

September 29, 2022

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. ER22-2110-001,
Submission of Response to Deficiency Letter

Dear Secretary Bose:

PJM Interconnection, L.L.C. (“PJM”) submits for filing this response to the letter dated August 30, 2022, in the referenced docket, requesting additional information.¹ On June 14, 2022, pursuant to section 205 of the Federal Power Act (“FPA”), 16 U.S.C. § 824d, PJM submitted revisions and additions to the PJM Open Access Transmission Tariff (“Tariff”).² The proposed revisions and additions would transition PJM’s interconnection processes from a serial “first-come, first-served” queue approach to a “first-ready, first-served” Cycle³ approach.

I. REQUESTED EFFECTIVE DATE AND ACTION DATE

PJM respectfully renews its request for an effective date of January 3, 2023, for revised Tariff, Parts II, III, IV, VI, and new Tariff, Parts VII and IX. Good cause exists to grant PJM’s requested effective date. First, the Commission often permits applicants to retain their original requested effective date when a filing is made in good faith to cure a deficiency.⁴ Second, the June 14 Filing provided the required notice as to the timing of the proposed additions’ and revisions’ impact on PJM’s interconnection processes and the transition from the existing process to the new process, and this filing gives notice of PJM’s desire to retain that date in the wake of the deficiency letter. As such, no party will be prejudiced by adoption of the originally requested effective date. Third, adoption of the

¹ *PJM Interconnection, L.L.C.*, Deficiency Letter, Docket No. ER22-2110-000 (Aug. 30, 2022) (“August 30 Letter”).

² *PJM Interconnection, L.L.C.*, Tariff Revisions for Interconnection Process Reform, Request for Commission Action by October 3, 2022, and Request for 30-Day Comment Period, Docket No. ER22-2110-000 (June 14, 2022) (“June 14 Filing”).

³ Capitalized terms not defined herein have the meanings set forth in the Tariff or in the June 14 Filing’s proposed Tariff, Parts VII, VIII, and IX.

⁴ See, e.g., *Midwest Indep. Transmission Sys. Operator, Inc.*, 105 FERC ¶ 61,076 (2003) (granting requested effective date following supplemental filing in response to deficiency letter).

originally requested effective date will allow PJM to begin the transition from the existing process to the new process in accordance with its planned timeline.

PJM further respectfully requests that the Commission issue an order accepting the June 14 Filing, without condition or modification, no later than November 30, 2022.⁵ This action date will provide sufficient time for PJM and its stakeholders to prepare for the effectiveness of the transition provisions of the June 14 Filing and for PJM to make any required compliance filing.

II. RESPONSES TO THE AUGUST 30 LETTER'S SPECIFIC QUESTIONS⁶

- 1. PJM proposes to remove Tariff, Part II, section 19.8 and Tariff, Part III, section 32.5, which provide for, among other things, reporting and penalties applicable to PJM if it fails to complete a certain percentage of transmission service request studies in a certain timeframe. These provisions were accepted as part of PJM's Order No. 890 compliance filing.**

Please explain how the proposed removal of these sections is consistent with or superior to the reporting and penalty requirements of Order No. 890.

Response

PJM seeks an independent entity variation to allow it to remove Tariff, Part II, section 19.8 and Tariff, Part III, section 32.5 from the Tariff to avoid having in the Tariff carry-over penalty requirements associated with the processing of Long-Term Firm Transmission Service and Network Integration Transmission Service requests ("Firm Transmission Service Requests") that will prove unworkable and discriminatory when applied to the new process that analyzes requests on a cluster basis. PJM believes that the issue of whether to apply penalties for delays in the interconnection process is best addressed holistically as a policy matter in the Final Rule coming out of the Commission's Interconnection NOPR proceeding,⁷ rather than simply carrying through existing language on penalties for one narrow set of requests (Firm Transmission Service Requests), which provisions will prove unworkable when applied in the context of the new clustered study approach. As a result, PJM proposes the removal of the existing language without prejudice to the Commission addressing the penalties issue holistically in the Interconnection NOPR proceeding. Similarly, PJM is proposing changes to ensure that the reporting requirements in the Tariff are harmonized.

