

May 1, 2023

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. ER23-\_\_\_\_-000  
Order No. 676-J Compliance Revisions to Tariff, Section 4.2*

Dear Secretary Bose:

PJM Interconnection, L.L.C. (“PJM”), in compliance with the Federal Energy Regulatory Commission’s (“Commission”) Order No. 676-J<sup>1</sup> hereby resubmits revisions to the PJM Open Access Transmission Tariff (“Tariff”),<sup>2</sup> section 4.2 to incorporate by reference the North American Energy Standards Board (“NAESB”) Wholesale Electric Quadrant (“WEQ”) Version 3.3 Business Practice Standards that PJM has not already incorporated by reference through its October 27, 2022 and February 1, 2023 compliance filings in Docket No. ER22-1165.<sup>3</sup> Order No. 676-J directed public utilities to file to incorporate these remaining provisions of WEQ Version 3.3 Standards twelve months after their implementation of the WEQ Version 003.2 Standards, which resulting date for PJM is May 1, 2023.<sup>4</sup> In accordance with Order No. 676-J, PJM is employing an indeterminate

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

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

<sup>3</sup> *PJM Interconnection, L.L.C.*, Order No. 676-J Compliance Revisions to Tariff, Section 4.2 of PJM Interconnection, L.L.C., Docket No. ER22-1165-001 (Oct. 27, 2022) (“October 27 Filing”), *as amended by PJM Interconnection, L.L.C.*, Order No. 676-J Compliance Revisions to Tariff, Section 4.2 of PJM Interconnection, L.L.C., Docket No. ER22-1165-002 (Feb. 1, 2023) (“February 1 Filing”).

<sup>4</sup> Order No. 676-J at P 48.

effective date for these changes, to permit the Commission to select the effective date at the time it acts on this filing.<sup>5</sup>

In the October 27 Filing, PJM submitted revisions to Tariff, section 4.2 virtually identical to those provided here<sup>6</sup> but, upon receiving Commission staff guidance on that uncontested filing, PJM submitted the February 1 Filing to amend the October 27 Filing, and facilitate the Commission's issuance of a separate and earlier order on the subset of WEQ Version 3.3 standards that were targeted for earlier implementation.

By this filing, PJM also requests continuation of waivers the Commission has previously granted as to certain of the WEQ standards.

## **I. BACKGROUND**

In Order No. 676-J, the Commission amended its regulations to incorporate by reference, as mandatory enforceable requirements, Version 3.3 of the WEQ NAESB Business Practice Standards ("WEQ Version 3.3 Standards"), which were filed with the Commission on March 30, 2020.<sup>7</sup> Order No. 676-J directed that compliance filings for the remaining WEQ Version 3.3 Standards i.e., all affected Standards other than the Cybersecurity Standards and Parallel Flow Visualization ("PFV") Standards, "will be due 12 months after implementation of the WEQ Version 003.2 Standards, or no earlier than October 27, 2022."<sup>8</sup> PJM accordingly submitted the October 27 Filing to incorporate by

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<sup>5</sup> As explained below, however, PJM is submitting two indeterminate-date versions of the revisions to Tariff, section 4.2, because PJM's ability to implement the cryptographic portion of the Standards remains subject to federal agency validation of the cryptographic module PJM plans to employ.

<sup>6</sup> See October 27 Filing at Attachments C, D, E, and F.

<sup>7</sup> Order No. 676-J at P 1.

<sup>8</sup> Order No. 676-J at P 48.

reference the remaining WEQ Versions 3.3 Standards. The Commission's order on PJM's filing on the WEQ Version 3.2 Standards set the implementation date for those Standards as May 1, 2022,<sup>9</sup> and thus set the final deadline for incorporating the remaining Version 3.3 Standards as May 1, 2023.

