

August 21, 2024

Honorable Debbie-Anne Reese, Acting Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E., Room 1A  
Washington, D.C. 20426

*Re: PJM Interconnection, L.L.C., Docket No. ER23-1784-00\_  
Order No. 676-J Compliance Revisions to Tariff, Section 4.2*

Dear Secretary Reese:

PJM Interconnection, L.L.C. (“PJM”), in compliance with the Commission’s October 26, 2023 Order on Compliance and Request for Waivers,<sup>1</sup> hereby submits revisions to PJM Open Access Transmission Tariff (“Tariff”), section 4.2<sup>2</sup> to incorporate by reference the North American Energy Standards Board (“NAESB”) Wholesale Electric Quadrant (“WEQ”) Version 3.3 Business Practice Standard related to the cryptographic security module (“CSM”) that were not incorporated by reference in PJM’s May 1, 2023 compliance filing in Docket No. ER23-1784-000.<sup>3</sup> PJM respectfully requests that the Commission accept the Tariff revisions described herein with an indefinite effective date of 12/31/9998.

Although the CSM has been certified, PJM’s cybersecurity and information technology teams anticipate the rollout of the cryptographic module will take nine to twelve months due to the extensive planning, communication, and changes required to avoid

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<sup>1</sup> *PJM Interconnection, L.L.C.*, 185 FERC ¶ 61,068 (2023) (“October 26 Order”).

<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. ER23-1784-000 (May 1, 2023) (“May 1 Filing”).

operational impacts from the new module. Given the time and effort required to fully roll out the product, PJM is proposing to incorporate compliance with the CSM in the Tariff now to allow PJM adequate time to upgrade the path PJM will need to follow to utilize the newly validated CSM.

## **I. BACKGROUND**

Order No. 676-J adopted North American Energy Standards Board (“NAESB”) Wholesale Electric Quadrant (“WEQ”) Business Practice Standards revisions and directed public utilities, like PJM, to revise their tariffs to incorporate these adopted revisions.<sup>4</sup> In Order No. 676-J, the Commission amended its regulations to incorporate by reference, as mandatory enforceable requirements, Version 3.3 of the NAESB WEQ Business Practice Standards (“WEQ Version 3.3 Standards”), which were filed with the Commission on March 30, 2020.<sup>5</sup> Order No. 676-J sequenced public utilities’ compliance with the WEQ Version 3.3 Standards, establishing an earlier filing deadline, and anticipating an earlier effective date, for the subset of the Version 3.3 Standards related to cybersecurity and parallel flow visualization.<sup>6</sup>

On May 1, 2023, PJM filed revisions to section 4.2 of its Tariff to incorporate by reference the subset of the Version 3.3 Standards that PJM has not already incorporated by reference through previous compliance filings. In the May 1 Filing, PJM explained that there was one exception to PJM’s proposed implementation of all remaining WEQ Version 3.3 Standards. PJM was not yet in a position to commit to implementing the CSM portion

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<sup>4</sup> *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-J, 175 FERC ¶ 61,139 (2021).

<sup>5</sup> Order No. 676-J at P 1.

<sup>6</sup> *Id.* at PP 49, 50.

of the Cybersecurity Standards because PJM's implementation was subject to validation by the National Institute of Standards and Technology ("NIST") Cryptographic Module Validation Program ("CMVP") of the cryptographic module that was provided by F5, the specialized technology company PJM contracted to provide this service.<sup>7</sup>

In the October 26 Order, the Commission accepted PJM's revisions to Tariff, section 4.2, to incorporate by reference the remainder of the revisions in Version 3.3 Standards, effective February 1, 2024, which excluded compliance with the CSM standards.<sup>8</sup> The Commission directed PJM to submit a further compliance filing with a revised tariff record to include compliance with the CSM standards within 30 days after PJM obtains validation from NIST CMVP of the cryptographic module provided by F5.<sup>9</sup> The Commission also granted all waivers PJM requested in the May 1 Filing, including "waiver of the CSM standards until PJM makes its compliance filing with a revised tariff record that includes compliance with the CSM standards."<sup>10</sup>

