

March 2, 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-____ 000
Order No. 676-J Compliance Revisions to Tariff, Section 4.2*

Dear Secretary Bose:

In compliance with the Federal Energy Regulatory Commission’s (“Commission”) Order No. 676-J¹ PJM Interconnection, L.L.C. (“PJM”) hereby submits modifications to the PJM Open Access Transmission Tariff (“Tariff”)² to incorporate by reference the North American Energy Standards Board (“NAESB”) Wholesale Electric Quadrant (“WEQ”) business practice standards revisions that Order No. 676-J directed public utilities to adopt in compliance filings submitted by March 2, 2022. Order No. 676-J addresses those standards separately, and defines them as the “Cybersecurity Standards,” and Parallel Flow Visualization (“PFV”) enhanced congestion management process standards (“PFV Standards”).

PJM proposes an effective date of June 2, 2022—the earliest date permitted by Order No. 676-J—for the PFV Standards and for nearly all of the Cybersecurity Standards. However, PJM is not able to implement the Cryptographic Security Modules (“CSM”) of

¹ *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-J, 175 FERC ¶ 61,139 (2021).

² For the purpose of this filing, capitalized terms not defined herein shall have the meaning as contained in the Tariff.

the Cybersecurity Standards on June 2, 2022, and the implementation date for that aspect of the Cybersecurity Standards will depend on the timing of a standards-setting body's certification of PJM's service provider, as explained in more detail below. PJM therefore proposes in this filing a placeholder effective date for incorporating by reference the CSM standards. PJM will notify the Commission when this contingency has been satisfied and will specify the actual effective date at that time.³

I. BACKGROUND

In Order No. 676-J, the Commission amended its regulations to incorporate by reference the Cybersecurity and PFV Standards contained in Version 3.3 of the WEQ NAESB Business Practice Standards ("WEQ Version 3.3 Standards").⁴

While the Commission set an October 27, 2022 deadline for compliance filings for the WEQ Version 3.3 Standards generally, the Commission directed an earlier deadline, i.e., March 2, 2022, for each public utility to submit a compliance filing to incorporate the Cybersecurity and PFV Standards into their respective Open Access Transmission Tariffs by reference.⁵

PJM accordingly submits herewith revisions to the PJM Tariff to comply with the Commission's directives in Order No. 676-J for the March 2, 2022 compliance filings.

³ PJM can provide such notice via a letter in this docket, or in the form of a compliance filing, if so directed by the Commission's order on this filing.

⁴ Order No. 676-J at P 1.

⁵ *Id.* at PP 42, 49, 50.

II. COMPLIANCE REVISIONS TO PJM TARIFF TO INCORPORATE STANDARDS

Pursuant to the Commission's directive in Order No. 676-J, PJM submits amendments to section 4.2 of the PJM Tariff to incorporate, by reference, the Cybersecurity and PFV Standards contained in the Business Practice Standards approved by the Commission in Order No. 676-J.

Specifically, PJM incorporates by reference the Cybersecurity Standards, which align public utility cybersecurity protocols and encryption methodologies to current best practices in the industry. The Cybersecurity Standards include best practices concerning: (i) intrusion detection, prevention and firewalls; (ii) ensuring applications have protection against common industry vulnerabilities; (iii) the timing of implementing software patches and updates; and (iv) performing periodic vulnerability scans, penetration testing and business continuity and disaster recovery exercises.⁶ PJM is also incorporating by reference, but on a deferred schedule, the CSM Standards that were developed to conform with the National Institute of Standards and Technology ("NIST") Federal Information Processing Standards Publication 140-3 ("NIST FIPS PUB 140-3").⁷ PJM's implementation of the CSM standards is contingent on the NIST completing certification testing of PJM's relevant information technology service provider on the new FIPS PUB 140-3 standard. While PJM and its service provider, i.e. F5, Inc. are committed to implementing the CSM as soon as is practicable, F5, Inc. is not presently able to provide a timeline for this certification, which depends on NIST's timing. Because the

⁶ *Standards for Business Practices and Communication Protocols for Public Utilities*, Report of the North American Energy Standards Board, Docket No. RM05-5-000, at 7-8 (Mar. 30, 2020).

