



## **PJM eTariff Filing Protocol for PJM Transmission Owners**

### **Background:**

At the request of the PJM Transmission Owners (“TOs”) and pursuant to Section 7.3.2 of the Consolidated Transmission Owners Agreement (“TOA”) and Section 9.1(b) of the PJM Open Access Transmission Tariff (“PJM Tariff”), PJM, as the administrator of the PJM Tariff, has agreed to submit on behalf of the TOs, the PJM Tariff, TOA and Service Agreement/PJM rate schedule filings (together referred to as “Tariff” or “Tariff filings”) for which the TOs have exclusive FPA Section 205 filing rights. The effective date of this Protocol will coincide with the effective date of PJM’s electronic baseline filing in compliance with Order No. 714 Order 714 (124 FERC ¶ 61,270) issued September 19, 2008 Order 714 (124 FERC ¶ 61,270).

In order to help ensure that PJM has adequate time and resources available to administratively file Tariff revisions on behalf of the TOs using PJM’s vendor eTariff software, the following protocol is needed:

### **Initial Notice of Anticipated Filing and Request for Current Tariff Sheets**

- The TOs will notify PJM of a Tariff filing and request the Word version of the current Attachment H and/or other sections in the PJM Tariff preferably three (3) weeks, but no later than two (2) weeks, prior to anticipated filing date.
- PJM Staff will provide a Word version of the PJM Tariff documents to the TO within three (3) business days of the notice.
- Emails are to be sent to [eTariff@pjm.com](mailto:eTariff@pjm.com) which includes the following PJM personnel: Steve Pincus ([pincus@pjm.com](mailto:pincus@pjm.com)) and Karen Lewis ([lewisk@pjm.com](mailto:lewisk@pjm.com)). Sheneen Wilson ([wilsos@pjm.com](mailto:wilsos@pjm.com)) is also assisting with the filing of Agreements such as WMPAs, ISAs, CSAs, etc.
- PJM Legal Daytime Phone Numbers to provide information: Steve Pincus at 610-666-4370 or Karen Lewis at 610-666-8252. Emergency after hour requests should be made by calling Steve Pincus at 610-496-4753.

### **Confirmation of Anticipated Filing Date**

- The TO will confirm by e-mail to [eTariff@pjm.com](mailto:eTariff@pjm.com) that the filing will take place and provide the date of such filing at least three (3) business days prior to the filing date. The TOs shall promptly notify PJM of any schedule changes to the filing date.
- PJM will advise the filing TO of any issues with the proposed filing date such as holidays, volume of anticipated filings that particular day, etc., and coordinate a mutually acceptable resolution of such issues to ensure TO filing deadlines are met.



## **Preparation Time Required by PJM**

- **TO Review of Complete Filing:** No later than 12:00 PM the filing date or such time as requested by PJM, the TO will submit to PJM eTariff staff the final TO Tariff filing (transmittal letter and all attachments including, but not limited to, clean and redline Tariff sections to PJM. PJM will not make **any** changes to the TO filings including the transmittal letters. PJM will only be responsible for uploading the filing into the eTariff software and convert the filing into the required FERC XML format or filing via the eTariff portal. A complete PDF of the entire filing may be provided to the TO for review prior to the filing provided time has been built in to the filing for this review.
- **Receipt of Complete Filing Package:** The complete filing package is to be received by PJM by 12:00 PM the day of the filing in order to provide PJM's staff with adequate time to prepare the filing for conversion and upload into the required filing format and submit the filing to FERC in a timely manner. The 12:00 PM deadline will also offer PJM and the TOs additional time needed to confirm FERC has received the filing in proper format and time for the TOs to work with PJM should FERC not accept the TO's filing for any reason.
- **eTariff Preparation Time and Notification:** PJM software requires a few hours to upload, test and confirm the TO's FERC filing on the web site by the close of business on the date of filing. Preparation time takes into account the time necessary to upload the filing document into the eTariff software, convert the filing to the required XML format, to create the Zip file and to electronically file the document with the Commission via the eTariff portal and receive confirmation of the filing and confirmation that there are no errors in the submission.
- **Notification that filing is accepted:** FERC will send three email notifications. The first email notification advises the XML has been received in the FERC eTariff portal. The second email notification advises whether the XML is readable and identifies whether there are any error codes. It is important to note that if there is an error in the XML and a correction must be made, the filing time may be past and the deadline may be missed or the date requested may then be incorrect on the tariff sheets. The third email notification advises the filing has been accepted and provides the docket number. Both PJM and the TO will receive this e-mail notification.
- **Receipt of Filing timely for Service :** A 12:00 PM receipt of the filing by PJM on the date of the filing allows PJM the opportunity to upload the filing on PJM's website. Receipt after 3 p.m. may not permit a timely upload and the PJM web site service link utilized in providing service of the filing may not be available until the next morning. Thus, PJM cannot guarantee posting and service to the PJM Members and Commissions nor will the TOs be able to provide service upon the FERC service list for filings with an existing docket until the following morning if filing documents are received after 3 p.m.



