



PJM Interconnection, L.L.C.  
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February 2, 2026

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

*Re: PJM Interconnection L.L.C., Docket No. ER22-2359-005  
Informational Filing Providing Precise Effective Date for Order No. 881 Implementation*

Dear Secretary Reese,

Pursuant to the March 31, 2025 Order of the Federal Regulatory Commission (“Commission”) granting PJM’s request for extension of the deadline to comply with establishment of effective dates for implementation of Order No. 881, PJM submits this informational filing to provide notice that PJM will implement Order No. 881 requirements beginning March 4, 2026.<sup>1</sup>

In accordance with PJM’s February 28, 2025 filing and as accepted by the March 31, 2025 Order, PJM provides this notice more than 30 days in advance of its requested effective date of March 4, 2026.

## **I. BACKGROUND**

In Order No. 881, the Commission found that, because of the relationship between transmission line ratings and wholesale rates, inaccurate transmission line ratings cause the rates for the transmission of electric energy in interstate commerce and the sale of electric energy at wholesale in interstate commerce to be unjust and unreasonable.<sup>2</sup> In order to ensure just and reasonable wholesale rates that more accurately reflect the costs of the wholesale service provided, the Commission adopted reforms that imposed certain obligations on transmission providers and public utility transmission owners related to transmission line

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<sup>1</sup> PJM will collaborate with the Transmission Owners to promptly submit a clean-up filing to update and align the metadata associated with the previously accepted Order No. 881 filings.

<sup>2</sup> *Managing Transmission Line Ratings*, 177 FERC ¶ 61,179, at PP 3, 29-30 (“Order No. 881”) and *Managing Transmission Line Ratings*, 179 FERC ¶ 61,125 at PP 4 (“Order No. 881-A”).

ratings.<sup>3</sup>

In its Order on Compliance Filing<sup>4</sup>, the Commission found that PJM’s July 12, 2022 Compliance Filing<sup>5</sup> was partially compliant with the requirements of Order No. 881, and as such, the Commission accepted the July 12, 2022 Compliance Filing, subject to further compliance. Specifically, the Commission directed PJM to file: (1) an explanation of PJM’s timeline for notifying the Commission of the precise effective date of its Tariff revisions;<sup>6</sup> (2) proposed tariff revisions to include consideration for the technical limitations of the transmission system (such as system voltage or stability limits) in the definition(s) and to require that line ratings based on such technical limitations be determined in accordance with a written line rating methodology consistent with good utility practice, or explain why PJM should not be required to do so;<sup>7</sup> (3) proposed tariff revisions, or, in the alternative, a compliance filing that identifies existing tariff provisions that specify PJM will use updated Ambient-Adjusted Ratings (“AARs”) as part of any market process associated with the Day-ahead and Real-time Energy Markets;<sup>8</sup> (4) an explanation of the timelines for calculating or submitting (AARs) to be filed no later than November 12, 2024;<sup>9</sup> (5) a proposed methodology for AAR implementation that delineates the expected roles between Transmission Owners and PJM<sup>10</sup>; and (6) proposed Tariff revisions stating that PJM will share ratings and methodologies with all

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<sup>3</sup> Order No. 881 at PP 3, 29-30.

<sup>4</sup> *PJM Interconnection, L.L.C.*, 183 FERC ¶ 61,117 at PP 1 (2023) (“Order on Compliance Filing”).

<sup>5</sup> *PJM Interconnection, L.L.C.*, Order Nos. 881 and 881-A Compliance Filing, Docket No. ER22-2359-000 (July 12, 2022) (“July 12, 2022 Compliance Filing”).

<sup>6</sup> Order on Compliance Filing at P 10.

<sup>7</sup> Order on Compliance Filing at P 15.

<sup>8</sup> Order on Compliance Filing at P 22.

<sup>9</sup> Order on Compliance Filing at P 30.

<sup>10</sup> Order on Compliance Filing at P 39. In its June 21 Notice, the Commission granted PJM’s request for an extension of time to September 29, 2023 to comply with the Commission’s directive related to the delineation of roles and responsibilities no later than September 29, 2023. *See PJM Interconnection, L.L.C.*, Notice Granting Extension of Time, Docket No. ER22-2359-000 (June 21, 2023).

transmission providers.<sup>11</sup> On July 18, 2023, PJM submitted its Compliance Filing<sup>12</sup> addressing all issues raised in FERC’s Order on Compliance Filing.