⁵ PJM has assigned an effective date of November 30, 2022, to one eTariff record (Tariff, Part II, section 15.7) submitted with this filing (in metadata only) in order to effectuate Commission action by this date.

⁶ The internal citations contained in the deficiency letter have been omitted from this response.

⁷ *Improvements to Generator Interconnection Procedures and Agreements*, Notice of Proposed Rulemaking, 179 FERC ¶ 61,194, at PP 168-69 (2022) ("Interconnection NOPR").

Specifically, as to the metrics and reporting requirements, the Order No. 845⁸ metrics and reporting requirements to which PJM's Interconnection Planning departments are subject apply also to studies of Firm Transmission Service Requests.⁹ Having overlapping reporting requirements in more than one place in the Tariff (i.e., in both the Tariff, Part II, section 19.8 and Tariff, Part III, section 32.5 penalty provisions and in the separate Order No. 845 metrics and reporting requirements) risks inconsistent or worse, conflicting, calculation of the metrics, which would confuse the reporting. While the potential for confusion existed in the past, PJM submits that clear calculation and reporting of study metrics is superior to inconsistent and potentially confusing metrics and reporting. PJM sought to address this as part of June 14 Filing, and requested there that the Commission grant it an independent entity variation to allow it to remove Tariff, Part II, section 19.8 and Tariff, Part III, section 32.5.¹⁰

In a similar vein, PJM proposes to remove the penalties in Tariff, Part II, section 19.8 and Tariff, Part III, section 32.5 for delays in studies of Firm Transmission Service Requests to put such requests on the same footing as other New Service Requests, for which there are no penalties. In response to a number of Commission orders, PJM submitted a filing in Docket Nos. ER07-344 and EL06-67 to consolidate in a single, new Part VI of the Tariff, all provisions regarding the studies, agreements, and rights that pertain to the various customer-initiated projects and service requests that may result in participant-funded upgrades to the PJM transmission system.¹¹ In the existing serial process, Firm Transmission Service Requests are studied and attributed cost allocation serially. Firm Transmission Service Requests do not necessarily contribute to the need for any system reinforcements. In those instances, PJM can move them out of the study process and advance them to the agreement stage, thereby not incurring penalties for study delays. However, under the proposed clustered study process, all requests are studied together, i.e., rather than studying the impact of each interconnection request or Firm Transmission Service Request individually, PJM will be studying the impact of the entire cluster. This change to the process makes it more likely that Firm Transmission Service Requests will contribute to the need for Network Upgrades to which other New Service Requests also

⁸ *Reform of Generator Interconnection Procedures and Agreements*, Order No. 845, 163 FERC ¶ 61,043 (2018), *order on reh'g & clarification*, Order No. 845-A, 166 FERC ¶ 61,137, *order on reh'g & clarification*, Order No. 845-B, 168 FERC ¶ 61,092 (2019).

⁹ June 14 Filing at Attachment C ¶ 32 (Affidavit of Jason P. Connell (Connell Aff.)). To date, however, the PJM metrics reports have not broken the transmission request-related studies out from all other New Service Requests. *Id.* The Order No. 845 metrics and reporting requirements are set forth in Part VI, Subpart A, section 41 of PJM's existing Tariff, and in proposed Tariff, Part VII, Subpart E, section 333 and proposed Tariff, Part VIII, Subpart E, section 431

¹⁰ June 14 Filing at 72-74 & Connell Aff. ¶¶ 32-35.