- **Process for Resolving Filing Errors:** If there is an error in uploading the XML package to the eTariff site, both PJM and the TO will have prompt notification of the error by e-mail. If there are any errors with and the Commission is unable to “read the XML Schema” in the filing, PJM and the TOs will work cooperatively to correct and re-file the document on the same date if possible.
- **Missed Filing Deadline:** Missing a filing deadline will be addressed on a case-by-case basis. PJM anticipates that late filings to meet a FERC-imposed deadline may require the submission of a request for waiver by the TO and, if the delay was caused by administrative or technical problems, PJM will provide supporting information for such waiver request. However, PJM’s liability in any case will be limited by the applicable limitation of liability and indemnity provisions of the PJM Tariff and Operating Agreement.
- **Short Notice Filings:** PJM Staff will make every effort to accommodate short filing needs subject to the limitations described above.

### **TO Transmittal of Complete FERC Filing**

- **Transmittal Letter:** The Transmission Owner is responsible for the preparation of the filing transmittal letter. The transmittal letter will be forwarded to PJM in either Word format or PDF format. The TO will ensure the letter has been scrubbed to remove metadata and track changes.
- **Transmittal Letter Footnote Requested:** PJM requests that the Transmission Owner include a footnote with the following information in the transmittal letter pertaining to the Service Agreements or the Intra-PJM Tariff. The reason this language is needed is because of limitation in the FERC eTariff software which requires these filings to name PJM as the “Applicant” and the TO as the “Additional Applicant”. This footnote is intended to help clarify the actual roles of the parties when PJM is filing TO Section 205 Tariff revisions as the Administrator of the PJM Tariff:

**1. Filings related to Service Agreements -** Pursuant to Order No. 714, this filing is submitted by PJM Interconnection, L.L.C. (“PJM”) on behalf of [COMPANY NAME] as part of an XML filing package that conforms with the Commission’s regulations. PJM has agreed to make all filing son behalf of the PJM Transmission Owners in order to retain administrative control over the PJM Tariff. Thus, [COMPANY NAME] has requested PJM submit this [AGREEMENT] in the eTariff system as part of PJM’s electronic Service Agreements Tariff.

**2. Filing related to the Intra-PJM Tariff -** Pursuant to Order No. 714, this filing is submitted by PJM Interconnection, L.L.C. (“PJM”) on behalf of [COMPANY NAME] as part of an XML filing package that conforms with the Commission’s regulations. PJM has agreed to make all filing son behalf of the



PJM Transmission Owners in order to retain administrative control over the PJM Tariff. Thus, [COMPANY NAME] has requested PJM submit this [TARIFF REVISION] in the eTariff system as part of PJM's electronic Intra PJM Tariff.

- **Transmittal Letter - Service Language:** PJM requests that the Transmission Owner include the following service paragraph in the transmittal letter when submitting filings that require service to the PJM Members, PJM States and FERC Service Lists in order to ensure compliance with Order No. 714 and the FERC's regulations governing service and to avoid technical and logistical complications. The reason for this request is that although PJM strives to complete the posting of the filings in time for the link to the document on the PJM website to be live when eService is effectuated, it is possible the link will not be deployed in time to be live before 5:15 p.m. on the filing date. In order to ensure compliance with the FERC's eService rules, PJM is also providing a link to the FERC's eLibrary website which is allowed by Order No. 714. The use of the PJM website links for service goes beyond the FERC's requirements.