On July 22, 2024, NIST CMVP certified the CSM module. Consequently and in accordance with the October 26 Order, PJM submits this compliance filing to include compliance with the CSM standards. Although the cryptographic module provided by F5 has been certified, PJM's cybersecurity and information technology teams anticipate the rollout of the cryptographic module will take nine to twelve months due to the extensive

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<sup>7</sup> See May 1 Filing at 5-6.

<sup>8</sup> October 26 Order at P 1.

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

<sup>10</sup> *Id.* at PP 9-10.

planning, communication, and changes required to avoid operational impacts from the new module.

Given the uncertainty on when the module will be fully rolled out, PJM respectfully requests that the Commission accept the proposed tariff revisions with an indefinite effective date to allow PJM adequate time to upgrade the path PJM will need to follow to utilize the newly validated CSM.

## **II. REVISIONS TO TARIFF, SECTION 4.2**

As directed by the October 26 Order, PJM submits with this filing revisions to Tariff, section 4.2 subpart (4), to remove the language that excludes the cryptographic security module of the cybersecurity standards from the NAESB standards incorporated by reference.

## **III. EFFECTIVE DATE**

PJM respectfully requests that the Commission accept the revisions to Tariff, section 4.2 needed to incorporate compliance with the CSM from the NAESB WEQ Version 3.3 Standards with an indefinite effective date of 12/31/9998 to allow adequate time for PJM to upgrade the path it will need to follow to utilize the newly validated CSM.

#### **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, section 4.2 (redlined version); and
3. Attachment B – Revised Tariff, 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,<sup>11</sup> PJM will post a copy of this filing to the

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<sup>11</sup> See 18 C.F.R. §§ 35.2(e) & 385.2010(f)(3).

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 Region<sup>12</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>13</sup>

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<sup>12</sup> PJM already maintains, updates, and regularly uses email lists for all PJM Members and affected state commissions.

<sup>13</sup> *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270 (2008), *final rule*, Order No. 714-A, 147 FERC ¶ 61,115 (2014).

## VII. 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.

Respectfully submitted,

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

August 21, 2024

## **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 21st day of August 2024.

/s/ Krystal Tapper  
Krystal Tapper

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



# Attachment A

## Revisions to the PJM Open Access Transmission Tariff

(Marked/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), *PJM Interconnection, L.L.C.*, 178 FERC ¶ 61,163 (March 7, 2022), *PJM Interconnection, L.L.C.*, 182 FERC ¶ 61,118 (Feb. 23, 2023), *PJM Interconnection, L.L.C.*, 185 FERC ¶ 61,068 (Oct. 26, 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 003.3, 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);
- (8) WEQ-006, Manual Time Error Correction ([WEQ] Version 003.1, Sept. 30, 2015);
- (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);
- (11) WEQ-011, Gas/Electric Coordination, ([WEQ] Version 003.3, March 30, 2020);
- (12) WEQ-012, Public Key Infrastructure (PKI) ([WEQ] Version 003.3, March 30, 2020);
- (13) WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, [OASIS] ([WEQ] Version 003.3, March 30, 2020);
- (14) WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response ([WEQ] Version 003.3, March 30, 2020);
- (15) WEQ-021, Measurement and Verification of Energy Efficiency Products ([WEQ] Version 003.3, March 30, 2020);
- (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), *PJM Interconnection, L.L.C.*, 182 FERC ¶ 61,118 (Feb. 23, 2023), and *PJM Interconnection, L.L.C.*, 185 FERC ¶ 61,068 (Oct. 26, 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

(Clean Format)

## 4.2

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- (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 Business Practice Standards WEQ-002-4.3.6.6.1 and WEQ-002-4.3.6.6.2;
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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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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.