

# **PJM eTariff Filing Protocol for PJM Transmission Owners (“TO Protocol”)**

## **I. BACKGROUND**

At the request of the PJM Transmission Owners (“TOs”) and pursuant to Article 7.3.2 of the Consolidated Transmission Owners Agreement (“CTOA”) 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, through PJM’s eTariff system, the PJM Tariff, CTOA, Reliability Assurance Agreement and Service Agreement/PJM Rate Schedule filings (together referred to as a “Tariff filings,” “Tariff revisions” or “Tariff section(s)”) for which the TOs have exclusive FPA Section 205 filing rights. This protocol was adopted to 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.

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 must be followed:

## **II. PROCEDURE**

### **A. Initial Notice of Anticipated Tariff Filing and Request For Current Tariff Sheets**

- The TOs shall notify PJM, by email to [etariff@pjm.com](mailto:etariff@pjm.com) of an anticipated Tariff filing preferably three (3) weeks prior to, but no later than two (2) weeks prior to the anticipated filing date. The notice must contain an anticipated filing date and a request for the current Word version of the Tariff sections to be revised/modified/or altered in Tariff filing, if applicable (does not apply to “new” Service Agreements or tariff sections). For a new Service Agreement(s), the notice must contain a request for a Service Agreements Number(s).
- Once initial notice has been submitted to PJM, a PJM Legal Staff member will, within three (3) days of the notice, provide a Word version of the requested Tariff section(s) for Tariff filings. For Service Agreement filings, the Service Agreement Number(s) will be provided.
- Failure to provide proper notice of an anticipated filing date to PJM Legal Staff in a timely manner may result in PJM not being able to guarantee the filing can be made on the requested date.
- For any questions or concerns, please contact: Pauline Foley at 610-666-8248 or [Pauline.Foley@pjm.com](mailto:Pauline.Foley@pjm.com).

### **B. Initial Notice of Anticipated Tie Line/Border Agreement Filing**

- The TOs shall notify PJM by making the proper submission at <https://pjm.com/about-pjm/member-services/tie-lines.aspx> of an anticipated tie line or border service agreement filing preferably three (3) weeks prior to, but no later than two (2) weeks prior to the anticipated

filing date. The notice must contain an anticipated filing date and a request for the service agreement to be reviewed. For a new Service Agreement(s), the notice must contain a request for a Service Agreement Number(s). For existing Service Agreements, a redline and clean copy must be attached. Requests for expedited treatment must also be made clear in the comments section of the submittal.

- Once initial notice has been submitted to PJM through <https://pjm.com/about-pjm/member-services/tie-lines.aspx>, a PJM Legal Staff member will begin the PJM internal review process, and, within two weeks, will get back to the TO with requested changes or to request a fully executed agreement for PJM to acknowledge. For Service Agreement filings, if the service agreement is new, the Service Agreement Number will be provided by PJM.
- Failure to provide proper notice of an anticipated service agreement filing date to PJM Legal Staff in a timely manner may result in PJM not being able to guarantee the filing can be made on the requested date.
- For any questions or concerns, please contact: Barbie Zankpah at 610-666-8272 or [Barbie.Zankpah@pjm.com](mailto:Barbie.Zankpah@pjm.com) or Jeanine S. Watson at 610-666-4438 or [Jeanine.Watson@pjm.com](mailto:Jeanine.Watson@pjm.com).
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**C. Confirmation to PJM of Anticipated Filing Date and PJM Review of Draft Filing Package in Conformance with This Protocol and Order 714 Requirements**

- **TO Confirmation to PJM of Filing Date**

At least three (3) business days prior to the anticipated filing date provided in the TO's notice, by email, shall (i) notify PJM of any changes in the anticipated filing date, or (ii) confirm the anticipated filing date and provide:

- A completed TO eTariff Transmittal Form (see "PJM Transmission Owner e-tariff Transmittal Form" attached to this protocol); and
- A copy of the final filing package that conforms to the guidelines (see **Guidelines for Conforming with TO Protocol and Order 714 Requirements ("Guidelines") section of this protocol**).
- For Wires-to Wires / Tie-line service agreement filings, the TO shall email filing package to the PJM Legal Service Agreement Team at [LSAT.TieLineGroup@pjm.com](mailto:LSAT.TieLineGroup@pjm.com)

- **PJM Legal Staff's Confirmation and Review of the Filing Package**

PJM Legal Staff, by email, shall confirm and advise the TO of any issues with the requested filing date (including, but not limited to holidays, volume of anticipated filings that particular day, etc.); and coordinate with the TO a mutually acceptable filing date; and respond with any required changes to be made to the filing in order to conform to the Guidelines. The TO is responsible for making the requested revisions and sending

updated documents with the requested revisions in a timely manner in order to give PJM Legal Staff time to prepare the final filing package.

#### **D. PJM Review of the Final Filing Package**

Upon completion by the TO of all required revisions, a PDF of the entire filing will be provided to the TO for final review. The TO must provide PJM e-Tariff staff with the final approval of the TO Tariff filing by no later than 12:00 PM on the filing date, or such time as requested by PJM. PJM will not make any changes to the TO filings, including the transmittal letters, unless the PJM Attorney providing final approval requests a change. Once the change is approved by both the filing TO and the PJM Attorney the filing will be submitted.

#### **E. Process for Resolving Filing Errors**

If there is an error in uploading the XML package to the FERC e-filing site, both PJM and the TO will have prompt notification of the error by e-mail and PJM will take the first attempt at working to correct and re-file the document on the same date, if possible. If PJM is unable to fix or correct the error, PJM will work with the TO to correct any errors that are occurring.

- **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 (include filings without at least two-weeks' notice and those submitted less than three business days from the requested filing date):** PJM Staff will make an effort to accommodate Short Notice Filing needs, if possible, based on limitations such as PJM filing volume, Legal Staff workload, etc. Short Notice Filings should not be a frequent occurrence.

#### **F. Notification of TO Filing Acceptance**

FERC will send three (3) email notifications on the submitted filing. The first email notification advises that 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 (see section on Process for Resolving Filing Errors), the filing time may have passed and the deadline may be missed. Therefore, it is important to comply with the Guideline Requirements. The third email notification advises that the filing has been accepted and provides the assigned docket number. Both PJM and the TO will receive the third e-mail notification.

#### **G. PJM Notification to TO of Accepted Filing with the Final Filing Package**

After the filing has been accepted, PJM will send an email to the TO which will include a PDF of the filing that was made.

### **III. GUIDELINES FOR TO DRAFT FILING PACKAGES (FOR BOTH TARIFF AND TIE LINE/BORDER SERVICE AGREEMENT FILINGS) AND CONFORMANCE WITH ORDER 714 REQUIREMENTS**

PJM will review the draft filing packages to ensure they are prepared in accordance with the Electronic Tariff Filings Order 714 requirements and this section of the TO Protocol. PJM will notify the TO of any revisions necessary to documents produced by the TO.

#### **A. Transmittal Letter**

The TO must forward their transmittal letter with the contents required below in Word or PDF format and will ensure that the transmittal letter has been scrubbed to remove any metadata and track changes.

**1. Footnote:** PJM requests that the TO include from below, the appropriate footnote in their transmittal letter because of limitations of the FERC e-Tariff software that only allows, within the eTariff system, PJM to be the “Applicant” and the TO to be 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. (For purposes of the body of the transmittal letter/overall responsibility for the filing itself, the TO is still the “Applicant.”)

- **Service Agreement Filings** - 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 filings on 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 e-Tariff system as part of PJM’s electronic Service Agreements Tariff.
- **PJM Tariff (Attachment H, etc.) Filings**- 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 filings on 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.