PJM has served a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by posting this filing electronically. In accordance with the Commission's regulations,<sup>[1]</sup> PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <http://www.pjm.com/documents/ferc-manuals/ferc-filings.aspx> with a specific link to the newly-filed document, and will send an e-mail on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region<sup>[2]</sup> alerting them that this filing has been made by PJM and is available by following such link. PJM also serves the parties listed on the Commission's official service list for this docket. If the document is not immediately available by using the referenced link, the document will be available through the referenced link within 24 hours of the filing. Also, a copy of this filing will be available on the Commission's eLibrary website located at the following link: <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.

<sup>[1]</sup> See 18C.F.R §§ 35.2(e) and 385.2010(f)(3).

<sup>[2]</sup> PJM already maintains, updates and regularly uses e-mail lists for all PJM members and affected state commissions.

- **Redline Sections aka "marked tariff":** The Transmission Owner will produce the redline sections aka marked tariff for any Attachment Hs and/or other sections of the PJM Tariff in Word format. FERC will only accept Word format for these sections which are uploaded in the database and then converted to the format RTF. The TO will also ensure the sections have been scrubbed to remove the metadata and track changes.
- **Clean Sections:** PJM's eTariff software will accept the redline sections aka "marked tariff" (according to FERC's new terminology) and generate the "marked tariff" into the "clean tariff". PJM's staff will then convert the convert the Word versions of the marked

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tariff and clean tariff into a PDF format prior to uploading as attachments to the FERC website.

### **Important Formats:**

- **Attachment Format and Size:** An attachment consists of supporting exhibits and attachments to a filing that are not tariff sections. FERC's size limit for attachments is 50 MB and may be provided in either .pdf or ".doc" extension. FERC does not accept ".docx".
- **Section Format and Size:** A section is the actual "tariff" language being filed. FERC uses the term "tariff" generically for any Tariff, Operating Agreement, Service Agreement, etc., that is being filed in eTariff. The sections being uploaded into the eTariff system must be in Microsoft Word format. The sections may not be larger than 10 MB per section. If a section is larger than 10 MB, the sections must be broken out into separate sections which FERC refers to as "child sections". The general explanation of sections is that when a section is filed in eTariff it is entered with a unique Record ID. When the sections are broken down, the sections become a Parent Record and a Child Record which is similar to a Level 1 and Level 2 in Microsoft Word. Sections may be filed as Parent/Child Records.
- **Section Format Requirements:** Per Order No. 714 and the FERC Technical Conference held on January 21, 2011, FERC clarified the Word sections being submitted in eTariff are to be submitted in simple styles as follows:
  - o No headers, footers or footnotes
  - o No complicated formatting such as automatic generated styles including Table of Contents or Outlines
  - o No automatic numbering formats
  - o No text boxes
- **New Service Agreements:** New service agreements (e.g. wires-to-wires interconnection agreements, etc.) must be submitted in Word format. The actual signature pages may be attached to the filing as an attachment in a scanned PDF format and an electronic signature may be added to the signature page in the agreement.
- **Naming Convention:** The naming convention for the TO's filings should include their company name (abbreviated) and the filing date (e.g., 20100707-ACEC Formula Rate Update.doc).
- **Transmittal Form to PJM:** PJM has developed a transmittal form to be used when requesting PJM to send the filing to FERC. This form will include the company name as on file with FERC, company contact information, etc. The form is attached to this protocol.



- **Timeline:** The Transmission Owner is to forward the final filing package to PJM in the necessary requirements of Word and/or PDF as identified above no later than 12:00 PM on the day the filing is to be made.

### **TO Documents for Posting to PJM Web Site**

PJM will post the completed filing package to the PJM Website:

1. Transmittal Letter and all Attachments in; and
2. The formula rate filings along with the Attachment H as "stand alone" documents in Word format for posting to the Formula Rate section of the PJM web site.

PJM will post a TO's Notice of any Formula Rate Annual Update Meetings being held by the TO concerning the Formula Rates being filed with the Commission.

### **TO Documents for Service to the FERC Service List, PJM Members and State Commissions:**

Once the TO filing has been posted to the PJM Website, PJM will send a link to the transmission owner and service will be effected as follows:

1. The TO will service the parties listed in the FERC service list for existing dockets with an established service list; and
2. PJM staff will serve the PJM Members and State Commissions, which is the current practice and will be continued under the eTariff process.