⁷ *Id.* at 7.

implementation date for the CSM component of the Cybersecurity Standards is presently uncertain, PJM proposes a separate effective date for the CSM, as described below.

The PFV Standards modified the Eastern Interconnection Business Practice Standards to finalize standards that aid the PFV enhanced congestion management process. Under these revised standards, the market flows and network and native load calculations are substituted with the Generation-to-Load impact, which calculates energy flows on a flowgate and assigns relief obligations during a Transmission Loading Relief event based on real-time data reported by the relevant Balancing Authorities under the Generator Prioritization Method. The expanded e-Tagging requirements in the Tag Secondary Network Transmission Service Method assigns relief obligations through curtailments.⁸

Under the new PFV Standards, a Balancing Authority is now required to choose either the Tag Secondary Network Transmission Service Method or Generator Prioritization Method for assigning curtailment priorities. PJM is selecting the Generator Prioritization Method and will be providing notification of that election through the NAESB BPS WEQ 001-13 Standardized Information section of its OASIS website.

III. EFFECTIVE DATE

PJM proposes two successive revised versions of Tariff, section 4.2, with differing effective dates, to reflect the uncertainty around the CSM implementation date.

The first revised version of section 4.2 incorporates by reference all PFV Standards, and all Cybersecurity Standards except the CSM, with a proposed effective date of June 2, 2022, which is the earliest effective date permitted by Order No. 676-J. PJM notes that it

⁸ *Id.* at 13.

is separately filing revisions to the Congestion Management Process of the PJM-MISO Joint Operating Agreement⁹ to comply with the PFV Standards, and is proposing the same effective date, June 2, 2022, for those CMP changes. More precisely, for coordination purposes, PJM and MISO will implement the identical revisions to their separately filed (but identical) versions of the CMP at 11:00 a.m. EDT on June 2, 2022.

The second revised version of Tariff, section 4.2 incorporates by reference all PFV Standards and all Cybersecurity Standards (without excluding the CSM). Because the CSM implementation date is uncertain, as explained above, PJM assigns in this filing a placeholder effective date (i.e., December 31, 9998) to that second revised version of Tariff, section 4.2, and will notify the Commission of the actual effective date once PJM has confirmed when it will be able to implement the CSM.

⁹ *Joint Operating Agreement Between the Midcontinent Independent System Operator, Inc. and PJM Interconnection, L.L.C.*, PJM Interconnection, L.L.C., Attachment 2 (Congestion Management Process) (Dec. 18, 2008), <https://www.pjm.com/directory/merged-tariffs/miso-joa.pdf>. The Joint Operating Agreement Between Midcontinent Independent System Operator, Inc. and PJM Interconnection, L.L.C. (“JOA”). The JOA is a FERC-filed rate schedule of both PJM and MISO. The JOA is designated as PJM’s Rate Schedule No. 38 and MISO’s Rate Schedule No. 5.

IV. CORRESPONDENCE AND COMMUNICATIONS

Correspondence and communications with respect to this filing should be sent to, and PJM requests the secretary include on the official service list, the following persons:

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V. DOCUMENTS ENCLOSED

PJM encloses the following:

1. This transmittal letter;
2. Attachment A – Revised Tariff (June 2, 2022 effective date), section 4.2 (redlined version); and
3. Attachment B – Revised Tariff (June 2, 2022 effective date), section 4.2 (clean version).
4. Attachment C - Revised Tariff (contingent effective date), section 4.2 (redlined version);
5. Attachment D - Revised Tariff (contingent effective date), section 4.2 (clean version).

VI. 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,¹⁰ PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <https://www.pjm.com/library/filing-order.aspx> with a specific link to the newly-filed document, 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 Region¹¹ 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.aspx> in accordance with the Commission's regulations and Order No. 714.¹²

¹⁰ See 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).

¹¹ PJM already maintains, updates, and regularly uses email lists for all PJM Members and affected state commissions.

