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May 11, 2021

Honorable Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E., Room 1A  
Washington, D.C. 20426

*Re: PJM Interconnection, L.L.C., Docket No. ER21-1016-000  
Informational Report on Status of Tariff Revisions Regarding Interconnection Deficiency  
Review Requirements*

Dear Secretary Bose:

PJM Interconnection, L.L.C. (“PJM”), in compliance with the Commission’s March 31, 2021 order in this proceeding,<sup>1</sup> hereby submits this informational filing on the status of PJM’s efforts, in collaboration with its stakeholders, to improve the Open Access Transmission Tariff (“Tariff”), Part IV, Subpart A interconnection deficiency review deadline requirements in order to allow PJM additional time to meet those deadlines in light of the extremely large number of New Service Requests PJM has received in recent queue windows and expects to continue to receive at the end of New Services Queues for the foreseeable future.<sup>2</sup> PJM submits this filing for informational purposes only; as the March 31 Order notes, it will “not be noticed for comment or require Commission action.”<sup>3</sup>

## **I. BACKGROUND**

On January 29, 2021, PJM requested the Commission to grant it a limited-time waiver of one specific set of deadlines for the New Service Requests deficiency review requirements under

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<sup>1</sup> *PJM Interconnection, L.L.C.*, 174 FERC ¶61,261 (2021) (“March 31 Order”).

<sup>2</sup> Capitalized terms used and not otherwise defined herein shall have the meaning set forth in the Tariff.

<sup>3</sup> March 31 Order at P 22, n.29.

its Tariff in order to allow PJM additional time to meet those deadlines for the AG2 and AH1 New Services Queues.<sup>4</sup> Specifically, PJM sought waiver of the following sections of Tariff, Part IV and Part VI, each of which establishes a five Business Day period for PJM to acknowledge receipt of a New Service Request, undertake a deficiency review of a New Service Request, or review the information provided by an Interconnection Customer in response to the initial deficiency notice, as they apply to New Service Requests received during the last month of the AG2 New Services Queue window and the first month of the AH1 New Services Queue window: sections 36.1.01, 36.1.01(2), 36.1.01(2)(c), and 36.1.01(2)(c)(iii); sections 36.1.03, 36.1.03(2), 36.1.03(2)(c), and 36.1.03(2)(c)(iii); sections 110.1, 110.1(2), 110.1(2)(c) and 110.1(2)(c)(iii); sections 111.1, 111.1(2), 111.1(2)(c) and 111.1(2)(c)(iii); sections 112.1, 112.1(2), 112.1(2)(c) and 112.1(2)(c)(ii); sections 112A.1, 112A.1(2), 112A.1(2)(b) and 112A.1(2)(b)(iii); and sections 204.2.2.1 and 204.2.2.2.<sup>5</sup>

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<sup>4</sup> *PJM Interconnection, L.L.C.*, Request of PJM Interconnection, L.L.C. for Waiver of Tariff Provisions, Docket No. ER21-1016-000 (Jan. 29, 2021) (“January 29 Filing”).

<sup>5</sup> New Service Requests include Interconnection Requests. Transmission Interconnection Requests are addressed in section 36.1.03 of the Tariff, and must submit a complete and fully executed Transmission Interconnection Feasibility Study Agreement, a form of which is located in the Tariff, Attachment S. Pursuant to the Tariff, there are several types of new generation interconnection requests with corresponding applications. Large Generation Interconnection Requests are governed by section 36.1.01 of the Tariff, and must submit a complete and fully executed Generation Interconnection Feasibility Study Agreement, a form of which is located in the Tariff, Attachment N. Small Generation Interconnection Requests for generation resources of 20 MW or less and increases in the capacity of an existing generating unit by 20 MW or less over any consecutive 24-month period are governed by section 36.1.02 of the Tariff, and must submit a complete and fully executed Attachment N Generation Interconnection Feasibility Study Agreement. Small Generation Interconnection Requests for generation resources that are greater than 2 MW (synchronous) or greater than 5 MW (inverter-based) and increases in the capability of an existing generating unit by 20 MW or less but greater than 2 MW (synchronous) or greater than 5 MW (inverter-based) are governed by Subpart G, section 111.1 of the Tariff, and must submit a complete and fully executed Attachment N Generation Interconnection Feasibility Study Agreement. Small Generation Interconnection Requests for temporary energy resource additions of 20 MW or less but greater than 2 MW (synchronous) or greater than 5 MW (inverter-based) are governed by Subpart G, section 112.1 of the Tariff, and must submit a complete and fully executed Attachment N Generation Interconnection Feasibility Study Agreement. Interconnection Requests for permanent or temporary energy resources of 2 MW or less (synchronous) or 5 MW or less (inverter-based) are governed by Subpart G, section 112A.1 of the Tariff, and must submit a complete and fully executed Screens Process Interconnection Request, a form of which is located in the Tariff, Attachment Y. Upgrade Requests for Merchant Network Upgrades are governed by section 204.2.2 of the Tariff, and must submit a complete and fully executed Attachment EE Form of Upgrade Request.