¹¹ *See PJM Interconnection, L.L.C.*, Letter Order, Docket Nos. ER07-344-000, EL06-67-001, at PP 1-2 (Feb. 8, 2007) (letter order accepting filing); *PJM Interconnection, L.L.C.*, Filing of Tariff Revisions, Docket Nos. ER07-344-000, EL06-67-001, at 3-5 (Dec. 18, 2007) (PJM filing to revise and consolidate Tariff provisions and background section describing need for filing); *see also at Chesapeake Transmission, L.L.C. v. PJM Interconnection, L.L.C.*, 116 FERC ¶ 61,234, at P 37 (2008) (directing PJM to propose Tariff revisions clarifying how it will determine priority between merchant transmission projects and projects funded for transmission service requests).

contribute. It also means that the Firm Transmission Service Requests are tied inextricably to the cluster—there will no longer be an opportunity for PJM to remove Firm Transmission Service Requests from the interconnection process and advance them. If the cluster study is delayed for any reason, even for reasons not related to the Firm Transmission Service Requests, PJM will be subject to the penalties under Tariff, Part II, section 19.8 and Tariff, Part III, section 32.5 as they relate to delays in processing of Firm Transmission Service Requests. In short, whether under the currently effective interconnection rules in the Tariff or the proposed Transition Period Rules and New Rules, PJM processes Firm Transmission Service Requests along with all other New Service Requests, including generator Interconnection Requests. However, if the existing language is simply carried over to the new process, only Firm Transmission Service Requests have the potential to trigger penalties.

PJM is mindful that the Commission is considering the imposition of penalties associated with delays in interconnection service requests (and by extension presumably any Firm Transmission Service Requests to the extent they are incorporated in the interconnection process) in its Interconnection NOPR proceeding. The Interconnection NOPR, issued after the June 14 Filing, proposes to impose penalties for all planning and study delays, including generator interconnection requests.¹² PJM believes the use of penalties as a means to address interconnection service request delays is best addressed comprehensively in that docket. In addition, in that docket, the Commission made clear that the June 14 Filing, a FPA section 205 filing, would be judged relative to the status quo and not as compared to the proposed reforms in that docket.¹³ As a result, PJM believes it would be appropriate for the Commission to accept PJM's proposed elimination of the penalty provisions for Firm Transmission Service Requests given their potential incomplete and arbitrary application under the proposed new clustered process, without prejudice to the Commission comprehensively addressing this issue on a going forward basis in its Final Rule in the NOPR proceeding.¹⁴ As explained above, the existing Tariff provisions do not work well with the new cluster study approach for both interconnection and Firm Transmission Service Requests and could lead to arbitrary and discriminatory application of the existing penalties.

Finally, PJM notes that as metrics for studies of Firm Transmission Service Requests are included in the Order No. 845 reports PJM files, the Commission and interested parties will have information regarding any delays in studies for Firm

¹² *Id.*

¹³ See Interconnection NOPR at P 6 (recognizing that transmission providers are engaged in queue reform efforts, and stating that nothing is intended to deter those efforts. The Commission also stated it “will review any filings that result from those efforts based on the record before us in those proceedings and not based on whether they comply with the proposed reforms in this NOPR”).

¹⁴ PJM strongly believes that penalties for study delays are ineffective and unduly punitive measures to combat study delays, which are occurring not because transmission providers are delinquent but because of the extraordinary volume of Interconnection Requests and the structural problems with a serial queue process, as discussed in the June 14 Filing. June 14 Filing at 19-25.

Transmission Service Requests that might occur in the future and will be able to monitor PJM's performance of such studies.¹⁵

2. **As part of the proposed tariff provisions in both the Transition Cycle (Proposed Tariff, Part VII, Subpart D, section 307(A)(4)(c)) and New Rules (Proposed Tariff, Part VIII, Subpart C, section 404(A)(4)(c)) regarding additional system impact study procedures for Eligible Customers, PJM proposes that “[r]equests for long-term firm transmission service will be evaluated, to the extent possible, as a part of the on-going planning process for Bulk Transmission Supply in the PJM Region.” PJM also proposes that the type of the request (i.e., short-term or long-term) and whether the request is made during a normal planning cycle be determinative for whether the request is included in the aggregate planning process or requires a special impact study. Specifically, these sections state:**

The loads and resources of Eligible Customers requesting new or additional service during the normal planning cycle will be incorporated into this aggregate planning process along with the loads and resources of all other Firm Point-to-Point and load serving entities for which prior commitments to provide service have been made. Requests for long-term firm service made at times that will not permit the evaluation of impacts as part of the normal planning process, and requests for short-term firm service, will require that special impact studies be completed.

