



2750 Monroe Boulevard
Valley Forge Corporate Center
Audubon, PA 19403

Steven R. Pincus
Associate General Counsel
T: (610) 666-4370 | F: (610) 666-8211
steven.pincus@pjm.com

October 22, 2021

The 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. ER21-2524-001
Compliance Filing and Request for Waiver of Certain NAESB Business Practice Standards
ERRATA FILING*

Dear Secretary Bose:

PJM Interconnection, L.L.C. submits this *errata* filing (“Errata Filing”) to the filing submitted on July 27, 2021, in the above referenced proceeding (the “July 27 Filing”) to amend the revisions to the PJM Open Access Transmission Tariff (“Tariff”) submitted to comply with the Final Rule issued on February 4, 2020, by the Federal Energy Regulatory Commission (“Commission”) in Docket No. RM05-5-027 (“Final Rule” or “Order No. 676-I”).¹ Specifically, PJM seeks to align the Tariff changes included in the July 27 Filing with the Commission’s revisions to the regulatory text included with the Final Rule pursuant to an Errata Notice issued by the Commission on March 3, 2020, in this proceeding (“Errata Notice”).² Also, PJM requests the effective date of the proposed Tariff revisions be changed from October 27, 2021, to an indeterminate effective date (12/31/9998) for the Tariff record, consistent with the Notice of

¹ *Standards for Business Practices and Communication Protocols for Public Utilities*, 170 FERC ¶ 61,062 (2020).

² *Standards for Business Practices and Communication Protocols for Public Utilities*, Errata Notice (March 3, 2020).

Extension of Time issued by the Commission on April 3, 2020, in this proceeding (“Notice of Extension of Time”).³

I. BACKGROUND

In the Final Rule, the Commission amended its regulations to incorporate by reference, with certain exceptions, Version 003.2 of the Wholesale Electric Quadrant (“WEQ”) of the North American Energy Standards Board (“NAESB”) Business Practice Standards (“WEQ Version 003.2 Standards”).⁴ The Commission also directed each public utility to submit a compliance filing by July 27, 2021, to incorporate the WEQ Version 003.2 Standards into their respective Open Access Transmission Tariff by reference, request waiver of certain standards, or both.⁵

Subsequent to the Commission’s issuance of Order No. 676-I, the *Federal Register* published the final rule on February 25, 2020.⁶ In publishing the final rule, the *Federal Register* made various formatting and editorial changes to the text of the regulations, 18 C.F.R. §§ 2.27 and 38.1, in which the Commission incorporated by reference NAESB’s WEQ Business Practice Standards. As a result, the Commission issued the Errata Notice, which stated that the regulatory text included with the Commission’s Order No. 676-I was revised to reflect the regulatory text as published in the *Federal Register*.⁷ However, the Tariff changes included in the July 27 Filing were not based on the regulatory text included with the Final Rule pursuant to the Errata Notice.

³ *Standards for Business Practices and Communication Protocols for Public Utilities*, Notice of Extension of Time (April 3, 2020).

⁴ Order No. 676-I at P 1.

⁵ *Id.* at P 63.

⁶ *Standards for Business Practices and Communication Protocols for Public Utilities*, 85 Fed. Reg. 10,571 (Feb. 25, 2020).

⁷ The revised regulatory text as revised by Office of the Federal Register is attached to this Errata Notice, in a clean version and with the changes marked.

In the Notice of Extension of Time, the Commission extended the deadline for public utilities required to make a compliance filing to comply with the Final Rule from May 25, 2020, up to and including July 27, 2021. In doing so, the Commission stated that “in its order(s) on compliance filings, the Commission will determine an implementation date for all utilities, including utilities whose tariffs incorporate each version of the NAESB standards, without modification, when the version is accepted by the Commission, no sooner than three months following the submission of compliance filings (i.e., October 27, 2021).”

II. DESCRIPTION OF ERRATA REVISIONS AND EFFECTIVE DATE

PJM amends the July 27 Filing in two respects:

1. PJM submits revised versions of the Tariff changes included in the July 27 Filing based on the Commission’s revisions to the regulatory text included with the Final Rule pursuant to the Errata Notice; and
2. Consistent with the Notice of Extension of Time, PJM requests that the effective date for the proposed Tariff revisions change from October 27, 2021, to an indeterminate effective date (12/31/9998) for the Tariff record to allow for an effective date not sooner than October 27, 2021.