As PJM indicated in the January 29 Filing, PJM requested the waiver in light of the extremely large number of New Service Requests PJM has been receiving in recent queue windows and expected to receive at the end of the AG2 New Services Queue window.<sup>6</sup> PJM also indicated that, through its Planning Committee, PJM was undertaking with its stakeholders a detailed review of its interconnection process with the idea of potentially developing Tariff changes that would improve the interconnection process and could obviate the need for future waivers of the type sought in the January 29 Filing. As discussed further below, at the time of the January 29 Filing, PJM was holding a series of Interconnection Process Workshop meetings within the Planning Committee.

In the March 31 Order, the Commission noted that although it was granting the waiver requested in the January 29 Filing, it had also addressed two prior similar waiver requests filed by PJM in the past year (related to PJM's AF2 and AG1 New Services Queue window). Accordingly, while the Commission agreed that it was appropriate for PJM to explore solutions through its stakeholder process, the Commission made clear that PJM should "timely follow-through on its commitment to revise its deficiency review tariff provisions through its stakeholder process to eliminate the need for similar waiver requests of its deficiency review deadlines in the future."<sup>7</sup> To keep the Commission informed about PJM's progress in the stakeholder process, the Commission directed PJM to submit an informational report within 45 days of the March 31 Order (or, by May 17, 2021) unless PJM's stakeholder process resulted in a Tariff filing with the Commission prior to May 17, 2021.<sup>8</sup>

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<sup>6</sup> January 29 Filing at 2-3, 6-7.

<sup>7</sup> March 31 Order at P 22.

<sup>8</sup> *Id.* at P 22, n.29.

## **II. INFORMATIONAL REPORT ON PJM'S STAKEHOLDER PROCESSES AND PROPOSED DEFICIENCY REVIEW REQUIREMENT TARIFF REVISIONS**

### ***A. Overview***

As indicated in the January 29 Filing, PJM has received each year leading to the AG2 New Services Queue window a record-high volume of New Services Requests.<sup>9</sup> Specifically, there are presently 1,660 New Service Requests submitted from January 1, 2020 through March 31, 2021, including a record-breaking 691 New Service Requests submitted during PJM's most recent closed queue window ending on March 31, 2021.<sup>10</sup>

### ***B. Stakeholder Process***

PJM has been conducting a robust stakeholder process to consider the changes to the deficiency review rules since the fall of 2020. In October 2020, PJM launched a comprehensive set of workshops to explore and collaborate with developers, transmission owners and other stakeholders to improve the interconnection process in step with PJM's rapidly growing New Services Queues and evolving grid. While these workshops concluded on March 5, 2021 with an issue charge and problem statement giving rise to an Interconnection Process Reform Task Force ("IPRTF") process,<sup>11</sup> PJM used its separate Quick Fix process to begin to address the deficiency

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<sup>9</sup> There are a number of reasons for this record increase in New Service Requests. One such factor is Congress' recent further extension of the production tax credit and investment tax credit for renewable energy resources passed in the Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, 134 Stat. 1182 (2020) (enacting the Taxpayer Certainty and Disaster Tax Relief Act of 2020 as Division EE, which amended Sections 45 and 38 of the Internal Revenue Code with regard to the production tax credit and investment tax credit). See *2020 Renewable Energy Industry Outlook*, Deloitte, at 1-4, <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/energy-resources/us-2020-renewable-energy-industry-outlook.pdf> (Nov. 18, 2019).

<sup>10</sup> Consequently, PJM, cumulatively, now has 2,029 active projects at various points in the study process.

<sup>11</sup> See Jack Thomas & Ed Kovler, *IPRTF Participation*, PJM Interconnection, L.L.C. (Apr. 23, 2021), <https://www.pjm.com/-/media/committees-groups/task-forces/iprtf/2021/20210423/20210423-item-02-new-group-kick-off-presentation.ashx>. Meeting materials for the IPRTF are posted on the PJM website. See *Interconnection Process Reform Task Force*, PJM Interconnection, L.L.C., <https://www.pjm.com/committees-and-groups/task-forces/iprtf> (last visited Apr. 26, 2021).

review tariff provisions at the March 9, 2021 Planning Committee (outside of the workshops and the IPRTF process).