Please explain how PJM will determine, under the transition process rules and the new rules, whether a request for long-term firm service can be studied as part of the planning process for Bulk Transmission Supply in the PJM Region or whether special impact studies must be completed.

¹⁵ Although not proposed in this filing, another approach to this issue would simply be removal of Firm Transmission Service Requests from the interconnection process, similar to the June 14 Filing's proposal to remove Upgrade Requests from the interconnection process, and establish a separate process for them. *See* June 14 Filing at 61-64. This would enable PJM to study Firm Transmission Service Requests separately and more expeditiously. Because this alternative approach would be a departure from the stakeholder-endorsed package contained in the June 14 Filing, PJM would commit to reviewing this alternative with stakeholders. However, in the interim, inconsistent and arbitrary application of penalties through the “carry over” of the existing penalty provisions, which do not fit well with the new clustered process, would not be just and reasonable. As a result, PJM urges adoption of the June 14 Filing's proposal under the Commission's FPA section 205 standard of review without prejudice to future changes which could be made either through the stakeholder process or on compliance with the Final Rule in the Interconnection NOPR proceeding.

Response

As an initial matter, PJM notes that these provisions in new Tariff, Parts VII and VIII regarding additional system impact study procedures for Eligible Customers are taken, word-for-word, from provisions in the existing Tariff, Attachment D, System Impact Study Procedures. They are intended to function in the Transition Period and under the New Rules in exactly the manner in which they function presently under the existing process. PJM is simply carrying this language forward and not asking for the Commission to approve, once again, language which is unchanged from the existing Tariff.

By way of background, Tariff, Parts II and III provide that the length of firm service requested in a Long-Term Firm Transmission Service request determines how PJM will study the request. Long-Term Firm Transmission Service requests with a requested duration of five years and rollover rights must be studied along with all other New Service Requests in the interconnection process. Long-Term Firm Transmission Service requests with a requested duration of one year (or monthly requests), with the requested duration falling entirely within the 18-month Available Transfer Capability (“ATC”) horizon are evaluated by PJM Operations using posted monthly-firm ATC values. These Long-Term Firm Transmission Service requests do not require a PJM queue position and are not evaluated by Interconnection Planning.

The Long-Term Firm Transmission Service requests that are eligible for the special impact studies referenced in Question #2 are requests of less than five years’ duration (and therefore not eligible for rollover rights) that fall outside of the 18-month ATC horizon. These requests require a PJM queue position and are evaluated by Interconnection Planning. However, because the Long-Term Firm Transmission service is not eligible for rollover rights, PJM has been acting under Tariff, Part VI, Attachment D to offer Long-Term Firm customers another option for processing their request outside of PJM’s interconnection process. PJM evaluates these requests with its interim deliverability studies process, studying them by Delivery Year to determine whether sufficient transmission system capability is expected to be available to accommodate the requested Long-Term Firm Transmission Service during the specific requested Delivery Year. These studies do not identify Network Upgrades or cost responsibility for Network Upgrades; they determine only whether the requested Long-Term Firm Transmission Service is deliverable, partially deliverable, or not deliverable for the specified Delivery Year.

- 3. The proposed provisions regarding proof of site control in the Transition Cycle (Proposed Tariff, Part VII, Subpart A, section 302(A)(2)(d)) and New Rules (Proposed Tariff, Part VIII, Subpart A, section 402(A)(2)(d)) contain provisions specific to developers whose projects are to be sited on government-owned or -controlled land subject to environmental or other permitting requirements. Such developers must provide “acceptable evidence” that, for Decision Points I and III, the Project Developer is taking identifiable, acceptable steps to secure government authorization, including an estimate of when the relevant regulatory requirements will be met. For Decision Points I and III, such developers must also identify any additional property rights, for**

non-governmental land, that are needed but cannot be secured until the regulatory requirements have been met and the governmental entity provides the required authorization.