PJM reiterates and incorporates by reference its request for waivers of the NAESB Business Practice Standards, and the requests to continue previously-accepted variations of the NAESB Business Practice Standards as set forth in the April 27 Filing. If PJM’s request for waivers described in the April 27 Filing are denied, PJM requests an additional twelve months to comply with the WEQ Version 003.2 Standards to allow PJM to make the necessary coding changes to comply with those requirements.

III. DOCUMENTS ENCLOSED

PJM encloses the following documents with this transmittal letter:

1. a redlined version of the proposed revisions to the PJM Tariff (Attachment A); and
2. a clean version of the proposed revisions to the PJM Tariff (Attachment B).

IV. CORRESPONDENCE AND COMMUNICATIONS

Correspondence and communications regarding this filing should be sent to the following individuals:

Craig Glazer
Vice President—Federal Gov't Policy
PJM Interconnection, L.L.C.
1200 G Street, N.W.
Suite 600
Washington, D.C. 20005
(202) 423-4743
craig.glazer@pjm.com

Steven R. Pincus
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Valley Forge Corporate Center
Audubon, PA 19403
(610) 666-4370
steve.pincus@pjm.com

V. SERVICE

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,⁸ PJM will post a copy of this filing to the FERC Filings section of its Web site, located at <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 region⁹ alerting them of the filing and its availability on PJM's website. PJM also serves the parties listed on the Commission's official service list for this docket. Notwithstanding the foregoing, if the document

⁸ See 18C.F.R §§ 35.2(e) and 385.2010(f)(3).

⁹ PJM already maintains updates and regularly uses e-mail lists for all PJM members and affected state commissions.

is not immediately available by using the referenced link, it will be available within 24 hours of the filing. A copy of this filing will also be available on the Commission's eLibrary website located at <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.

Respectfully submitted,

/s/ Steven R. Pincus

Craig Glazer
Vice President—Federal Gov't Policy
PJM Interconnection, L.L.C.
1200 G Street, N.W.
Suite 600
Washington, D.C. 20005
(202) 423-4743
craig.glazer@pjm.com

Steven R. Pincus
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Valley Forge Corporate Center
Audubon, PA 19403
(610) 666-4370
steven.pincus@pjm.com

Cc (via electronic mail): William Lohrman, FERC Staff

CERTIFICATE OF SERVICE

I hereby certify that this day I caused to be served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Audubon, PA this 22nd day of October, 2021.

/s/ Steven R. Pincus

Steven R. Pincus
Attorney for PJM Interconnection, L.L.C.

Attachment A

Revisions to the PJM Open Access Transmission Tariff

(Marked / Redline Format)

4.2

Pursuant to the Commission's ~~September-February 1824, 2014-2020~~ Final Rule, Order No. 676-HI (~~148-170~~ FERC ¶ 61, ~~205062, corrections applied at 149 FERC ¶ 61,014~~) amending its regulations under the Federal Power Act, and the grant of waivers from specified provisions of WEQ-001, WEQ-002 and WEQ-003 approved by the Commission in *PJM Interconnection, L.L.C.*, 151 FERC ¶ 61,141 (May 18, 2015) and in response to PJM's compliance filing for Order No. 676-I, the Transmission Provider hereby incorporates by reference the following standards promulgated by the WEQ of the NAESB:

- (1) ~~WEQ-000, Abbreviations, Acronyms, and Definition of Terms, standard WEQ-000-2; ([WEQ] Version 003.1, September 30, 2015), including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012, Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);~~
- (2) WEQ-000, Abbreviations, Acronyms, and Definition of Terms ([WEQ] Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
- (3) ~~To the extent not inconsistent with Transmission Provider's current NITS practices and procedures, WEQ-001, Open Access Same-Time Information System (OASIS), [OASIS] Version 2.02; ([WEQ] Version 003.2, Dec. 8, 2017), July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) excluding sStandards WEQ-001-9 preamble text, WEQ-001-10 preamble text, WEQ-001-9.5, WEQ-001-10.5, WEQ-001-14.1.3, WEQ-001-15.1.2, and WEQ-001-106.2.5, WEQ-001-25 in its entirety, as well as the timing requirements established in 001-23, to the extent not inconsistent with Transmission Provider's current practice;~~
- (4) ~~To the extent not inconsistent with Transmission Provider's current NITS practices and procedures, WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.02; ([WEQ] Version 003.2, Dec.8, 2017), excluding July 31, 2012, as modified by NAESB final actions ratified on Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);~~
- (5) ~~To the extent not inconsistent with Transmission Provider's current NITS practices and procedures, WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary Business Practice Standards, [OASIS] Version 2.02; ([WEQ] Version 003.2, Dec. 8, 2017) July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26 Jul. 23, 20193);~~
- (6) ~~WEQ-004, Coordinate Interchange; ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012 (with Final Action ratified December 28, 2012);~~