On March 2, 2022, PJM submitted its compliance filing<sup>10</sup> to revise Tariff, section 4.2 to incorporate by reference the Cybersecurity Standards and PFV Standards of the WEQ Version 3.3 Standards, effective June 2, 2022, except for the cryptographic security module ("CSM") of the Cybersecurity Standards, for which PJM requested an indeterminate effective date. On February 1, 2023, on Commission Staff's suggestion, PJM amended its March 2 Filing and October 27 Filing, to correct an apparent error in the Tariff revision needed to incorporate the Cybersecurity Standards and the PFV Standards, assigned an indeterminate effective date to those Tariff revisions, and withdrew the further Tariff revisions needed to comply with the remaining WEQ Version 3.3 Standards from that docket. On February 23, 2023, the Commission accepted the Tariff revisions submitted in the February 1 Filing, and granted the requested waivers.<sup>11</sup>

By today's filing, PJM resubmits (essentially as set forth in the October 27 Filing) the revisions to Tariff, section 4.2, needed to incorporate by reference the remaining WEQ Version 3.3 Standards, i.e., those Standards that were not already addressed by the March 2 Filing as amended by the February 1 Filing. PJM also seeks continuation of previously

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<sup>9</sup> *PJM Interconnection L.L.C.*, 178 FERC ¶ 61,163 (2022).

<sup>10</sup> *PJM Interconnection L.L.C.*, Order No. 676-J Compliance Revisions to Tariff, Section 4.2 of PJM Interconnection, L.L.C., Docket No. ER22-1165-000 (March 2, 2022) ("March 2 Filing").

<sup>11</sup> *PJM Interconnection L.L.C.*, 182 FERC ¶ 61,118 (2023) ("February 23 Order").

granted Commission waivers of specified requirements of the Business Practice Standards because PJM's current processes continue to be consistent with, or superior to, those requirements.

## **II. COMPLIANCE REVISIONS TO THE TARIFF TO INCORPORATE ALL REMAINING WEQ VERSION 3.3 STANDARDS**

Pursuant to the Commission's directive in Order No. 676-J, PJM submits amendments to Tariff, section 4.2 to incorporate, by reference, all remaining WEQ Version 3.3 Standards.

Specifically, PJM is revising Tariff, section 4.2 to incorporate by reference the WEQ Version 3.3 Standards, which include modifications, reservations, and/or additions to the following set of existing Standards:

### **WEQ Business Practice Standards**

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| 000 | Abbreviations, Acronyms, and Definition of Terms                                |
| 001 | Open Access Same-Time Information System (OASIS)                                |
| 002 | OASIS Standards and Communication Protocols (S&CP)                              |
| 003 | OASIS S&CP Data Dictionaries  |
| 004 | Coordinate Interchange  |
| 005 | Area Control Error  |
| 007 | Inadvertent Interchange Payback   |
| 008 | Transmission Loading Relief—Eastern Interconnection Business Practice Standards |
| 011 | Gas/Electric Coordination   |
| 012 | Public Key Infrastructure   |
| 013 | OASIS Implementation Guide  |
| 015 | Measurement and Verification of Wholesale Electricity Demand Response           |
| 021 | Measurement and Verification of Energy Efficiency Products                      |
| 022 | Electric Industry Registry  |
| 023 | Modeling  |

Because this compliance filing completes PJM's incorporation of the WEQ Version 3.3 Standards, PJM is revising Tariff, section 4.2 to the noted WEQ Standard categories so that each existing reference to an earlier WEQ Version in a WEQ Standards category that has been modified by the WEQ Version 3.3 Standards is replaced with a reference to "[WEQ] Version 003 (March 30, 2020)." PJM is also removing references in Tariff, section 4.2, that limited implementation of the WEQ Version 3.3 Standards to only the Cybersecurity Standards and/or PFV Standards in the March 2 Filing.

