



PJM Interconnection, L.L.C.
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October 8, 2019

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. ER19-469-000*
Notice of Intent in Absence of Commission Action on Order No. 841 Compliance Filing

Dear Secretary Bose,

On December 3, 2018, as amended on May 1, 2019, PJM Interconnection, L.L.C. (“PJM”) submitted revisions to the PJM Open Access Transmission Tariff (“Tariff”) and the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. (“Operating Agreement”) in the above-captioned proceeding, in compliance with the directives of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Order No. 841.¹ In that order, the Commission required each Regional Transmission Organization and Independent System Operator (“RTO/ISO”) to file tariff changes needed to implement the Commission’s directives “within 270 days of the publication date of this Final Rule in the Federal Register,” and stated that it would “allow each RTO/ISO a further 365 days from that date to implement the tariff provisions.”² For

¹ *PJM Interconnection, L.L.C.*, Order No. 841 Compliance Filing of PJM Interconnection, L.L.C., Docket No. ER19-469-000 (Dec. 3, 2018); *PJM Interconnection, L.L.C.*, Response to Request for Additional Information of PJM Interconnection, L.L.C., Docket No. ER19-469-000 (May 1, 2019); *Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators*, 162 FERC ¶ 61,127 (2018) (“Order No. 841”). Note that PJM’s compliance filing in this proceeding (Docket No. ER19-469-000) is separate and distinct from a smaller component of its Order No. 841 compliance proposal—called the “ESR Accounting Proposal”—which was filed in Docket No. ER19-462-000 and was accepted via letter order on February 1, 2019, effective February 3, 2019. *See PJM Interconnection, L.L.C.*, 166 FERC ¶ 61,087 (2019).

² Order No. 841 at P 343.

PJM specifically, the corresponding implementation date under this schedule is December 3, 2019 (365 days after PJM's December 3, 2018 compliance filing in this proceeding).

As of the date of this correspondence, the Commission has not yet acted on PJM's compliance filing in this proceeding. In an effort to comply with the Commission's implementation schedule as outlined in Order No. 841, and to simultaneously refrain from implementing Tariff and Operating Agreement revisions that the Commission has not yet acted on, PJM is writing to inform the Commission of its intent to continue with all necessary preparatory work in anticipation of December 3, 2019. However, if the Commission does not act on PJM's compliance filing in this proceeding prior to December 3, 2019, PJM will not activate its Energy Storage Resource participation model on December 3, 2019, and will refrain from doing so going forward absent further Commission action and/or guidance.

To the extent that the Commission intends for PJM to activate the participation model on December 3, 2019, PJM respectfully requests that the Commission issue an order accepting the proposed Tariff and Operating Agreement revisions at least one month prior—by no later than November 3, 2019. This will provide PJM and its stakeholders with sufficient notice to best allocate their resources in the weeks leading up to a “go live” date of December 3, 2019.³ To the extent that the Commission issues an order accepting the Tariff and Operating Agreement revisions *after* November 3, 2019, or takes some other action with respect to PJM's proposed Tariff and Operating Agreement revisions, PJM may need to seek a modified effective date for its associated tariff records, depending on the specific circumstances. Accordingly, PJM is resubmitting its tariff records in this proceeding to change the corresponding effective dates from “12/3/2019” to

³ Such resources may include “pre-launch” participant education sessions regarding technical implementation details that are most optimally deployed in the weeks leading up to the official “go live” date, whenever that may be.

“12/31/9998”⁴ to provide for this flexibility. PJM will submit an informational filing and updated tariff records with the appropriate effective date once such date is known.

I. CORRESPONDENCE AND COMMUNICATIONS

Please direct any communications regarding this filing to the following individuals:

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II. 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,⁵ 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.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 Region⁶ alerting

⁴ See, e.g., Implementation Guide for Electronic Filing of Parts 35, 154, 284, 300, and 341 Tariff Filings at 10 (Nov. 14, 2016) (“If the effective date is not known at the time of the filing, such as the effective date is contingent on FERC approval . . . the date of 12/31/9998 must be used.”).

⁵ See 18 C.F.R §§ 35.2(e) and 385.2010(f)(3).

⁶ PJM already maintains, updates, and regularly uses e-mail lists for all PJM members and affected commissions.

them that this filing has been made by PJM today 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 FERC'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. PJM also served this filing on each person designated on the official service list maintained by the Commission for this proceeding.

III. CONCLUSION

In accordance with the foregoing, PJM respectfully requests that the Commission accept this submission and associated tariff records, as discussed herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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

Dated at Audubon, PA this 8th day of October, 2019.

/s/ Thomas DeVita

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