ORDER No. 845
Status Update

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Planning Committee

• PJM sought independent entity variation in two areas:
  – Utilization of Surplus Interconnection Service – PJM requested to use its existing single integrated queue process; and
  – Interconnection Study Metrics Reporting – PJM requested to report its study metrics on a six month basis consist with its queue cycle
Option to Build – PJM proposed to adopt *pro forma* provisions omitted from its Order No. 2003 compliance filing:

- PJM narrowed the applicability of option to build to Transmission Owner Attachment Facilities and Direct Connection Network Upgrades consistent with FERC’s definition of stand alone network upgrades;
- PJM proposed to incorporate safeguards provided for in *pro forma* LGIA, article 5.2, as a new section 3.2.3.2(a); and
- PJM proposed to require Interconnection Customer to request to exercise Option to Build within 30 days from receipt of a final study.
Dispute Resolution. PJM used its current non-binding dispute resolution process in section 12.1 (with revisions) and added a new section 40 in compliance with Order No. 845.

Contingent Facilities. PJM added the pro forma definition of Contingent Facilities and a new section 205.2.1 that explains the methodology used by PJM to identify Contingent Facilities.

Transparency Regarding Study Models and Assumptions. PJM mostly complied with Order No. 845 but proposed to revise section 36.1.7.
Definition of Generating Facility.  PJM’s Tariff does not include the pro forma definition of Generating Facility.  PJM proposed to add the definition with the reference to storage to comply with the Final Rule.

Interconnection Service Below Generating Facility Capability.  PJM proposed to add new section 36.1.1A to explicitly provide that PJM shall (i) consider requests for service below a generating facility’s full electrical capability; and (ii) study such requests at the level requested but may study such facility at its full generating capability for safety and reliability.
Provisional Interconnection Service. PJM proposed to include the *pro forma* definition of Provisional Interconnection Service but replaced the reference to a Provisional Large Generator Interconnection Agreement with a PJM Interconnection Service Agreement.

Advanced Technologies. PJM proposed to add a new definition of permissible technological advancements and a new section 36.2A.1.3 to clarify how PJM will apply a permissible technological advancement request in the context of the interconnection process.
Comments and Protests

- PJM received two sets of comments and three sets of protests to its filing.
  - Most comments were supportive of PJM’s revisions to comply with Order No. 845
  - Challenges to the requested effective date of “no earlier than the interconnection queue commencing April 1, 2020:
    - To allow the proposed revisions to coincide with the beginning of a new interconnection queue;
    - It would be difficult to implement the many revisions given the lead time necessary to integrate process changes that affect markets, operations and planning procedures, including modifying four separate software applications and an existing data base to accommodate surplus interconnection service.
• Option to Build.
  – PJM Generation Developers protested PJM’s proposal to exercise the timing to exercise Option to Build; and
  – AEPSC pointed out that as a result of the revisions proposed in the compliance filing, a discrepancy was created, which stemmed from the underlying Complaint filed in Docket No. ER19-18. To address that discrepancy, PJM proposed that FERC direct PJM to delete the revisions in a compliance filing.
  – Other protests to the compliance filing were addressed by PJM in its answer filed on July 11, 2019 in the docket.
Next Steps

- PJM is awaiting a FERC Order on its Compliance Filing
- Manual changes will need to be drafted upon receipt of the FERC Order