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November 12, 2024

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. ER22-2359-00\_5th Compliance Filing*

Dear Secretary Reese,

In further compliance with the Commission’s May 18, 2023 Order on Compliance (“Order on Compliance Filing”)<sup>1</sup> in this docket, PJM Interconnection, L.L.C. (“PJM”) submits a fifth Compliance Filing to the Commission’s Order on Compliance Filing (the “Fifth Compliance Filing”). The Fifth Compliance Filing provides the required notification of the effective date for the Commission-approved Open Access Transmission Tariff (“Tariff”) revisions, consistent with Order Nos. 881 and 881-A (collectively referred to herein as “Order No. 881” or “Final Rule”) directives. In addition, the Fifth Compliance Filing provides the required timelines for submitting AARs and the rating set look-up tables that lead to AAR derivation.

## **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

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<sup>1</sup> *PJM Interconnection, L.L.C.*, 183 FERC ¶ 61,117 (issued May 18, 2023) (“Order on Compliance Filing”).

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

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 ratings.<sup>3</sup>

In the Order on Compliance Filing, the Commission found that PJM's July 12, 2022 filing ("July 12, 2022 Compliance Filing") was partially compliant with the Commission's Order No. 881 requirements, and as such, accepted PJM's filing, subject to further compliance.<sup>4</sup> On July 18, 2023, PJM submitted a Compliance Filing addressing all issues raised in FERC's Order on Compliance Filing, with the exception of the directive to delineate the roles and responsibilities between PJM and the PJM Transmission Owners.<sup>5</sup>

PJM and the PJM Transmission Owners worked diligently to clarify the delineation of their respective roles and responsibilities regarding Transmission Facility Ratings, resulting in filed revisions to the Consolidated Transmission Owners Agreement, Rate Schedule No. 42, Article 4.11, and Tariff, Attachment W. These proposed revisions were subsequently accepted by the Commission on November 22, 2023.<sup>6</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

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<sup>3</sup> Order No. 881, 177 FERC ¶ 61,179 at PP 3, 29-30.

<sup>4</sup> Order on Compliance Filing at PP 1.

<sup>5</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 this one directive related to 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 (issued July 21, 2023).

<sup>6</sup> *PJM Interconnection, L.L.C.*, Letter Order, Docket Nos. ER22-2359-001, ER22-2359-002 and ER23-2964-000 (November 22, 2023).

Operating Agreement and Tariff in light of PJM's previous compliance filings and given the Commission-approved Tariff and Consolidated Transmission Owners Agreement language, consistent with Order No. 881 directives.<sup>7</sup>

## **II. EXPLANATION OF THE TIMELINES FOR CALCULATING OR SUBMITTING AARs WILL BE REFLECTED IN THE PJM MANUALS**

PJM sets forth below the timelines for calculating and submitting AARs, proposes to modify on compliance Tariff, Attachment W to clarify that certain details regarding AARs will be reflected in the PJM Manuals, and describes the specific manual revisions PJM will implement on compliance regarding the timelines for calculating and submitting AARs.

In the May 18, 2023 Order, the Commission directed PJM to explain its timelines for calculating or submitting AARs.<sup>8</sup> In response to this compliance directive, PJM explains that Transmission Owners must provide PJM with Transmission Facility Ratings for their Transmission Facilities. These Transmission Facility Ratings are provided to PJM via AAR look-up tables. New or reconfigured Transmission Facilities must follow PJM procedures prior to energization, including ensuring look-up tables are updated by 11:00 hours the day prior to scheduled energization, where applicable.<sup>9</sup> To meet compliance responsibilities within the Operations and Operations Planning time horizons, preliminary AAR look-up tables shall be provided to the Office of the Interconnection as soon as the Transmission Owner confirms their

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<sup>7</sup> PJM's September 2024 Motion is pending a Commission decision. *PJM Interconnection, L.L.C.*, Motion for Leave to Submit Compliance Filing and Compliance Filing, Docket No. ER22-2359-003.

<sup>8</sup> Order on Compliance Filing at P 28-30.

<sup>9</sup> PJM Manual 03: Transmission Operations, § 4.2.3 (rev. 66, May 22, 2024), <https://pjm.com/-/media/documents/manuals/m03.ashx>.

use and no later than the above energization timeframe.

Transmission Owners opting to provide the Office of the Interconnection with AAR zonal ambient conditions (temperature set reflecting ambient temperature and solar condition for the Transmission Facilities within a given Transmission Owner's zone) in real-time as well as hourly and seasonal forecasts shall give a minimum of 10 business days' notice to the Office of the Interconnection of their intent to do so. Any real-time Transmission Facility DLR or AAR zonal ambient conditions shall be provided via telemetry.