There is one exception to PJM's proposed implementation of all remaining WEQ Version 3.3 Standards on the date the Commission will generally set as the implementation date for such standards. PJM is not yet in a position to commit to implementing the CSM portion of the Cybersecurity Standards, because PJM's implementation is subject to validation by the National Institute of Standards and Technology ("NIST") Cryptographic Module Validation Program ("CMVP") of the cryptographic module that will be provided by F5, the specialized technology company PJM has contracted to provide this service. So far as PJM is aware, there is no issue specific to PJM, F5, or F5's cryptographic module. Rather, the issue appears to be a "significant backlog" noted by NIST CMVP<sup>12</sup> in accomplishing validations of cryptographic modules under the recently updated Federal Information Processing Standard ("FIPS") 140-3 for such validation.<sup>13</sup> Given the

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<sup>12</sup> See *Cryptographic Module Validation Program*, National Institute of Standards and Technology, <https://csrc.nist.gov/projects/cryptographic-module-validation-program> (last visited April 27, 2023) ("CMVP is experiencing a significant backlog in the validation process.").

<sup>13</sup> A recent search using the search tool on the NIST CMVP website indicates that there currently are only seven cryptographic modules that have obtained an "active" (i.e., approved) validation status under FIPS 140-3. See *Cryptographic Module Validation Program*, National Institute of Standards and Technology, <https://csrc.nist.gov/projects/cryptographic-module-validation-program/validated->

uncertainty on when the module will be validated, PJM is providing a version of the compliance revisions to Tariff, section 4.2 that excludes compliance with the CSM Standards, and a second version, which includes compliance with such Standard.

### **III. REQUEST FOR CONTINUED WAIVERS OF SPECIFIED WEQ STANDARDS**

In the order on compliance<sup>14</sup> on PJM's filing<sup>15</sup> to comply with Order No. 676-I,<sup>16</sup> the Commission granted PJM:

- continued waivers of specified standards related to Service Across Multiple Transmission Systems ("SAMTS") in WEQ-001;<sup>17</sup>
- continued waivers of specified WEQ Version 003 Business Practice Standards related to Network Integration Transmission Service ("NITS") within WEQ-000, WEQ-001, WEQ-002, and WEQ-003, which are designed to support the OASIS functionality associated with NITS;<sup>18</sup> and
- waiver of certain WEQ-001 and WEQ-002 standards of the WEQ Version 003 Business Practice Standards related to firm transmission service customers' right of preemption and right of first refusal ("ROFR").<sup>19</sup>

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modules/search?SearchMode=Advanced&Standard=140-3&CertificateStatus=Active&ValidationYear=0 (last visited Apr. 27, 2023).

<sup>14</sup> *PJM Interconnection, L.L.C.*, 178 FERC ¶ 61,163 (2022) ("676-I Compliance Order").

<sup>15</sup> *PJM Interconnection, L.L.C.*, Compliance Filing and Request for Waiver of Certain NAESB Business Practice Standards, Docket No. ER21-2524-000 (July 27, 2021) ("676-I Compliance Filing"), as amended October 22, 2021.

<sup>16</sup> *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-I, 170 FERC ¶ 61,062 (2020).

<sup>17</sup> 676-I Compliance Order at P 20.

<sup>18</sup> *Id.* at P 21.

<sup>19</sup> *Id.* at P 22.

The Commission re-approved each of these waivers in the February 23 Order.<sup>20</sup>

PJM requests that the Commission grant PJM continuation of each of these waivers. PJM's practices in each of these cases continue to meet the intent of the standards. PJM has maintained the previously accepted language in proposed Tariff, section 4.2 to reflect continuation of each of these requested waivers.

**A. Waiver of WEQ-001 Standards Related to Service Across Multiple Transmission Systems**

In its 2015 order<sup>21</sup> on PJM's filing<sup>22</sup> to comply with Order No. 676-H,<sup>23</sup> the Commission granted PJM's requested waivers related to the SAMTS standards.<sup>24</sup>

The SAMTS Business Practice Standards were developed to provide a process for customers to complete cross-regional transactions and included modifications to WEQ-000, WEQ-001, WEQ-002, WEQ-003, and WEQ-013, which collectively were designed to address the coordination of point-to-point transmission service and/or network transmission service requests across multiple transmission systems.<sup>25</sup> Recognizing the benefit to customers of a consistent approach across transmission providers, PJM proposed to implement the intent of SAMTS essentially as prescribed in the Business Practice

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<sup>20</sup> February 23 Order at P 14. In an apparent oversight, the February 23 Order did not include WEQ-003 in its list of standards affected by the NITS waiver.