Please explain if changes to the proposed site required by the authorizing governmental entity that occur on the project side of the point of interconnection (POI) and that do not change the electric output of the project or the electrical characteristics of the project's interconnection will be considered violations of the Site Control evidentiary requirement. If so, please explain how a developer that submits an interconnection request and is subject to potential changes in site directed by an authorizing governmental entity is able to meet the proposed site control requirements. Please also explain how developers can satisfy the requirement to identify additional required property rights if they are unaware of potential changes to their proposed project site that may be directed by an authorizing governmental entity.

Response

Developers whose projects are to be sited on land physically owned or controlled by one or more government entities and subject to environmental or other permitting requirements are not subject to the standard Site Control evidentiary requirements. Instead, they are subject to a slightly different requirement, i.e., that they provide evidence that they are taking “identifiable, acceptable” steps towards securing authorization to use such land. In essence, the language recognizes that site changes that are directed by a government entity in the authorization process are acceptable. In other words, for projects being sited on government-owned or -controlled land, the requirement is that the Project Developers pursue the requisite authorization and site the project in accordance with the authorization process. The language was added to recognize that government review processes could change the acceptable site of a given project and recognize how the potential for government review processes to change the siting of a given project can also change the site location on non-government lands. This different requirement for projects to be sited on land that is physically owned or controlled by government entities was separately proposed and vetted in the stakeholder process, resulting in a specifically negotiated accommodation for projects that are to be sited on government-owned or –controlled land that was approved as an addition to the overall stakeholder solution package.

Project Developers that want more certainty than the stakeholder-vetted and approved language provides may wish to obtain the necessary land use rights before entering the interconnection process.

- 4. Under the Transition Rules and New Rules, PJM proposes site control provisions during Decision Points I and II that allow a project developer to change the project site if, among other things, the initial site and the proposed site are adjacent parcels.**

Please explain what constitutes adjacent parcels. For example, can adjacent parcels be two distinct parcels within a particular geographic area or region or do the parcels need to be contiguous? Please provide the criteria for making these determinations.

Response

PJM intends the phrase “adjacent parcels” to have its common dictionary meaning: parcels of land that are contiguous, next to each other, or sharing borders. Included within PJM’s view of “adjacent” are parcels of land that are capable of being connected through easements, so that if a Project Developer owns or has land rights to parcels of land that are near each other but separated by other parcels of land and can provide evidence that it has secured the necessary easements or land rights to bridge the intervening parcels, PJM would consider the parcels adjacent. PJM does not view the “adjacent parcels” requirement as relating to the parcels’ location in the same geographic region or political unit; for example, owning non-adjacent parcels in the same township would generally not be acceptable.

- 5. Under the Transition Rules, PJM proposes that, for projects in queue windows AE1 through AG1 that have (i) cost allocation eligibility for, or are identified as the first to cause, a Network Upgrade with total estimated costs of \$5 million or less and (ii) have not been tendered or executed an interconnection service agreement or a wholesale market participant agreement, such projects will be processed through the proposed Expedited Process.**

Please explain whether the determination of the \$5 million or less requirement includes costs to expedite construction or other similar costs.

Response

The \$5 million or less threshold represents the asset owner’s estimation, using Reasonable Efforts, of the cost of Network Upgrades that are required due to a project’s interconnection. The \$5 million figure does not include any additional costs, such as costs to advance or expedite construction or other similar costs. To be clear, the \$5 million or less threshold is simply a threshold used in the sorting mechanism that determines which projects in the AE1, AE2, AF1, AF2, and AG1 queue windows (the period from April 1, 2018, through September 30, 2020) are eligible for the Transition Period Expedited Process. The use of the word “expedited” in the description of the process for which the \$5 million or less threshold is used to determine eligibility does not mean that the Network Upgrades themselves will be expedited.

- 6. During the transition process, PJM states that applications for New Service Requests will continue to be accepted, but will not be processed until the New Rules go into effect. PJM adds that all applications submitted from October 1, 2021 through the processing of the first new cycle will comprise the first projects to proceed under the New Rules as Cycle #1. Taken together, these statements imply that Cycle #1 may be much larger than normal because it**

will be comprised of all of the New Service Requests submitted during multiple years.