### **TO Transmittal of FERC Order Approving Formula Rate Filing**

- TO and PJM will each receive the notifications of FERC receipt of the filing, the SOC acceptance of the filing and the Commission order issuance.
- PJM will upload the Commission Order and other notifications into the eTariff software, which will be a complete record of the filing, and will store in the eTariff software as a permanent record of the Tariff document filing.

The Transmission Owner will provide PJM with a brief narrative summarizing the changes for use by H. Dessender and the Market Settlements group:

- Show what revenues/rate are to be collected for NITS, what are the settlement impacts, and the timing, etc.;
- Show what revenue/rate are to be collected for Schedule 12 projects; and



- Any new default supplier percentages for the allocation of certain billing line items pertaining to BGS/SOS/ CPP and other default supplier contracts.

### **Versioning of the PJM Tariff Documents**

- PJM is required by FERC to section its tariff documents to the “1.1” section level. At this point, PJM plans to keep the Attachments H – Annual Transmission Rates as individual sections of the Tariff. Review of the sectioning will be made to determine if the entire Attachment H section falls within the FERC MB requirements. If the entire attachment falls within these parameters, then PJM will be able to keep the attachment as one section. If an Attachment H is divided into sections (e.g., Attachment H-3, Attachment H-3A, Attachment H-3B, etc.), these will be separate sections of the Tariff as is currently shown in the current Table of Contents.
- Filing of an update to an Attachment H is normally performed as a re-filing in the entirety of the entire section for update purposes.
- Pursuant to FERC Order No. 714, PJM will no longer be using Order No. 614 formatting for the Tariff pages. Each section of the PJM Tariff documents will have a section and can be identified by its numeric value. The section metadata will indicate where this particular section resides in the Tariff document. In addition, there will be page footers indicate the Tariff version, the issue date of the filing, the requested effective date and other pertinent information for each page of the printed document as well as a table of contents printed for the entire tariff document as needed.

### **Service Agreement Filings**

The filing of Service Agreements will be subject to the same procedures as tariff filings. PJM eTariff staff will provide the Service Agreement numbers. However, there may be some differences between the regular Tariff filings and the service agreement filings due to timing constraints (e.g., agreements that must be filed within 30 days after signing) or other tariff regulations. Some examples of agreements to be filed by PJM using the eTariff software are Interconnection Service Agreements (ISAs), Construction Service Agreements (CSAs), Wholesale Market Participation Agreements (WMPAs), or Wires-to-Wires Agreements.<sup>1</sup>

PJM eTariff staff will need to know when TOs are filing amendments to existing service agreements as the filing will now be performed under the eTariff provisions.

The cancellation of an existing service agreement filed prior to e-Tariff are to be cancelled by the Transmission Owner through e-File.

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<sup>1</sup> The agreements noted here are only a few of the possible agreements to be filed via eTariff.



**PJM Transmission Owner  
eTariff Transmittal Form**

Please provide the following information with the filing:

1. Company names as approved by the Commission:

\_\_\_\_\_

2. The emails for the attorney submitting the filing and ensure the attorney has been registered in eTariff (independently of eFiling).
3. Short title of filing with maximum of 70 characters or PJM will create a short title from the Filing Summary.
4. Filing date: \_\_\_\_\_
5. Requested effective date: \_\_\_\_\_
6. Filing Codes: A full list of the filing codes is available on the FERC Website. A few of the most common codes are:
  - Code 10 - Rate Schedule Change other than Rate Increase/Compliance filing = initial Section 205 tariff revisions filing
  - Code 80 – Compliance Filing
  - Code 130 – Amendment of Pending Tariff Filing (when filing with sections)
  - Code 150 - Data Response/Supplement the Record (if no sections are being filed)
7. Transmittal letter, all sections for the filing, cover pages and additional attachments necessary.
8. Filing summary for use in posting filing to the PJM website and serving the PJM Members and States when applicable. Should be two or three sentences.