<sup>21</sup> *PJM Interconnection, L.L.C.*, 151 FERC ¶ 61,141, at P 8 (2015) ("676-H Compliance Order").

<sup>22</sup> *PJM Interconnection, L.L.C.*, Compliance Filing and Request for Waiver, Docket No. ER15-527-000 (Dec. 1, 2014) ("676-H Compliance Filing"), as amended April 10, 2015.

<sup>23</sup> *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-H, 148 FERC ¶ 61,205, *modified by*, 149 FERC ¶ 61,014 (2014), *order on reh'g*, 151 FERC ¶ 61,046 (2015).

<sup>24</sup> 676-H Compliance Order at P 18.

<sup>25</sup> *Id.* at P 9.

Standards, but with minor exceptions intended to address, in part, the adverse effect on the timeline to evaluate short-term transmission service requests.<sup>26</sup>

In its filing to comply with Order No. 676-H, PJM explained that, because of PJM's automated approval process, the 24-hour period established by the SAMTS Business Practice Standards could hinder PJM's ability to timely evaluate requests for transmission service.<sup>27</sup> To eliminate this impact, PJM proposed to evaluate SAMTS transactions without delay using an approach that is consistent with PJM's processes and procedures and also closely aligned with the adopted SAMTS evaluation process.<sup>28</sup> PJM explained that its approach results in an added benefit to customers, permitting them to receive automated transaction evaluation that allows them to make business decisions without paying for service that could not be secured on another transmission system.<sup>29</sup> PJM advised that, by contrast, the standards addressing SAMTS in WEQ-001 could cause delays in evaluating transmission service requests with no discernable benefit to customers.<sup>30</sup>

In the 676-H Compliance Order, the Commission granted the requested waivers, finding that PJM's processes and procedures are closely aligned with the adopted SAMTS evaluation process.<sup>31</sup>

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<sup>26</sup> *Id.*

<sup>27</sup> *See* 676-H Compliance Filing at 3-4.

<sup>28</sup> *Id.* at 4.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> 676-H Compliance Order at P 18.



PJM requested continuation of the same waivers of the specified SAMTS-related standards in the 676-I Compliance Filing.<sup>32</sup> The Commission granted the requested continuation of waivers in the 676-I Compliance Order, noting PJM's explanation that the SAMTS standards, as adopted, may cause delays in evaluating transmission service requests with no discernable benefit to customers, and finding that PJM's processes and procedures are closely aligned with the adopted SAMTS evaluation process.<sup>33</sup> Most recently, PJM requested continuation of the same waivers in the February 1 Filing<sup>34</sup> and the Commission granted the requested continuation of the waivers in the February 23 Order.<sup>35</sup>

PJM requests a continued waiver of the SAMTS-related standards in the WEQ Version 3.3 Standards because the circumstances that initially warranted the waivers continue to exist and nothing has changed in the interim to eliminate the need for waiver. PJM proposes to continue to implement the intent of SAMTS essentially as prescribed in the Business Practice Standards, but with minor exceptions intended to address, in part, the adverse effect on the timeline to evaluate short-term transmission service requests. Without the continued waiver of the standards addressing SAMTS in WEQ-001, PJM may experience considerable delay in evaluating transmission service requests with no discernable benefit to customers. Accordingly, PJM requests continuation of the waivers

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<sup>32</sup> 676-I Compliance Filing at 4.

<sup>33</sup> 676-I Compliance Order at P 20.

<sup>34</sup> February 1 Filing at 5-6.

<sup>35</sup> February 23 Order at 14.

of the SAMTS-related standards so as to allow PJM to incorporate by reference WEQ-001 excluding standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.11, and 001-106.2.5, as well as the timing requirements established in 001-23, to the extent inconsistent with PJM's current practice.