Is there a risk that this could result in Cycle #1 becoming unmanageably large, and if so, how will PJM address such a risk?

Response

Yes, there is a risk that the long period over which PJM proposes to accept applications for Cycle #1 under the New Rules could result in Cycle #1 beginning as a very large group of projects. PJM notes also that it is difficult to determine the correct length of application period when PJM's past experience tells it that the majority of Project Developers will wait until the end of the period to submit their applications.

The risk of a very large group of projects in Cycle #1 is mitigated by a couple of factors. First, the rules and structures proposed in the June 14 Filing have been designed to reduce the volume of projects in the interconnection process by screening out speculative projects in the application phase and tightening requirements to remain in the interconnection process to encourage projects that are not ready to proceed to exit the interconnection process. Thus, even if Cycle #1 under the New Rules begins as a very large group of applications, it is expected that the number of projects will be winnowed down to a more manageable number of less speculative projects early in the process as a result of the proposed tariff changes.

Second, the shift from a serial queue to a clustered Cycle should make a large number of projects more manageable. The cluster/Cycle approach means PJM will be performing a single System Impact Study of all requests remaining in the process at each phase, rather than performing one or more separate studies for each project in the queue in serial fashion. The June 14 Filing also proposes to manage the volume of projects and number of studies to be performed in the interconnection process by restricting Project Developers' opportunities to modify projects, requiring Project Developers to make their decisions on whether to proceed in the process or withdraw at consistent times, and "gating" subsequent request Cycles (i.e., later Cycles cannot proceed until earlier Cycles have reached certain late stages) to maintain focus on the earliest submitted projects.

7. Order No. 2006 adopted a 10 kW Inverter Process and a Fast Track Process, the latter of which was revised in Order No. 792. PJM proposes to consolidate interconnection procedures for both small and large generators. However, PJM's proposal does not include either a 10 kW Inverter Process or a Fast Track Process. Please explain why it is just and reasonable for PJM's generator interconnection procedures to exclude these processes.

Response

The June 14 Filing includes the referenced processes but not explicitly. The June 14 Filing proposes a process of three phases with three Decision Points. The Decision Points are not just points at which Project Developers decide whether to proceed in the

interconnection process or withdraw their projects; they are also points at which certain “off ramps” from the process exist, by which a project that does not contribute to the need for any network upgrades and does not require any subsequent studies may advance to the interconnection-related agreement stage without going through the rest of the process with the other projects in the Cycle.¹⁶ Smaller sized projects are much less likely to require upgrades, and thus have a higher chance of being able to accelerate to a final interconnection-related agreement. Thus, PJM’s proposal meets the intent of Order Nos. 2006¹⁷ and 792¹⁸ by providing projects that would qualify for the specified processes established by Order Nos. 2006 and 792 with opportunities to accelerate their progress through the interconnection process¹⁹ and does so without creating a separate process with a separate administrative burden, which often simply causes confusion on the part of the applicants and transmission owners. The elimination of specific, separate processes with their own separate timing and forms of application is consistent with the design of the June 14 Filing of limiting the number of process interruptions and digressions in order to cut down on delays and will result in more efficient and equitable processing of interconnection requests, to the benefit of all interconnection customers in a Cycle.

In addition, to the extent there is a need for a 10 kW Inverter Process or a Fast Track Process²⁰ that is not being met by the Cycle process under the New Rules, because such projects are very often, if not exclusively, connected to the distribution system, they will not be subject to PJM’s interconnection procedures but can avail themselves of the Order

¹⁶ June 14 Filing at 28; *id.* at 34 n.102 (“Based on the results of the Phase I or Phase II System Impact Study, PJM may be able to accelerate the treatment of a New Service Request such that the Project Developer or Eligible Customer can enter into a final GIA or other agreement under Tariff, Part IX, without undergoing further studies.”); proposed Tariff, Part VII, Subpart D, sections 309(A)(2) and 311(A)(2)(d) and proposed Tariff, Part VIII, Subpart C, sections 406(A)(1) and 408(A)(1)(d).