PJM will provide the required metadata as listed below with the filing:

- Company ID
- Tariff Title and Tariff ID
- Filing Title – Will appear in eLibrary and LegalEase. PJM will create a short title from the Filing Summary for posting to PJM.com
- Filing ID
- Parent Record ID
- Child Record ID
- Collation Value



## CONVERSION PROCESS

### **Instructions for minimizing the size of maps, diagrams, charts and graphs to meet FERC's criteria for filing in ETariff and converting to rich text format (RTF).**

FERC will only accept sections uploaded in the ETariff system that are less than 10MB. FERC has requirements with regard to the ETariff system which require re-sizing of maps, diagrams, charts and graphs. When these items are converted into rich text format ("RTF") they enlarge dramatically not allowing them to upload properly into the FERC ETariff System causing either redacted sections or sections that appear entirely blank. The instructions below are a guideline to assist in compressing the maps, etc., from options provided within Microsoft Word. Please note, this is only one option and there are many others you may prefer to use.

### **Document Preparation**

The first step is to review the document to ensure the document is a ".doc" extension. FERC accepts Microsoft Word with the ".doc" extension for uploading into the E-Tariff system. The smaller the size the better the chance FERC will accept the map, diagram, chart or graph.

The second step is to review the size of MB or KB of the document that contains the picture.

The screenshot shows a Windows Explorer window with the address bar set to 'ETariff Technology'. The file list contains one entry: 'Planning picture only.doc', which is highlighted in yellow. The file's size is listed as 162 KB. The table below represents the data shown in the screenshot.

Name	Date modified	Type	Size	Tags
Planning picture only.doc	12/6/2010 12:07 PM	Microsoft Office ...	162 KB	

## Conversion Steps

Step 1: Right click into the picture you are re-sizing.

Step 2: Chose the option "Format Picture". This step will not allow me to show a snip-it.

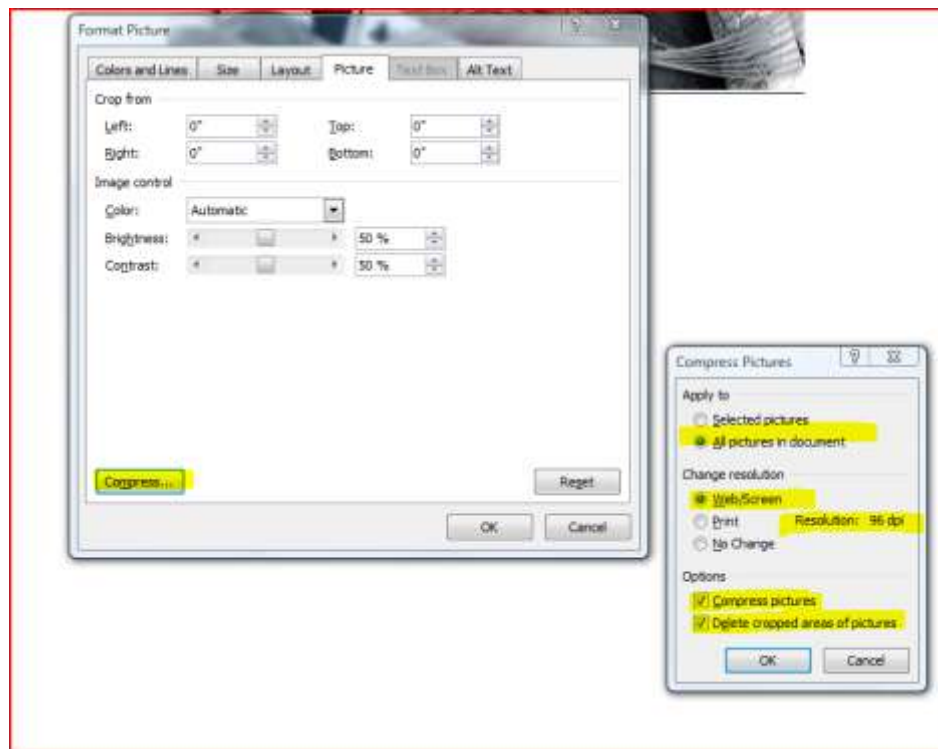
Step 3: Format Picture Options will now be showing in your view.

Step 4: Under Format Picture Options, choose Compress in the bottom left corner.

Step 5: Compress Picture Options will now pop up with more options.