On September 29, 2023, PJM submitted a subsequent compliance filing on the limited substantive issue specifying delineation of the roles and responsibilities between PJM and the PJM Transmission Owners.<sup>13</sup> On that same date, the PJM Transmission Owners filed the Consolidated Transmission Owners Agreement (“CTOA”) Order No. 881 Amendments to modify section 4.11 and related definitions specifying the PJM Transmission Owners’ commitments and undertakings with respect to transmission facility ratings and delineating roles and responsibilities of the PJM Transmission Owners and PJM.<sup>14</sup> On November 22, 2023, the Commission accepted PJM’s Compliance Filing, subject to further compliance filings, and accepted the CTOA Order No. 881 Amendments.<sup>15</sup>

On September 16, 2024, PJM filed a Motion for Leave to submit Compliance Filing and Compliance Filing addressing a limited ministerial issue removing obsolete language in PJM’s Operating Agreement and Tariff considering PJM’s previous compliance filings and given the Commission-approved Tariff and CTOA language, consistent with Order No. 881 directives.<sup>16</sup>

On November 12, 2024, PJM submitted its Fifth Compliance Filing providing: (1) the required notification of the effective date for the Commission-approved Tariff revisions; and (2) the required

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<sup>11</sup> Order on Compliance Filing at P 53.

<sup>12</sup> *PJM Interconnection, L.L.C.*, Order Nos. 881 and 881-A Compliance Filing, Docket No. ER22-2359-001 (July 18, 2023).

<sup>13</sup> *PJM Interconnection, L.L.C.*, 3rd Compliance Filing and Errata to PJM’s July 18, 2023 Compliance Filing, Docket No. ER22-2359-002 (Sep. 29, 2023).

<sup>14</sup> *East Kentucky Power Cooperative, Inc.*, Amendments to the PJM Consolidated Transmission Owners Agreement for Implementation of Order No. 881 of the PJM Transmission Owners, Docket No. ER23-2964-000 (Sep. 29, 2023).

<sup>15</sup> *PJM Interconnection, L.L.C., et al.*, Letter Order, Docket Nos. ER22-2359-001, -002, and ER23-2964-000 (not consolidated) (Nov. 22, 2023).

<sup>16</sup> *PJM Interconnection, L.L.C.*, Motion for Leave to Submit Compliance Filing and Compliance Filing, Docket No. ER22-2359-003 (Sep. 16, 2024) (“September 2024 Motion”). PJM’s September 2024 Motion is pending a Commission decision.

timelines for submitting AARs and the rating set look-up tables that lead to AAR derivation.<sup>17</sup> In this Fifth Compliance Filing, PJM anticipated and informed the Commission of the potential need to seek an extension of time for implementation and compliance, as sought herein.

As referenced above, on February 28, 2025, PJM filed and FERC subsequently accepted PJM's extension request which demonstrated that PJM (like its other RTO/ISO counterparts) faced industry-wide delays beyond its control.<sup>18</sup> The Commission accepted PJM's extension request contingent upon PJM providing this informational filing no less than 30 days before the final effective date for Order No. 881 implementation.<sup>19</sup>

## II. COMMUNICATIONS

PJM requests that all communications regarding this filing be directed to the following persons:

Craig Glazer  
Vice President – Federal Government Policy  
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<sup>17</sup> *PJM Interconnection, L.L.C.*, 5th Compliance Filing, Docket No. ER22-2359-004 (Nov. 12, 2024) (“Fifth Compliance Filing”). PJM’s Fifth Compliance Filing is pending a Commission decision.

<sup>18</sup> *PJM Interconnection, L.L.C., East Kentucky Power Cooperative, Inc.*, Joint Motion for Extension of Time to Comply and Request for Expedited Action of PJM and PJM Transmission Owners, Docket Nos. ER22-2359-000 and ER23-2964-000 (not consolidated) (Feb. 28, 2025).

<sup>19</sup> *PJM Interconnection, L.L.C., East Kentucky Power Cooperative, Inc.*, Letter Order, Docket Nos. ER22-2359-000 and ER23-2964-000 (not consolidated) (Mar. 31, 2025).

## **VI. 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,<sup>20</sup> 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> 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<sup>21</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 FERC's eLibrary website located at the following link: <http://www.ferc.gov/docsfiling/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.

## **VII. CONCLUSION**

PJM respectfully requests the Commission accept this informational filing as responsive to the March 31, 2025 Order, as expressly confirming March 4, 2026, as the final effective date for Order No. 881 compliance. Additionally, PJM acknowledges that Order 881 compliance will be effective at the beginning of market day on March 4, 2026. As a result, all essential Day-Ahead activities performed on March 3, 2026 for market day March 4, 2026 will incorporate transmission line ratings compliant with Order 881 to ensure accuracy of Day-Ahead results.

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<sup>20</sup> See 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).

<sup>21</sup> PJM already maintains updates and regularly uses e-mail lists for all PJM Members and affected state commissions.

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Respectfully submitted,

*/s/ Erin Lai*

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*On behalf of PJM Interconnection, L.L.C.*