**2. Service Language:** PJM requests that the TO include from below the appropriate service paragraph in their transmittal letter to ensure compliance with Order No. 714 and the FERC’s regulations governing service. **(Please note that the TO is responsible for service of the filing on any parties on the official FERC Service List.)**

- **Service Agreement Filings** – The TO is responsible for including language to the effect that the TO has served all parties as may be required by FERC.
- **PJM Tariff (Attachment H, etc.) Filings:** Please note that the TO is responsible for service of the filing on any parties on the official FERC Service List For Tariff filings, please include the paragraph and associated footnotes below in your transmittal letter.

“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. 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.

## **B. Tariff Record (Tariff Sections and Service Agreements) Requirements, Order 714 Requirements & PJM Requirements for Submission**

### **1. Requirements for Revised Tariff Sections/Service Agreements and New Tariff Sections requirements are as follows:**

**Redlined Section(s)/Marked Tariff:** The TO will produce a redlined Word version of the section(s)/Service Agreement (Marked Tariff) for any PJM Tariff Record being revised (or added, in the case of Tariff Sections). From the Marked Tariff provided, PJM will generate the PDFs of the Marked and Clean versions of the Tariff Record with page numbers to be used as the official Marked and Clean attachments required by FERC.

### **2. Requirements for New Service Agreement are as follows:**

**Clean Section(s)/Clean Tariff:** The TO will produce a clean Word version of the new Service Agreement (Clean Tariff). From the Clean Tariff Record provided, PJM will generate the PDF of the Clean version of the Tariff Record with page numbers to be used as the official Clean attachment required by FERC.

### **3. Formatting Requirements of All Records, Attachments, etc. for E-tariff are as follows:**

#### **a. Attachment Requirements:**

- **Format and Size:** An attachment consists of supporting exhibits, Excel spreadsheets, signature pages, etc. that are not tariff sections. FERC's size limit for attachments is 50 MB and may be provided in PDF (or Excel for formula rates).

- **Cover pages:** Cover pages must be provided for each attachment in a filing and include the name of the attachment (e.g., “Clean Tariff,” “Marked Tariff,” “Signature Pages,” “Exhibit 1,” Exhibit A,” etc.).

**b. Tariff Record Format and Size:** A Tariff Record is the actual document being filed. FERC uses "tariff" generically for any Tariff, Operating Agreement, Service Agreement, etc., that is being filed in eTariff and requires:

- Documents to be uploaded in Microsoft Word format;
- Documents to be no 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 e-Tariff 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;
- Font required for most tariff records should be Times New Roman (12) (PJM will permit a 12 font exception for Attachment H formula rates, only (may have include other exceptions)
- No headers, footers, footnotes or endnotes;
- No automatic generated styles, bullets, outlining, page numbering, section numbering, or Table of Contents;
- No text boxes;
- Images must be in .gif or .jpg format;
- No language in italics (italics in a filing typically indicates pending language (which will be included in the baseline provided by PJM if necessary));
- If applicable, (i.e. new and revised Service Agreements) signatures, titles and/or dates inserted into the Tariff record to match the signatures, titles and/or dates being submitted as an attachment to the filing. Signature pages for Service Agreements should include the Service Agreement Number;

**IV. Filing Summary/Blurb (See No. 8 of the attached PJM Transmission Owner eTariff Transmittal Form) – All filing packages should be accompanied by a Transmission Owner eTariff Transmittal Form, which will need to contain a brief summary of the filing being submitted.**

- **The format for summaries/blurbs for Service Agreement filings is as follows:**

On [Insert Month Date, Year], in Docket No. [ERxx-xxx-000], PJM submitted on behalf of [Company Name] a/an [Insert Type of Service Agreement], designated as Service Agreement No. [Insert SA No.] between/among [insert party names as they appear on the agreement]. [Insert Company Name] is submitting the [Insert Type of Service Agreement] to/ because [Insert Explanation]. [Insert Company Name] is requesting that the [Insert Type of Service Agreement] be effective as of [Insert Requested Effective Date].