**B. Waiver of WEQ-000, WEQ-001, WEQ-002, and WEQ-003 Standards Related to Network Integration Transmission Service**

In the 676-H Compliance Order, the Commission also granted PJM waivers of the WEQ Version 003 Business Practice Standards related to NITS within WEQ-000, WEQ-001, WEQ-002, and WEQ-003.<sup>36</sup> In the 676-H Compliance Filing, PJM explained that its Commission-approved Regional Transmission Expansion Plan, its capacity market model, and its wholesale energy market processes govern both the study and commitment of internal and external network resources and load designations as contemplated in the NITS Business Practice Standards in an open and nondiscriminatory manner.<sup>37</sup> PJM further explained that its practices relative to NITS adhere to the principles established in the Order No. 890<sup>38</sup> series of orders and the NITS Business Practice Standards adopted in Order No. 676-H.<sup>39</sup> PJM also explained that, while the exact methods of posting and evaluating the designation and un-designation of network resources and loads may not match the exact

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<sup>36</sup> 676-H Compliance Order at P 12.

<sup>37</sup> 676-H Compliance Filing at 4.

<sup>38</sup> *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, 118 FERC ¶ 61,119, *order on reh'g*, Order No. 890-A, 121 FERC ¶ 61,297 (2007), *order on reh'g & clarification*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g & clarification*, Order No. 890-C, 126 FERC ¶ 61,228, *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009).

<sup>39</sup> 676-H Compliance Filing at 5.

requirements of WEQ Version 003 Business Practice Standards, PJM rules and requirements meet, and even exceed, the intent of those requirements.<sup>40</sup>

In the 676-H Compliance Order, the Commission granted the NITS-related waivers proposed by PJM, finding that PJM's method for posting and evaluating the designation/un-designation of network resources and load meets the intent of the WEQ Version 003 Business Practice Standards.<sup>41</sup> The Commission also found that, through the provisions relating to the integration and dispatch of network resources that are part of PJM's overall approved Tariff and market design, PJM demonstrated good cause for waiver of the adopted WEQ Version 003 Business Practice Standards.<sup>42</sup>

In the 676-I Compliance Filing, PJM requested,<sup>43</sup> and in the 676-I Compliance Order the Commission granted, continued waivers of the NITS-related standards.<sup>44</sup> The Commission found that "PJM has a method in place for posting and evaluating the designation/un-designation of network resources and load that meets the intent of the Version 003.2 Business Practice Standards" and that "through the provisions relating to the integration and dispatch of network resources that are part of PJM's overall approved OATT and market design, PJM has shown good cause for waiver" of the specified NITS-related standards.<sup>45</sup> Most recently, PJM requested continued waivers of the NITS-related

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<sup>40</sup> *Id.* at 5-6.

<sup>41</sup> 676-H Compliance Order at P 19.

<sup>42</sup> *Id.*

<sup>43</sup> 676-I Compliance Filing at 6-7.

<sup>44</sup> 676-I Compliance Order at P 21.

<sup>45</sup> *Id.*

standards in the February 1 Filing<sup>46</sup> and the Commission granted the waiver in the February 23 Order.<sup>47</sup>

PJM requests a continued waiver of the NITS-related standards in the WEQ Version 3.3 Standards because the circumstances that initially warranted the waivers continue to exist and nothing has changed in the interim to eliminate the need for waiver. PJM's Commission-approved Regional Transmission Expansion Plan, its capacity market model, and its wholesale energy market processes govern both the study and commitment of internal and external network resources and load designations as contemplated in the NITS Business Practice Standards in an open and nondiscriminatory manner. Therefore, PJM continues to have a method in place for posting and evaluating the designation and un-designation of network resources and load that continues to meet the intent of the Business Practice Standards. The PJM planning process and capacity procurement methods, taken together, analyze the network resources and load requirements for PJM on an ongoing, regional basis rather than evaluating specific resources to a specific load. PJM maintains that the designation and un-designation of network resources and load are done utilizing PJM's Capacity Exchange application and associated PJM capacity and market rules, rather than utilizing OASIS templates. Therefore, good cause exists for the continued waiver of the WEQ Version 3.3 Standards related to NITS within WEQ-000, WEQ-001, WEQ-002, and WEQ-003.