As part of the Quick Fix process that commenced on March 9, 2021, PJM proposed an Issue Charge and Problem/Opportunity Statement for stakeholder consideration describing the systemic increase in queue volume of New Service Requests, particularly at the end of a New Services Queue window, and the enhancements that PJM recommends to its rules to address some of the deficiency review problems PJM is encountering as a direct result of the increased number of New Service Requests, particularly at the end of a New Services Queue window. The Issue Charge and Problem/Opportunity Statement were presented at both the Planning Committee (“PC”)<sup>12</sup> and the Markets & Reliability Committee (“MRC”).<sup>13</sup> On May 11, 2021, the PC overwhelmingly endorsed this matter.<sup>14</sup> PJM will be presenting the matter to the MRC for endorsement on May 26, 2021, and to the Members Committee (“MC”) for endorsement on June 23, 2021. PJM targets submitting the proposed Tariff revisions to the Commission by the end of June 2021.

### ***C. General Description of Present Version of Proposed Revisions***

Consistent with the January 29 Filing, PJM’s proposed Tariff revisions (presented as informational only thus far in the Quick Fix process) are designed to afford PJM flexibility in

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<sup>12</sup> See Jason Connell, *New Service Requests Deficiency Review Requirements*, PJM Interconnection, L.L.C. (April 6, 2021), <https://pjm.com/-/media/committees-groups/committees/pc/2021/20210406/20210406-item-10a-new-service-requests-deficiency-review-requirements.ashx> (last visited May 11, 2021).

<sup>13</sup> See Jason Connell, *New Service Requests Deficiency Review Requirements*, PJM Interconnection, L.L.C. (April 21, 2021), <https://pjm.com/-/media/committees-groups/committees/mrc/2021/20210421/20210421-item-04-1-new-service-requests-deficiency-review-requirements.ashx> (last visited May 11, 2021).

<sup>14</sup> While proposed tariff redline changes were presented for informational purposes only, at this stage of the stakeholder process, the PC endorsement is only with regard to the proposed Issue Charge and Problem/Opportunity Statement.

addressing the large volume of New Service Requests PJM receives at the end of New Services Queue windows by increasing beyond the presently applicable Tariff deadlines the amount of time for PJM's acknowledgment, deficiency review and review of deficiency responses of New Service Requests submitted in New Services Queue windows. The present language in the Tariff establishes relatively tight time frames that: (1) require PJM to acknowledge receipt of and review a New Service Request, and issue a notice of any deficiencies, within five Business Days of receipt of that request ("Acknowledgement and Review Phase"); (2) require the Interconnection Customer to respond to a deficiency notice within 10 Business Days; and (3) provide PJM with an additional five Business Days to review the Interconnection Customer's response to the deficiency notice ("Response Phase"). The proposed Tariff revisions provide additional periods of time to PJM for the Acknowledgement and Review Phase and the Response Phase in order to allow PJM employees sufficient time to process and meaningfully review the large number of New Service Requests that are submitted at the end of the New Services Queue windows. New Service Customers would continue to have the same time periods to provide their responses to PJM deficiency notices established in the Tariff, commencing as of the dates they receive their deficiency notices from PJM.

In response to requests by some of PJM's stakeholders during the stakeholder process to date, PJM is also proposing a "soft close" of March 10 and September 10 for its New Services Queue windows to allow more time to review the New Service Requests without inadvertently shortening the amount of time available for the resulting model builds and analyses. In accordance with the "soft close" revisions, no Generation Interconnection Requests will be accepted for the relevant New Services Queue after the March 10 and September 10 dates even though the New

Services Queue windows run from October 1 through March 31, and April 1 through September 30.<sup>15</sup> PJM also proposes to address some ministerial clean-up changes.

### **III. COMMUNICATIONS AND CORRESPONDENCE**

All notices, communications or correspondences addressed to PJM regarding this matter should be directed to, and PJM requests that the Secretary include on the Commission's official service list, the following:

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### **IV. SERVICE**

PJM has served a copy of this filing on all PJM Members and on the affected state utility regulatory commissions in the PJM Region by posting this filing electronically. In accordance with the Commission's regulations,<sup>16</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>17</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

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<sup>15</sup> In examining the "soft close" approach, PJM identified and is also proposing to delete an obsolete term, "New Services Queue Closing Date," in its Tariff, Definitions section.

<sup>16</sup> See 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).

<sup>17</sup> PJM already maintains, updates, and regularly uses e-mail lists for all PJM Members and affected state commissions.

will be available through the referenced link within twenty-four hours of the filing.

**V. CONCLUSION**

PJM respectfully submits this informational report in compliance with the March 31 Order.

Respectfully submitted,



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*On behalf of*  
*PJM Interconnection, L.L.C.*



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document on those parties on the official Service List compiled by the Secretary in these proceedings.

Dated at Audubon, Pennsylvania this 11th day of May, 2021.

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