- **The format for summaries/blurbs for eTariff filings is as follows:**

On [Insert Month Date, Year], in Docket No. [ERxx-xxx-000], PJM submitted on behalf of [Insert Company Name] revisions/modifications to [Insert Tariff Name], section [Insert Section Name] to/ because [Insert Explanation]. [Insert Company Name] is requesting that the revisions [Insert Tariff Name] be effective as of [Insert Requested Effective Date].



## **PJM Transmission Owner eTariff Transmittal Form**

Please provide the following information with the filing:

1. Filing Company name(s)/Applicant name(s) submitting **as approved by the Commission**:  
\_\_\_\_\_
2. The email address for the attorney(s) submitting the filing (ensure the attorney has been registered with FERC):  
\_\_\_\_\_
3. Short title of filing with maximum of 70 characters or PJM will create a short title form the Filing Summary:
4. Requested 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. Advise of and list any information in the filing that is to be coded as CEII or confidential information.
8. Filing summary (blurb) for use in posting filing to the PJM website and serving the PJM Members and States when applicable. Should be two or three sentences. **(See page 7 of PJM TO Protocol)**



## CONVERSION PROCESS

### Instructions for minimizing the size of images, maps, diagrams, charts and graphs to meet FERC's criteria for filing in eTariff

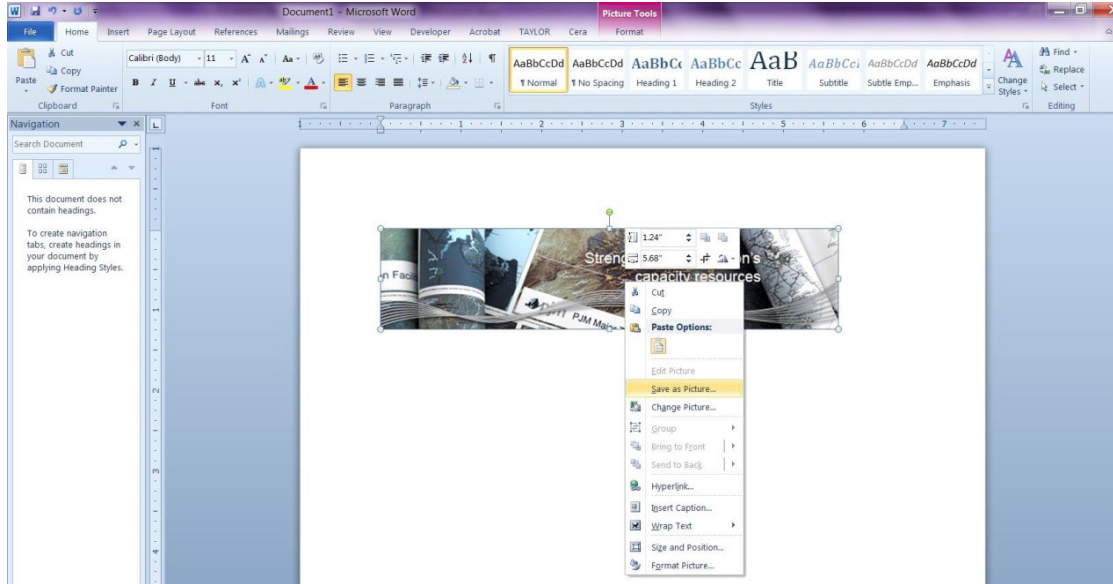
FERC will only accept sections uploaded in the eTariff systems that are less than 10MB. FERC has requirements with regard to the eTariff system which require re-sizing of images, maps, diagrams, charts and graphs. FERC prefers all diagrams, images, etc., to be inserted in .gif or .jpg format.