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<sup>46</sup> February 1 Filing at 5-6.

<sup>47</sup> February 23 Order at 14.

**C. Waiver of Standards Related to Transmission Customer Rights of Preemption and Rights of First Refusal**

In the 676-I Compliance Filing, PJM requested waivers of the WEQ Version 003 Business Practice Standards related to preemption and the ROFR, specifically, Business Practice Standards WEQ-001-25, WEQ-002-4.3.6.6.1, and WEQ-002-4.3.6.6.2.<sup>48</sup> The Commission granted those requested waivers.<sup>49</sup>

The WEQ Version 003.2 Business Practice Standards included revisions to the OASIS suite of Business Practice Standards to support directives in Order Nos. 888<sup>50</sup> and 890. In the 676-I Compliance Filing, PJM explained that the Commission previously granted PJM's requests for variations from the preemption rules in section 13.2 of the pro forma open access transmission tariff.<sup>51</sup> PJM explained that these variations of the PJM Tariff added procedures for customers to obtain short-term, firm point-to-point transmission service, with a reservation window, and offered short-term point-to-point transmission service on a first-come, first-served basis without preemption rights.<sup>52</sup> As PJM explained, the variations also assist PJM in the orderly processing of high volumes of

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<sup>48</sup> 676-I Compliance Filing at 11.

<sup>49</sup> 676-I Compliance Order at P 22.

<sup>50</sup> *Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities*, Order No. 888, 75 FERC ¶ 61,080, 1991–1996 FERC Stats. & Regs., Regs. Preambles ¶ 31,036 (1996), *order on reh'g*, Order No. 888-A, 78 FERC ¶ 61,220, 1996–2000 FERC Stats. & Regs., Regs. Preambles ¶ 31,048, *order on reh'g*, Order No. 888-B, 81 FERC ¶ 61,248 (1997), *reh'g denied*, Order No. 888-C, 82 FERC ¶ 61,046 (1998), *aff'd in part & remanded in part sub nom. Transmission Access Policy Study Group v. FERC*, 225 F.3d 667 (D.C. Cir. 2000), *aff'd sub nom. New York v. FERC*, 535 U.S. 1 (2002).

<sup>51</sup> 676-I Compliance Filing at 9 (citing *PJM Interconnection, L.L.C.*, 123 FERC ¶ 61,145, at P 14 (2008)); the previously accepted variations are variations granted by the Commission in Tariff, sections 13.1, 13.2, 17.1, and 17.8.

<sup>52</sup> 676-I Compliance Filing at 10.

transactions on the PJM transmission system.<sup>53</sup> In particular, as PJM explained, the WEQ Version 003.2 Business Practice Standards related to preemption and ROFR were developed to improve upon existing business practices governing the preemption of transmission service by competing requests, but those standards went beyond what is needed on the PJM system insofar as they dictate the mechanical steps PJM's OASIS must follow to process a preemption-ROFR event.<sup>54</sup>

PJM explained that it employs existing software automation and proposed to implement the intent of the preemption-ROFR process as prescribed in the standards, but that certain of those standards (i.e., WEQ-001-25, WEQ-002-4.3.6.6.1, and WEQ-002-4.3.6.6.2) would impact PJM's ability to continue using that software and related internal procedures.<sup>55</sup> The requested waivers, PJM explained, would therefore allow PJM to continue utilizing practices that are superior to or consistent with the WEQ Version 003.2 Business Practice Standards related to preemption and ROFR, while still providing the benefits of the preemption-ROFR process business practices and an identical outcome for transmission customers.<sup>56</sup>

In the 676-I Compliance Order, the Commission granted PJM's requested waiver of the specified standards related to preemption and the ROFR.<sup>57</sup> The Commission found that the modifications effected by the proposed waivers "implement[] the intent of the

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<sup>53</sup> *Id.*

<sup>54</sup> 676-I Compliance Filing at 12.

