

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

March 31, 2022

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-_002

Compliance Filing and Request for Waiver of Certain NAESB Business Practice Standards

Dear Secretary Bose:

PJM Interconnection, L.L.C. submits this filing ("Compliance Filing") in compliance with the Order on Compliance and Request for Waivers, issued on March 7, 2022, by the Federal Energy Regulatory Commission ("Commission") in this proceeding ("March 7 Order"). In accordance with the March 7 Order, PJM requests a May 1, 2022, effective date for the PJM Open Access Transmission Tariff ("Tariff") revisions proposed in this Compliance Filing.

I. BACKGROUND

On July 27, 2021, and as amended on October 22, 2021,² PJM filed revisions the Tariff and a request for waivers to comply with the requirements of Order No. 676-I (the "July 27 Filing").³ In Order No. 676-I, the Commission revised its regulations to incorporate by reference Version 003.2 of the Standards for Business Practices and Communication Protocols for Public Utilities ("Business Practice Standards") adopted by the Wholesale Electric Quadrant ("WEQ")

¹ *PJM Interconnection, L.L.C.*, 178 FERC ¶ 61,163 (2022).

² On October 22, 2021, PJM submitted an amended compliance filing to correct formatting and editorial changes that were included in the Commission's errata notice issued on March 3, 2020 (*Standards for Business Practices and Communication Protocols for Public Utilities*, Errata Notice (March 3, 2020)).

³ Standards for Bus. Pracs. & Commc'n Protocols for Pub. Utils., Order No. 676-I, 85 Fed. Reg. 10,571 (Feb. 25, 2020), 170 FERC ¶ 61,062 (2020) (Order No. 676-I).

of the North American Energy Standards Board ("NAESB") as mandatory enforceable requirements.

In the March 7 Order, the Commission accepted PJM's proposed Tariff revisions, effective May 1, 2022, and granted the requested waivers, subject to an additional compliance filing being submitted within 30 days of March 7, 2022.⁴

II. DESCRIPTION OF TARIFF REVISIONS AND EFFECTIVE DATE

In the March 7 Order, the Commission directed the following to be addressed in PJM's Compliance Filing:

- 1. The Commission stated in its belief that the July 27 Filing transmittal letter erroneously included a request for waiver of Business Practice Standard WEQ-000, because it was not reflected in the proposed Tariff revisions and therefore not addressed in the March 7 Order.⁵ PJM confirms that the waiver request did not include Business Practice Standard WEQ-000.
- 2. The Commission required PJM to revise Tariff, section 4.2 to include a citation to the order granting the waiver requests.⁶
- 3. In the July 27 Filing, PJM inadvertently omitted from Tariff, section 4.2 Business Practice Standards WEQ-002-4.3.6.6.1, and WEQ-002-4.3.6.6.2 from the enumerated Business Practice Standards for which waiver was requested. Thus, the Commission

⁴ March 7 Order at PP 19-23.

⁵ March 7 Order at P 21.

⁶ March 7 Order at P 23.

directed PJM to revise section 4.2 to identity those Business Practice Standards as having waivers granted.⁷

4. The Commission noted that in its proposed Tariff revisions, PJM requested waiver of Business Practice Standard WEQ-001-15.1.2, not WEQ-001-15.11 as described in the April 27 Filing transmittal. PJM clarifies that Business Practice Standard WEQ-001-15.1.2, not WEQ-001-15.11 is the correct Business Practice Standard for which waiver has been granted. Therefore Tariff, section 4.2, as revised in the July 27 Filing is correct.

III. DESCRIPTION OF PJM TARIFF REVISIONS

PJM submits the following Tariff revisions as directed by the Commission in the March 7 Compliance filing:

- 1. Tariff, section 4.2 is revised to add to the paragraph immediately following the list of Business Practice Standards incorporated by reference "Order on Compliance and Request for Waivers, 151 FERC ¶ 61,141 (2015)" which is the citation to the order granting the waiver requests issued on May 18, 2015; and
- Tariff, section 4.2 is revised to add to the end of the forth bulleted paragraph
 "Business Practice Standards WEQ-002-4.3.6.6.1 and WEQ-002-4.3.6.6.2" following
 "excluding".

IV. EFFECTIVE DATE

Consistent with the March 7 Order, PJM requests an effective date of May 1, 2022, for the PJM Tariff revisions proposed in this Compliance Filing,

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⁷ March 7 Order at P 23.

V. 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).

VI. 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@pim.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

VII. 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, 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 region 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@pim.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

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 31st day of March, 2022.

/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)

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 <u>Business Practice Standards WEQ-002-4.3.6.6.1</u> and WEQ-002-4.3.6.6.2;
- (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; WEQ-023-5.1.3; 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) *Order on Compliance and Request for Waivers*, 151 FERC ¶ 61,141 (2015).

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)

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:

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