Transmission Owners providing hourly AAR ambient condition or Transmission Facility DLR forecasts to the Office of the Interconnection must do so at least 120 minutes ahead of the timespan to which the ambient condition applies. Hourly DLR forecasts must cover a minimum of 36 hours in order to cover PJM's day ahead projections. Hourly AAR ambient condition or DLR forecasts may cover up to the entire 240 hourly span. Seasonal ambient condition forecasts must be updated annually and may be updated at any point up to the minimum timeframe for their use, which terminates 240 hours prior to the end of the given season. Transmission Owner hourly ambient condition or DLR forecasts that are not provided within the identified timeframes or fall short of the entire 240 hourly AAR forecasts shall default to the Office of the Interconnection's vendor-derived AAR ambient condition hourly projections. Likewise, seasonal ambient condition forecasts which fail to be provided per the identified timeframes, or which fall short of future seasonal projections, shall default to the Office of the Interconnection's Seasonal Facility Ratings.

For AAR Transmission Facilities, the Office of the Interconnection applies the hourly or seasonal ambient condition projections to the AAR look-up tables to determine each Transmission Facility's AAR and Seasonal Facility Rating forecasts. For DLR Transmission Facilities, a

Transmission Owner's hourly AAR DLR-based forecast supersedes any derived for the same hours leveraging AAR zonal ambient condition.

To the extent not already codified in the PJM Manuals or governing documents, the timelines described above for calculating and submitting AARs will comport with PJM Markets and Operations procedures and PJM will include these timelines for purposes of compliance with Order No. 881 in the PJM Manuals. PJM also proposes on compliance an additional revision to Attachment W:

As required by the Consolidated Transmission Owners Agreement, each Transmission Owner provides PJM with its respective Transmission Facility Ratings and PJM reviews and implements the applicable Transmission Facility Rating(s) consistent with this Tariff, Attachment W, ~~and~~ the Consolidated Transmission Owners Agreement, **and the PJM Manuals.**

This proposed language is consistent with longstanding and recent Commission-accepted language in the Consolidated Transmission Owners Agreement regarding line ratings that was filed on compliance in this proceeding.<sup>10</sup>

### **III. EFFECTIVE DATE**

Consistent with PJM's prior Order No. 881 compliance filings, PJM requests a July 12, 2025 effective date for the Operating Agreement and Tariff revisions. This requested effective date is three years from the date of PJM's July 12, 2022 Compliance Filing, consistent with the Commission's directive.<sup>11</sup> While PJM remains on track for July 2025 implementation, PJM has recently identified potential reasons why it may be appropriate to seek an extension of time for

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<sup>10</sup> Amendments to the PJM Consolidated Transmission Owners Agreement for Implementation of Order No. 881 Docket No. ER23-2964-000 (September 29, 2023); *PJM Interconnection, L.L.C.*, Letter Order, Docket Nos. ER22-2359-001, ER22-2359-002 and ER23-2964-000 (November 22, 2023).

<sup>11</sup> Order No. 881 at P 12.

implementation and compliance, not inconsistent with other entities' requests which have been approved.<sup>12</sup> PJM is preparing and intends to soon file an appropriate motion seeking an extension of the implementation and effective dates. PJM will, in parallel, evaluate whether it should submit any additional compliance filings relating to the effective date and compliance date to modify the relief sought herein.

#### IV. 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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#### VI. DOCUMENTS INCLUDED WITH THIS FILING

In accordance with the requirements of Order No. 714<sup>13</sup> and the Commission's eTariff regulations, PJM hereby submits an eTariff XML filing package consisting of the following

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<sup>12</sup> *New York Independent System Operator, Inc. (NYISO)*, Letter Order, Docket No. ER22-2380-000 (March 29, 2024). The Commission granted NYISO's request for extension to implement the tariff revisions accepted by the Commission in its Order No. 881 compliance filing until a to-be determined date no later than December 31, 2028.

<sup>13</sup> *Electronic Tariff Filings*, 124 FERC ¶ 61,270 (2008).

materials:

1. This transmittal letter;
2. Attachment A – Revisions to the Tariff, marked/redlined format; and
3. Attachment B – Revisions to the Tariff, in clean format.

## VIII. CONCLUSION

In accordance with the foregoing, PJM respectfully requests that the Commission accept the proposed modifications on compliance to Tariff, Attachment W to clarify that certain details regarding AARs will be reflected in the PJM Manuals, as discussed herein.

Respectfully submitted,

/s/ Erin Lai

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

# Attachment A

## Revisions to the PJM Open Access Transmission Tariff

(Marked / Redline Format)



## ATTACHMENT W

### Transmission Facility Ratings

#### GENERAL

The Office of the Interconnection and the Transmission Owners will implement Transmission Facility Ratings on the Transmission Facilities over which the Office of the Interconnection provides Transmission Service, as provided below.