When the images are not in .gif or .jpg format, they enlarge dramatically when converted into rich text format ("RTF") for filing in the XML. At times, formats other than .gif and .jpg appear to be either redacted sections or blank sections when viewed in the FERC ETariff Viewer. The instructions below are a guideline to assist in changing the format of an image. Please note, this is only one option and there are many others you may prefer to use.

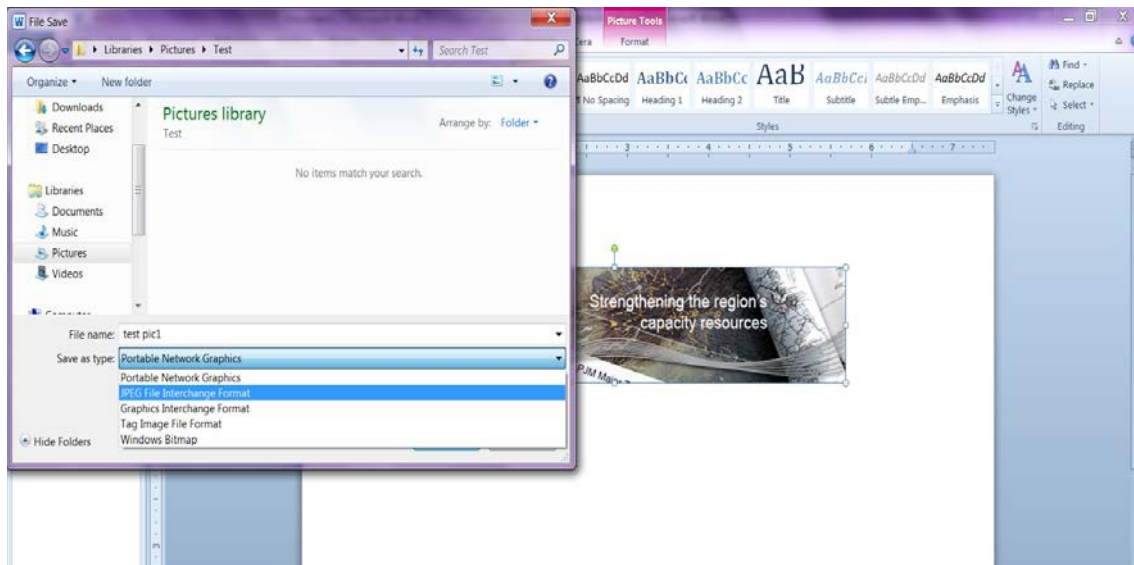
## Conversion Steps for Images, etc.

**Step 1:** Right click on the image you are re-sizing.

**Step 2:** Click on the “Save as Picture” option.



**Step 3:** Save the image by giving it a file name of your choice and selecting either “Graphics Interchange Format” or “JPEG File Interchange Format” from the “Save as type” drop down menu.



**Step 4:** Delete the original image from the document and insert or paste the new .gif or .jpg image into the document.

If there are problems with converting the diagram, FERC's suggests using .gif versus .jpg to convert 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>

### **Resolution Comparison**

This conversion will change the resolution of the map, but will continue to be legible. Below is a comparison for your review of the picture before and after conversion.