<sup>55</sup> *Id.*

<sup>56</sup> *Id.*

<sup>57</sup> 676-I Compliance Order at P 22.

preemption-ROFR process” as prescribed in the standards, and that “these proposed modifications are consistent with or superior to the WEQ Version 003.2 Business Practice Standards related to preemption and ROFR.”<sup>58</sup> The Commission further found that PJM’s proposed implementation of the standards, with the requested waivers, “still provide the benefits of the Business Practice Standards,” including “ensuring that the preemption-ROFR process is completed instantaneously without participants needing to wait for a potentially lengthy competition process to conclude;” and “implementing a process that is, in all meaningful respects, consistent with the WEQ Version 003.2 Business Practice Standards related to preemption and ROFR.”<sup>59</sup>

Most recently, the Commission granted these waivers in the February 23 Order.<sup>60</sup> The same circumstances that supported the Commission’s grant of these waivers in March 2022 and the February 23 Order continue to exist today. PJM accordingly requests a continued waiver of the preemption and ROFR-related standards in the WEQ Version 3.3 Standards.

In particular, due to PJM’s transmission service request volume being overwhelmingly comprised of hourly and daily requests granted close to the service start time, PJM proposes to continue to evaluate preemption-ROFR transactions without delay in accordance with the previously accepted variations and waivers granted by the Commission. It remains the case that implementing the preemption and ROFR standards

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<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

<sup>60</sup> February 23 Order at 14.

in WEQ Version 3.3 Standards without the requested waivers would harm market participants' ability to participate in the PJM day-ahead and real-time energy market. Absent the proposed specific waivers, the preemption and ROFR standards in WEQ Version 3.3 Standards would negate the benefits of the previously approved variations from the pro forma open access transmission tariff by allowing short-term reservations to be preempted by a later reservation. Therefore, good cause exists for the continued waiver of the preemption and ROFR-related Business Practice Standards WEQ-001-25, WEQ-002-4.3.6.6.1, and WEQ-002-4.3.6.6.2.

#### **IV. EFFECTIVE DATE**

PJM proposes an indeterminate effective date, for both versions (as discussed above) of the revisions to Tariff, section 4.2 needed to incorporate by reference all remaining NAESB WEQ Version 3.3 Standards.



**V. 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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**VI. DOCUMENTS ENCLOSED**

PJM encloses the following:

1. This transmittal letter;
2. Attachment A – Revised Tariff (indeterminate effective date), section 4.2 (excluding CSM Standards compliance) (redlined version);
3. Attachment B – Revised Tariff (indeterminate effective date), section 4.2 (excluding CSM Standards compliance) (clean version);
4. Attachment C – Revised Tariff (indeterminate effective date), section 4.2 (including CSM Standards compliance) (redlined version); and
5. Attachment D – Revised Tariff (indeterminate effective date), section 4.2 (including CSM Standards compliance) (clean version).

## **VII. 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,<sup>61</sup> PJM will post a copy of this filing to the 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 Region<sup>62</sup> 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.<sup>63</sup>

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<sup>61</sup> See 18 C.F.R. §§ 35.2(e) & 385.2010(f)(3).

<sup>62</sup> PJM already maintains, updates, and regularly uses email lists for all PJM Members and affected state commissions.

<sup>63</sup> *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270 (2008), *final rule*, Order No. 714-A, 147 FERC ¶ 61,115 (2014).

## VIII. CONCLUSION

For all of the foregoing reasons, PJM respectfully requests that the Commission accept the proposed revisions to Tariff, section 4.2 submitted herein, effective as proposed, and grant continuation of the waivers previously granted (including as recently as February 23, 2023) for the reasons set forth above.