Step 6: Select:

- a) All pictures in the document
- b) Web/Screen which will change the resolution from approximately "200 dpi" to "96 dpi" as an example.
- c) Compress Pictures and
- d) Delete Cropped areas of pictures
- e) Click on OK to save



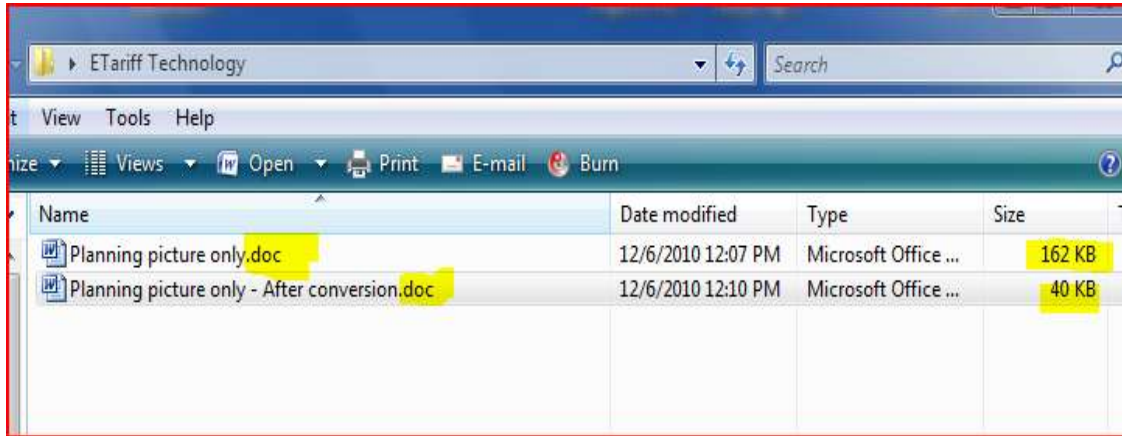


## Compare the Document Size from Prior to and After the Conversion

The last step is to compare the document size from the prior version to the converted document to ensure the size is small enough for FERC to accept. A sample of the size comparison after conversion is below.

Size of document before conversion = 162KB

Size of document after conversion = 40KB



The screenshot shows a Windows Explorer window titled "ETariff Technology" with a search bar. The file list contains two entries:

Name	Date modified	Type	Size
Planning picture only.doc	12/6/2010 12:07 PM	Microsoft Office ...	162 KB
Planning picture only - After conversion.doc	12/6/2010 12:10 PM	Microsoft Office ...	40 KB

If there is any doubt with the size of your document not converting smaller than the 10MB limit FERC imposes, please save in RTF format to confirm the size of the RTF.

If there are problems with converting the diagram, FERC's suggests using ".gifs" versus ".jpegs" to convert if possible for maps, diagrams, etc., for any images being filed. For additional FERC guidance, please review the FERC Implementation Guide or the FERC Discussion Questions at the following two links:

<http://www.ferc.gov/docs-filing/etariff/implementation-guide.pdf>

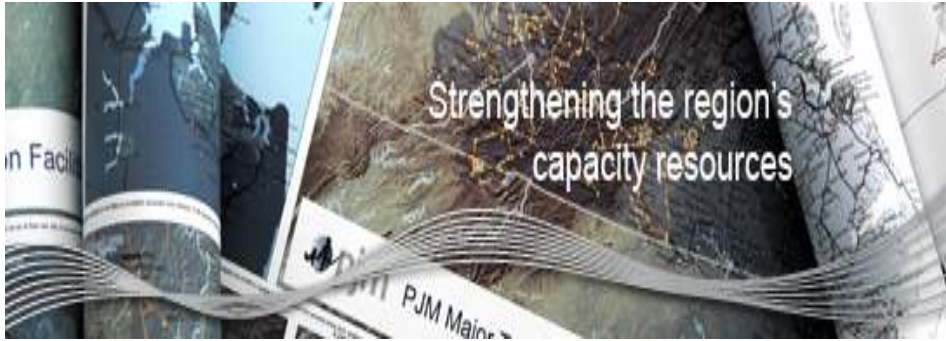
<http://www.ferc.gov/docs-filing/etariff/responses-discussion-questions.pdf>

Because the RTF file size can vary significantly, and depends on the version of Microsoft Word being used, you should look at file sizes for both the .doc and the .rtf when checking if it is too large. The .doc and the .rtf **combined** should be well under 10 MB, to allow for overhead associated with the XML format required by FERC.

## Resolution Comparison

This conversion will change the resolution of the map, but will continue to be legible. I am using a photograph taken from PJM.com's Planning Page. Below is a comparison for your review of the picture before and after conversion.

Planning picture before conversion.



Planning picture after conversion.

