Interconnection Security Requirements Revisions

Issue Source

Dominion Energy

Issue Content

The proposed tariff revisions are intended to address a very specific, limited issue impacting vertically integrated utilities that develop generation in the same transmission zone in which they serve as the transmission owner in PJM. FERC opined that Transmission Providers should change their *pro forma* interconnection agreements to eliminate the requirement to post security for interconnection projects in the limited circumstance in which the exact same corporate entity is a project developer and transmission owner of the interconnection project if the "situation arises frequently" so they don't have to file non-conforming agreements and waiver requests.[1]

Key Work Activities and Scope

The only work activity the assigned stakeholder group will need to perform to accomplish its work in resolving the issue is proposing revisions to the PJM Open Access Transmission Tariff ("Tariff") for Member consideration. The Tariff revisions are limited to situations in which the same exact corporate entity is both the Project Developer and the Transmission Owner of a Project for which a Generator Interconnection Agreement or Construction Service Agreement or other interconnection agreement is required, and for any related Network Upgrade Cost Responsibility Agreement.

Expected Deliverables

The deliverable that the assigned stakeholder group will produce as a result of its work is governing document revisions, and a FERC filing will need to be submitted.

Decision-Making Method

Quick Fix

Stakeholder Group Assignment

This issue can be reviewed by MRC.

Expected Duration of Work Timeline

This issue can be completed in the stakeholder process in three months or less given the very limited applicability of the issue and existing FERC precedent supporting the proposed changes.

Start Date	Priority Level	Timing	Meeting Frequency
10/1/2026	☐ High	☒ Immediate	☐ Weekly
	☒ Medium	☐ Near Term	☒ Monthly
	☐ Low	☐ Far Term	☐ Quarterly

[1] *MidAmerican Energy Co.*, 116 FERC ¶ 61,018 at P 11 (2006); *Pacific Gas and Elec. Co.,* 128 FERC ⁋ 61,175, at P 20 (2009).

Charter

(check one box)

☐	This document will serve as the Charter for a new group created by its approval.
☒	This work will be handled in an existing group with its own Charter (and applicable amendments).