¹⁷ *Standardization of Small Generator Interconnection Agreements and Procedures*, Order No. 2006, 111 FERC ¶ 61,220, *order on reh’g*, Order No. 2006-A, 113 FERC ¶ 61,195 (2005), *order on clarification*, Order No. 2006-B, 116 FERC ¶ 61,046 (2006).

¹⁸ *Small Generator Interconnection Agreements and Procedures*, Order No. 792, 145 FERC ¶ 61,159 (2013), *order on clarification*, Order No. 792-A, 146 FERC ¶ 61,214 (2014).

¹⁹ The out-of-time motion to intervene and protest filed in this docket by David O. Kuranga, Ph.D. contends that PJM is discriminating between small generators in the AG1 queue window and small generators in the AG2 queue window. *PJM Interconnection, L.L.C.*, Motion to Intervene – Out of Time Protest of David O. Kuranga, Ph.D, Docket No. ER22-2110-000, at ¶¶ 3-4 (Sept. 16, 2022) (Dr. Kuranga’s filing was dated September 15, 2022 but was filed on September 16, 2022). This claim mistakes the cut off for Transition Period eligibility, which applies by date and regardless of the size of the projects, with discrimination among small generators. The cut off date provided in the June 14 Filing was the option supported by stakeholders.

²⁰ PJM questions whether these special processes are necessary in the PJM region. Over the history of PJM’s interconnection queue PJM has received over 7,800 generator interconnection requests. In comparison, PJM has only ever received twenty applications for the 10 kW Inverter Process (0.3 percent of the generator interconnection requests), all of which ultimately were withdrawn, and has only ever received 261 applications for the Fast Track Process (three percent of the generator interconnection requests), of which 152 have been withdrawn and only 16 have been completed and put into service. Further, most of the 10 kW Inverter Process requests and Fast Track requests should have been directed to the distribution provider rather than to PJM.

No. 2222 process.²¹ Thus, small generator projects have ample avenues by which to proceed.

III. 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,²² PJM will post a copy of this filing to the FERC filings section on its internet site, <https://pjm.com/library/filing-order>, and will send an email on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region,²³ 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 twenty-four hours of the filing.

²¹ *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Order No. 2222, 172 FERC ¶ 61,247, at PP 90, 96 (2020) (Commission declining to exercise jurisdiction over the interconnection of distributed energy resources to distribution facilities for the purpose of participating in RTO/ISO markets exclusively as part of a distributed energy resource aggregation, and stating that it will not require standard interconnection procedures to apply to such interconnections), *order on reh'g & clarification*, Order No. 2222-A, 174 FERC ¶ 61,197, *order on reh'g & clarification*, Order No. 2222-B, 175 FERC ¶ 61,227 (2021).

²² *See id.* §§ 35.2(e) and 385.2010(f)(3).

²³ PJM already maintains, updates, and regularly uses email lists for all PJM Members and affected state commissions.

IV. CONCLUSION

As directed, a copy of this filing will be electronically delivered to Natalie Propst. Please contact any of the undersigned if you require additional information.

Respectfully submitted,

Craig Glazer
Vice President–Federal Government Policy
PJM Interconnection, L.L.C.
1200 G Street, N.W., Suite 600
Washington, DC 20005
(202) 423-4743 (phone)
craig.glazer@pjm.com

Jeanine S. Watson
Assistant General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403
(610) 666-4438
Jeanine.Watson@pjm.com

/s/ Wendy B. Warren
Wendy B. Warren
David S. Berman
Elizabeth P. Trinkle
Abraham F. Johns III
Wright & Talisman, P.C.
1200 G Street, NW, Suite 600
Washington, DC 20005-3898
202-393-1200 (phone)
202-393-1240 (fax)
warren@wrightlaw.com
berman@wrightlaw.com
trinkle@wrightlaw.com
johns@wrightlaw.com

**Attorneys for
PJM Interconnection, L.L.C.**

cc: Natalie Propst

CERTIFICATE OF SERVICE

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

Dated at Washington, D.C., this 29th day of September 2022.

/s/ David S. Berman

David S. Berman