¹² *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270 (2008), *final rule*, Order No. 714-A, 147 FERC ¶ 61,115 (2014).

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VII. CONCLUSION

For all of the foregoing reasons, PJM respectfully requests that the Commission accept the proposed revisions to Tariff, Part I, section 4.2 submitted herein, effective as proposed.

Respectfully submitted,

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

March 2, 2022

Attachment A

Revisions to the PJM Open Access Transmission Tariff

Effective June 2, 2022

(Redline Format)

4.2

Pursuant to the Commission's ~~May 20, 2021~~~~September 18, 2014~~ Final Rule, Order No. 676-JH (175 FERC ¶ 61,139)(48 FERC ¶ 61,205, 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) ~~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, 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), and the Parallel Flow Visualization Standards of WEQ Version 003.3, March 30, 2020;
- (2) 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 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) excluding Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2 and 001-106.2.5, as well as the timing requirements established in 001-23, to the extent not inconsistent with Transmission Provider's current practice, and the cybersecurity standards of WEQ Version 003.3, March 30, 2020;
- (3) 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 2.0, WEQ Version 003, 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), and the cybersecurity standards (excluding the cryptographic security module revisions to WEQ-002.5) of WEQ Version 003.3, March 30, 2020;
- (4) 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 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- (5) WEQ-004, Coordinate Interchange, WEQ Version 003, July 31, 2012 (with Final Action ratified December 28, 2012);
- (6) WEQ-005, Area Control Error (ACE) Equation Special Cases, WEQ Version 003, July 31, 2012;
- (7) WEQ-006, Manual Time Error Correction, WEQ Version 003, July 31, 2012;

- (8) WEQ-007, Inadvertent Interchange Payback, WEQ Version 003, July 31, 2012;
- (9) WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, WEQ Version 003, July 31, 2012 (with minor corrections applied November 28, 2012), and the Parallel Flow Visualization Standards of WEQ Version 003.3, March 30, 2020;
- (10) WEQ-011, Gas/Electric Coordination, WEQ Version 003, July 31, 2012;
- (11) WEQ-012, Public Key Infrastructure (PKI), WEQ Version 003, July 31, 2012 (as modified by NAESB Final Actions ratified on October 4, 2012);
- (12) WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) ;
- (13) WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, WEQ Version 003, July 31, 2012; and
- (14) WEQ-021, Measurement and Verification of Energy Efficiency Products, WEQ Version 003, July 31, 2012.

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

Effective June 2, 2022

(Clean Format)

4.2

Pursuant to the Commission's May 20, 2021 Final Rule, Order No. 676-J (175 FERC ¶ 61,139) 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) the Transmission Provider hereby incorporates by reference the following standards promulgated by the WEQ of the NAESB:

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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 C

Revisions to the PJM Open Access Transmission Tariff

Effective December 31, 9998

(Redline Format)

4.2

Pursuant to the Commission's May 20, 2021 Final Rule, Order No. 676-J (175 FERC ¶ 61,139) 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) the Transmission Provider hereby incorporates by reference the following standards promulgated by the WEQ of the NAESB:

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Attachment D

Revisions to the PJM Open Access Transmission Tariff

Effective December 31, 9998

(Clean Format)

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- (8) WEQ-007, Inadvertent Interchange Payback, WEQ Version 003, July 31, 2012;

- (9) WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, WEQ Version 003, July 31, 2012 (with minor corrections applied November 28, 2012), *and the Parallel Flow Visualization Standards of WEQ Version 003.3, March 30, 2020*;
- (10) WEQ-011, Gas/Electric Coordination, WEQ Version 003, July 31, 2012;
- (11) WEQ-012, Public Key Infrastructure (PKI), WEQ Version 003, July 31, 2012 (as modified by NAESB Final Actions ratified on October 4, 2012);
- (12) WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) ;
- (13) WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, WEQ Version 003, July 31, 2012; and
- (14) WEQ-021, Measurement and Verification of Energy Efficiency Products, WEQ Version 003, July 31, 2012.

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.