.02 (0.03)
PJM			0.08 (0.13)
Withdrawn in the Past 2 Quarters, <100km	0.02 (0.01)	0.02 (0.01)	0.01 (0.01)
Withdrawn in the Past 2 Quarters, Same TO			0.00 (0.02)
Generator i Waiting for Third Study \times			0.01 (0.01)
In Total MW in the Queue			-0.02 (0.02)
PJM			-0.00 (0.02)
Withdrawn in the Past 2 Quarters, <100km	-0.02 (0.01)	-0.02 (0.01)	-0.02 (0.02)
Withdrawn in the Past 2 Quarters, Same TO			-0.00 (0.02)
Wind/Solar	0.45 (0.09)	0.45 (0.09)	0.33 (0.18)
Wind/Solar \times Entry Year			0.42 (0.32)
>2013-2015			0.59 (0.41)
>2016-2018			0.08 (0.46)
>2018	-0.48 (0.20)	-0.48 (0.20)	
Wind/Solar \times Year			-0.03 (0.30)
>2013-2015			-0.43 (0.42)
>2016-2018			-0.28 (0.49)
>2018	0.09 (0.19)	0.09 (0.19)	
Capacity (MW)			-0.08 (0.09)
10-20			-0.01 (0.10)
20-100			-0.51 (0.24)
100-500			-0.46 (0.27)
>500			
Capacity >100 \times Entry Year			0.89 (0.32)
>2013-2015	0.02 (0.15)	0.02 (0.15)	0.93 (0.43)
>2016-2018	-0.13 (0.12)	-0.13 (0.12)	1.22 (0.47)
>2018	0.14 (0.09)	0.14 (0.09)	
Capacity >100 \times Year			-0.26 (0.32)
>2013-2015			-0.44 (0.44)
>2016-2018			-0.55 (0.50)
>2018			

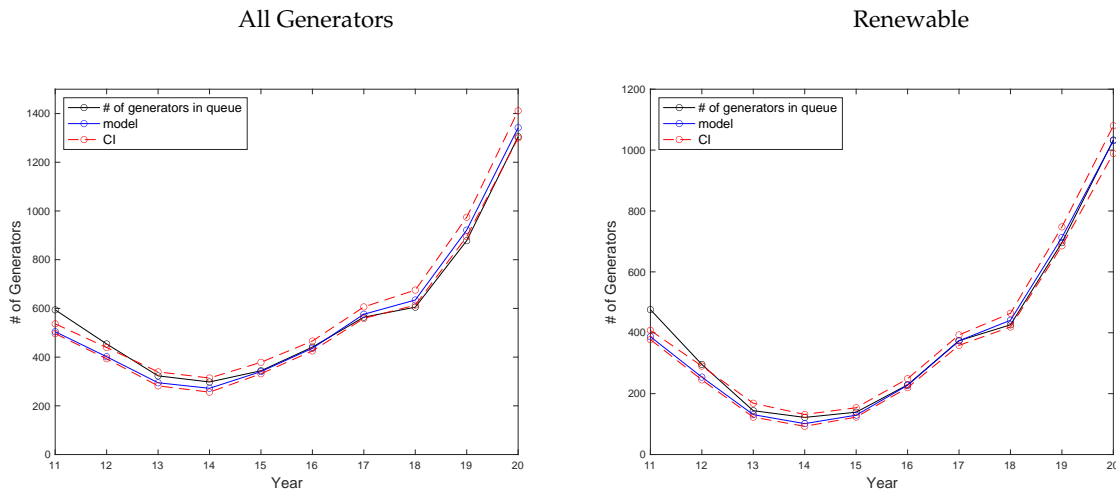
We additionally include entry year and year fixed effects at a 3-year level, state fixed effects, number of quarters in the queue fixed effects up to 2 years and interactions with whether the generator is waiting for the third study, indicators for whether the generator is an uprate, waiting for its third study, study 1 indicates the generator might later share costs with others, any upgrade was completed during the same substation, the most recent interconnection at the same substation, and any RTEP was completed at the same substation. The ordered probit cutoffs are $[0, \hat{\mu}_2 = 0.93, \hat{\mu}_3 = 1.24]$, with (μ_2, μ_3) 's standard errors at (0.04, 0.08) in the baseline.

Table E.14: Standard Deviation Estimates for Unobservables (\$1,000/MW)

ζ_t	Year			
	<2013	2013-2015	2016-2018	>2018
Renewable				
Waiting Time ≤ 2 Years	877.03 (120.45)	240.11 (86.62)	381.58 (56.52)	471.48 (40.67)
Waiting Time > 2 Years	1294.16 (211.91)	342.51 (73.18)	613.45 (79.83)	546.47 (40.36)
Non-Renewable				
Waiting Time ≤ 2 Years	666.73 (152.71)	320.08 (52.92)	342.46 (47.10)	247.62 (36.46)
Waiting Time > 2 Years	354.98 (340.11)	324.09 (79.61)	227.92 (74.43)	95.21 (28.36)
ε_t	78.77 (4.80)			

Estimates of the standard deviations of the unobservables. SEs in parentheses.

Figure E.4: Number of Generators Waiting in Queue 2011-2020, Model and Data



For year $t = 2011, \dots, 2020$, the solid black lines (number of generators waiting in queue) at t represents the number of generators that entered the queue in or after 2008 and had not withdrawn by t . The blue line is the simulated prediction. The red line represents the confidence intervals for the model prediction.