- ~~(7) WEQ-005, Area Control Error (ACE) Equation Special Cases; ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012;~~
- ~~(8) WEQ-006, Manual Time Error Correction; ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012;~~
- ~~(9) WEQ-007, Inadvertent Interchange Payback; ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012;~~
- ~~(10) WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection; ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012 (with minor corrections applied November 28, 2012);~~
- ~~(11) WEQ-011, Gas/Electric Coordination; ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012;~~
- ~~(12) WEQ-012, Public Key Infrastructure (PKI); ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012 (as modified by NAESB Final Actions ratified on October 4, 2012);~~
- ~~(13) WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, [OASIS] Version 2.20; ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);~~
- ~~(14) WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response; ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012; and~~
- ~~(15) WEQ-021, Measurement and Verification of Energy Efficiency Products; ([WEQ] Version 003.2, Dec. 8, 2017); July 31, 2012.;~~
- ~~(16) WEQ-022, Electric Industry Registry ([WEQ] Version 003.2, Dec. 8, 2017); and~~
- ~~(17) WEQ-023, Modeling. ([WEQ] Version 003.2, Dec. 8, 2017), including only: standards WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A.~~

The Commission has granted Transmission Provider with waivers of specified provisions of WEQ-001, WEQ-002 and WEQ-003 as those Business Practice Standards relate to Service

Across Multiple Transmission Systems (SAMTS) and Network Integration Transmission Service (NITS).

With respect to SAMTS, the Transmission Provider has adopted Tariff, Part II, section 17.9 and Tariff, Part II, section 18.4, specifying processing timelines for all short-term transmission service requests. The Transmission Provider will process and set the status of a SAMTS request or reservation consistent with a non-SAMTS transaction and the customer may withdraw, annul or reduce their request or reservation without financial penalty in accordance with the Transmission Provider's Regional Transmission and Energy Scheduling Practices document which can be found on the Transmission Provider's website.

With respect to NITS requests, the Transmission Provider has adopted rules in Tariff, Part III relating to the study and commitment of internal and external network resources and load designations, including Tariff, Part III, section 30 (relating to designation and termination of Network Resources), Tariff, Part III, section 31 (relating to the designation of Network Load), and Tariff, Part III, section 32 (relating to Initial Study procedures for NITS), all of which are subject, however, to the applicable requirements of PJM's Reliability Pricing Model (RPM) rules as set forth in Tariff, Attachment DD and associated requirements as set forth in Transmission Provider's FERC-filed Reliability Assurance Agreement Among Load Serving Entities (RAA) and associated Manuals. Moreover, consistent with the Transmission Provider's planning processes, Network Resources proposing to interconnect to the Transmission System in the PJM Region must comply with the terms, conditions, rules and procedures for interconnection as specified in Tariff, Part IV.

Attachment B

Revisions to the PJM Open Access Transmission Tariff

(Clean Format)

4.2

Pursuant to the Commission's February 24, 2020 Final Rule, Order No. 676-I (170 FERC ¶ 61, 062) amending its regulations under the Federal Power Act, and the grant of waivers from specified provisions of WEQ-001, WEQ-002 and WEQ-003 approved by the Commission in *PJM Interconnection, L.L.C.*, 151 FERC ¶ 61,141 (May 18, 2015) and in response to PJM's compliance filing for Order No. 676-I, the Transmission Provider hereby incorporates by reference the following standards promulgated by the WEQ of the NAESB:

- (1) WEQ-000, Abbreviations, Acronyms, and Definition of Terms, standard WEQ-000-2 ([WEQ] Version 003.1, September 30, 2015), including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction;
- (2) WEQ-000, Abbreviations, Acronyms, and Definition of Terms ([WEQ] Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
- (3) To the extent not inconsistent with Transmission Provider's current NITS practices and procedures, WEQ-001, Open Access Same-Time Information System (OASIS), [OASIS] Version 2.2 ([WEQ] Version 003.2, Dec. 8, 2017), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, WEQ-001-9.5, WEQ-001-10.5, WEQ-001-14.1.3, WEQ-001-15.1.2, WEQ-001-106.2.5, WEQ-001-25 in its entirety, as well as the timing requirements established in 001-23, to the extent not inconsistent with Transmission Provider's current practice;
- (4) To the extent not inconsistent with Transmission Provider's current NITS practices and procedures, WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 ([WEQ] Version 003.2, Dec.8, 2017), excluding;
- (5) To the extent not inconsistent with Transmission Provider's current NITS practices and procedures, WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary Business Practice Standards, [OASIS] Version 2.2 ([WEQ] Version 003.2, Dec. 8, 2017) (with minor corrections applied Jul. 23, 2019);
- (6) WEQ-004, Coordinate Interchange ([WEQ] Version 003.2, Dec. 8, 2017);
- (7) WEQ-005, Area Control Error (ACE) Equation Special Cases ([WEQ] Version 003.2, Dec. 8, 2017);
- (8) WEQ-006, Manual Time Error Correction ([WEQ] Version 003.2, Dec. 8, 2017);
- (9) WEQ-007, Inadvertent Interchange Payback ([WEQ] Version 003.2, Dec. 8, 2017);
- (10) WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection ([WEQ] Version 003.2, Dec. 8, 2017);

- (11) WEQ-011, Gas/Electric Coordination, ([WEQ] Version 003.2, Dec. 8, 2017);
- (12) WEQ-012, Public Key Infrastructure (PKI) ([WEQ] Version 003.2, Dec. 8, 2017);
- (13) WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, [OASIS] Version 2.2 ([WEQ] Version 003.2, Dec. 8, 2017) ;
- (14) WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response ([WEQ] Version 003.2, Dec. 8, 2017);
- (15) WEQ-021, Measurement and Verification of Energy Efficiency Products ([WEQ] Version 003.2, Dec. 8, 2017);
- (16) WEQ-022, Electric Industry Registry ([WEQ] Version 003.2, Dec. 8, 2017); and
- (17) WEQ-023, Modeling. ([WEQ] Version 003.2, Dec.8, 2017), including only: standards WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ- 023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A.

The Commission has granted Transmission Provider with waivers of specified provisions of WEQ-001, WEQ-002 and WEQ-003 as those Business Practice Standards relate to Service Across Multiple Transmission Systems (SAMTS) and Network Integration Transmission Service (NITS).

With respect to SAMTS, the Transmission Provider has adopted Tariff, Part II, section 17.9 and Tariff, Part II, section 18.4, specifying processing timelines for all short-term transmission service requests. The Transmission Provider will process and set the status of a SAMTS request or reservation consistent with a non-SAMTS transaction and the customer may withdraw, annul or reduce their request or reservation without financial penalty in accordance with the Transmission Provider's Regional Transmission and Energy Scheduling Practices document which can be found on the Transmission Provider's website.

With respect to NITS requests, the Transmission Provider has adopted rules in Tariff, Part III relating to the study and commitment of internal and external network resources and load designations, including Tariff, Part III, section 30 (relating to designation and termination of Network Resources), Tariff, Part III, section 31 (relating to the designation of Network Load), and Tariff, Part III, section 32 (relating to Initial Study procedures for NITS), all of which are subject, however, to the applicable requirements of PJM's Reliability Pricing Model (RPM) rules as set forth in Tariff, Attachment DD and associated requirements as set forth in Transmission Provider's FERC-filed Reliability Assurance Agreement Among Load Serving Entities (RAA) and associated Manuals. Moreover, consistent with the Transmission Provider's planning processes, Network Resources proposing to interconnect to the Transmission System in

the PJM Region must comply with the terms, conditions, rules and procedures for interconnection as specified in Tariff, Part IV.