Planning picture before conversion



Planning picture after conversion



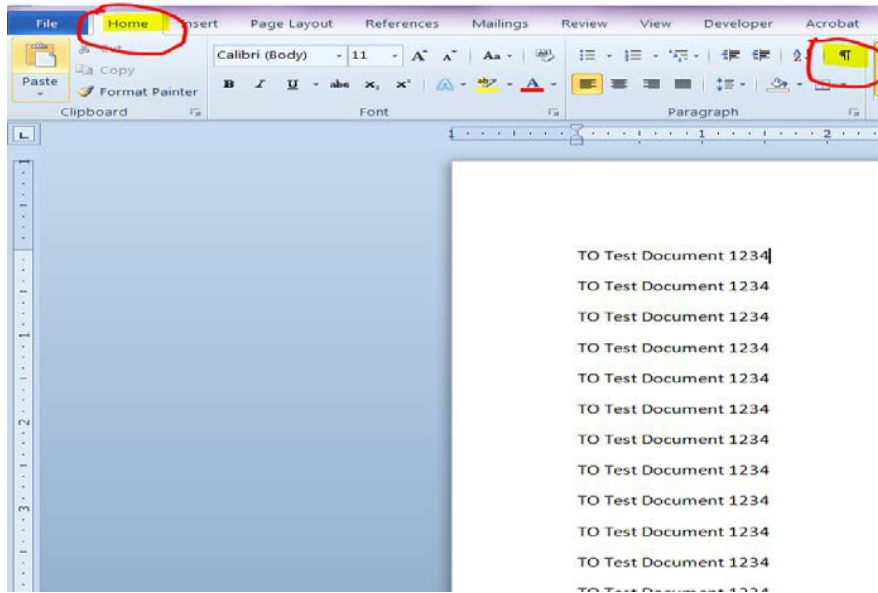
## Checking and Changing Page/Section Numbering

Page numbers are generated when the Marked version or Clean version (for new agreements) are uploaded into eTariff. If a special page/section numbering scheme is embedded in the document uploaded, the generated documents will contain incorrect page numbering. A good way to check to see if your document contains a special page/section numbering scheme, is to insert page numbers in your Word document. If the page numbers do not correspond with the actual number of pages within your document, then you will need to change the numbering scheme. Please remember to remove the page numbers you may have inserted to check your document prior to sending the document to PJM.

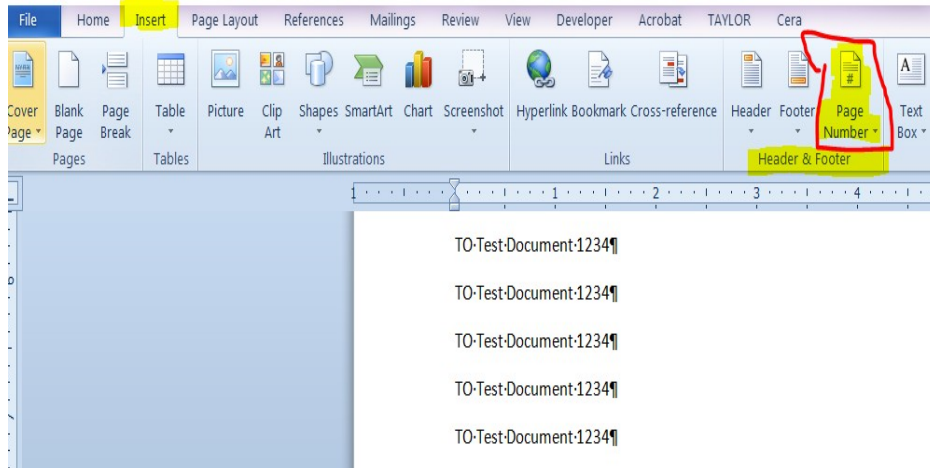
To remove the special page/section numbering scheme, follow the steps below:

**Step 1:** Turn off any track changes you may have on.

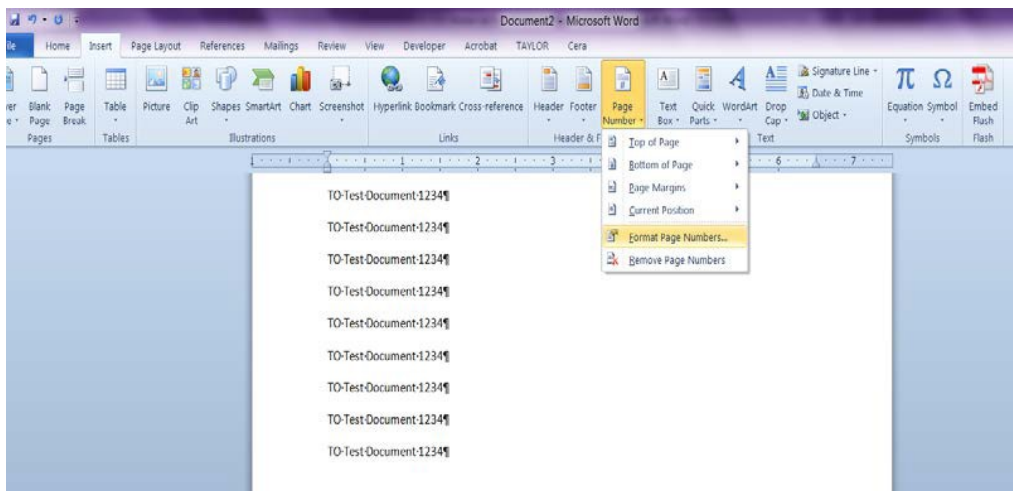
**Step 2:** From the Paragraph section of the Home tab in your Word document, click on the Paragraph button.



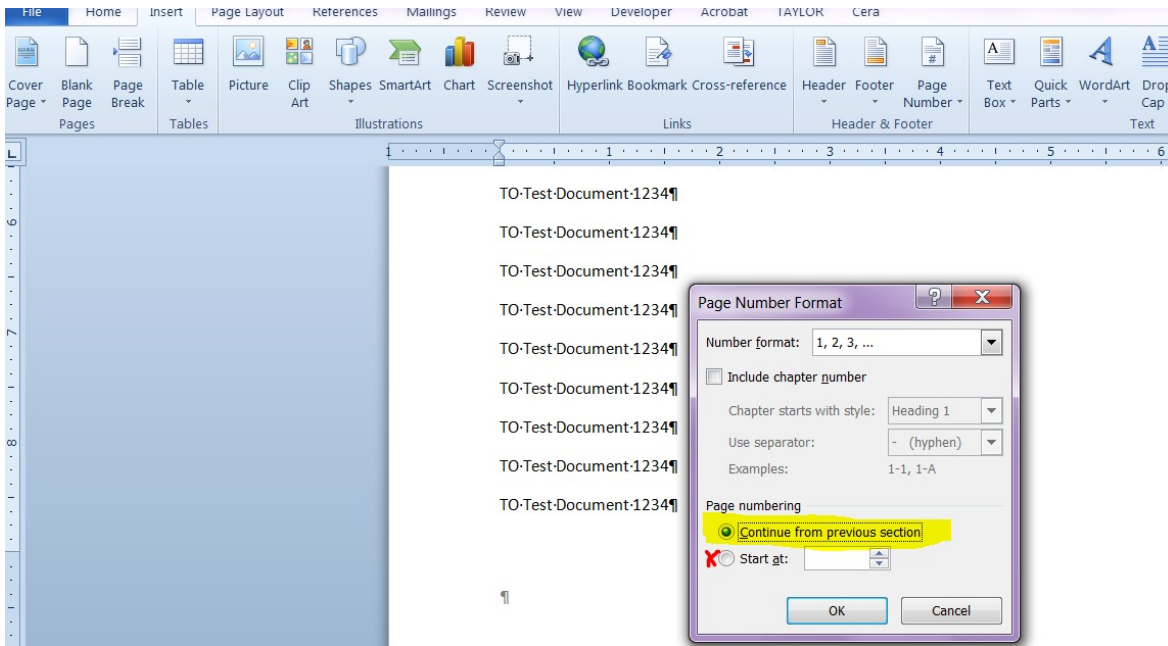
**Step 3:** Go to the page where the special numbering starts, and then click on the Page Number button in the Header & Footer section of the Insert tab.



**Step 4:** Click on the Format Page Numbers option from the drop down.



**Step 5:** Click on the circle next to “Continue from previous section” under Page numbering. Usually, the box next to “Start at” will be checked and a number will appear in the box to the right of that.



**Step 6:** Repeat Step 2.

**Step 7:** Turn on any track changes you may have turned off.