Respectfully submitted,

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May 1, 2023

# Attachment A

## Revisions to the PJM Open Access Transmission Tariff

Effective December 31, 9998  
(excluding CSM Standards compliance)

(Redline Format)

## 4.2

Pursuant to the Commission's May 21, 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), in *PJM Interconnection, L.L.C.*, 178 FERC ¶ 61,163 (March 7, 2022), in *PJM Interconnection, L.L.C.*, 182 FERC ¶ 61,118 (Feb. 23, 2023), and in response to PJM's compliance filings for Order No. 676-J, 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 003.23, ~~Dec. 8, 2017~~ March 30, 2020) ~~(with minor correction applied July 23, 2019), and [WEQ] Version 003.3, March 30, 2020, but only as to the cybersecurity standards and the parallel flow visualization standards;~~
- (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 003.23, March 30, 2020 ~~Dec. 8, 2017~~); ~~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, 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, and including incorporation by reference of [WEQ] Version 003.3, March 30, 2020 but only as to the cybersecurity standards;~~
- (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 003.23, March 30, 2020 ~~Dec. 8, 2017~~), excluding, however, the cryptographic security module of the cybersecurity standards, and excluding Business Practice Standards WEQ-002-4.3.6.6.1 and WEQ-002-4.3.6.6.2, ~~and including incorporation by reference of [WEQ] Version 003.3, March 30, 2020, but only as to the cybersecurity standards;~~
- (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 003.23, March 30, 2020 ~~Dec. 8, 2017~~) ~~(with minor corrections applied Jul. 23, 2019);~~

- (6) WEQ-004, Coordinate Interchange ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~);
- (7) WEQ-005, Area Control Error (ACE) Equation Special Cases ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~);
- (8) WEQ-006, Manual Time Error Correction ([WEQ] Version 003.1, Sept. 30, 2015);
- (9) WEQ-007, Inadvertent Interchange Payback ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~);
- (10) WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~), ~~and [WEQ] Version 003.3, March 30, 2020, but only as to the parallel flow visualization standards;~~
- (11) WEQ-011, Gas/Electric Coordination, ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~);
- (12) WEQ-012, Public Key Infrastructure (PKI) ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~);
- (13) WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, [OASIS] ~~Version 2.2~~ ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~);
- (14) WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~);
- (15) WEQ-021, Measurement and Verification of Energy Efficiency Products ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~);
- (16) WEQ-022, Electric Industry Registry ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~Dec. 8, 2017~~); and
- (17) WEQ-023, Modeling- ([WEQ] Version 003.~~23~~, ~~March 30, 2020~~~~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), *Order on Compliance and Request for Waivers*, 178 FERC ¶ 61,163 (March 7, 2022) and *PJM Interconnection, L.L.C.*, 182 FERC ¶ 61,118 (Feb. 23, 2023).

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 December 31, 9998  
(excluding CSM Standards compliance)

(Clean Format)



## 4.2

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- (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 003.3, March 30, 2020);
- (3) To the extent not inconsistent with Transmission Provider's current NITS practices and procedures, WEQ-001, Open Access Same-Time Information System (OASIS), ([WEQ] Version 003.3, March 30, 2020); excluding Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2, 001-106.2.5, 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), ([WEQ] Version 003.3, March 30, 2020), excluding, however, the cryptographic security module of the cybersecurity standards, and excluding Business Practice Standards WEQ-002-4.3.6.6.1 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 ([WEQ] Version 003.3, March 30, 2020);
- (6) WEQ-004, Coordinate Interchange ([WEQ] Version 003.3, March 30, 2020);
- (7) WEQ-005, Area Control Error (ACE) Equation Special Cases ([WEQ] Version 003.3, March 30, 2020);
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- (9) WEQ-007, Inadvertent Interchange Payback ([WEQ] Version 003.3, March 30, 2020);

- (10) WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection ([WEQ] Version 003.3, March 30, 2020);
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- (13) WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, [OASIS] ([WEQ] Version 003.3, March 30, 2020);
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- (16) WEQ-022, Electric Industry Registry ([WEQ] Version 003.3, March 30, 2020); and
- (17) WEQ-023, Modeling ([WEQ] Version 003.3, March 30, 2020).

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*, 178 FERC ¶ 61,163 (March 7, 2022) and *PJM Interconnection, L.L.C.*, 182 FERC ¶ 61,118 (Feb. 23, 2023).

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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

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Effective December 31, 9998  
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(Redline Format)

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