As required by the Consolidated Transmission Owners Agreement, each Transmission Owner provides PJM with its respective Transmission Facility Ratings and PJM reviews and implements the applicable Transmission Facility Rating(s) consistent with this Tariff, Attachment W, ~~and~~ the Consolidated Transmission Owners Agreement, and the PJM Manuals.

Use of temporary conditional Transmission Facility Ratings to Ensure the Safety and Reliability of the Transmission System (System Reliability):

If the Office of the Interconnection or Transmission Owner reasonably determines, consistent with Good Utility Practice, that the temporary conditional use of a Transmission Facility Rating different than would otherwise be required by this Attachment is necessary to ensure the safety and reliability of the Transmission System, including the application of a surrogate rating override to the Transmission Facility Rating representing an equivalent voltage or stability limit, such as, but not exclusive to, that which is identified in Tariff, Attachment C, then the Office of the Interconnection or Transmission Owner may use such a temporary conditional rating. The entity that makes this determination must document in the Office of the Interconnection's database of Transmission Facility Ratings and Transmission Facility Rating methodologies on OASIS or another password-protected website, as required by this Attachment, the use of an alternate Transmission Facility Rating under this paragraph, including the nature of and basis for the temporary conditional rating, the date and time that the alternate rating was initiated, and (if applicable) the date and time that the alternate rating was withdrawn and the standard rating became effective again.

Obligations of the Office of the Interconnection:

The Office of the Interconnection will have the following obligations:

The Office of the Interconnection must use AARs, or AAR Exceptions where appropriate, as the relevant Transmission Facility Ratings when performing any of the following functions: (1) evaluating requests for Near-Term Transmission Service; (2) responding to requests for information on the availability of potential Near-Term Transmission Service (including requests for ATC or other information related to potential service); or (3) posting ATC or other information related to Near-Term

Transmission Service to the Office of the Interconnection's OASIS site or another password-protected website.

The Office of the Interconnection must use AARs, or AAR Exceptions where appropriate, as the relevant Transmission Facility Ratings when determining whether to curtail (Tariff, Part II, section 13.6) Firm Point-To-Point Transmission Service or when determining whether to curtail and/or interrupt (Tariff, Part II, section 14.7) Non-Firm Point-To-Point Transmission Service if such curtailment and/or interruption is both necessary because of issues related to flow limits on Transmission Facilities and anticipated to occur (start and end) within 10 days of such determination. For determining whether to curtail or interrupt Point-To-Point Transmission Service in other situations, the Office of the Interconnection must use Seasonal Facility Ratings as the relevant Transmission Facility Ratings.

The Office of the Interconnection must use AARs, or AAR Exceptions where appropriate, as the relevant Transmission Facility Ratings when determining whether to curtail (Tariff, Part III, section 33) or redispatch (Tariff, Part III, section 30.5 and/or Tariff, Part III, section 33) Network Integration Transmission Service or secondary service if such curtailment or redispatch is both necessary because of issues related to flow limits on Transmission Facilities and anticipated to occur (start and end) within 10 days of such determination. For determining the necessity of curtailment or redispatch of Network Integration Transmission Service or secondary service in other situations, the Office of the Interconnection must use Seasonal Facility Ratings as the relevant Transmission Facility Ratings.

The Office of the Interconnection must use Seasonal Facility Ratings as the relevant Transmission Facility Ratings when evaluating requests for and whether to curtail, interrupt, or redispatch any Transmission Service not otherwise covered above in this section (including, but not limited to, requests for non-Near-Term Transmission Service or requests to designate or change the designation of Network Resources or Network Load), when developing any ATC or other information posted or provided to potential customers related to such services. The Office of the Interconnection must use Seasonal Facility Ratings as a recourse rating in the event that an AAR otherwise required to be used under this Attachment is unavailable.

The Office of the Interconnection must use uniquely determined Emergency Ratings for contingency analysis in the operations horizon and in post-contingency simulations of constraints. Such uniquely determined Emergency Ratings must also include separate AAR for each Emergency Rating duration used.

Any forecasts of ambient air temperature for AARs and Seasonal Facility Ratings developed by the Office of the Interconnection or the Transmission Owner must be developed consistent with Good Utility Practice and on a non-discriminatory basis.

Postings to the Office of the Interconnection's OASIS or another password-protected website: The Office of the Interconnection must maintain on the password-protected section of its OASIS page or on another password-protected website a database of

Transmission Facility Ratings and Transmission Facility Rating methodologies. This database must be accessible to the Market Monitoring Unit. The database must include a full record of all Transmission Facility Ratings, both as used in real-time operations, and as used for all future periods for which Transmission Service is offered. Any postings of temporary alternate Transmission Facility Ratings or exceptions used under the System Reliability section above or the Exceptions section below, respectively, are considered part of the database. The database must include records of which Transmission Facility Ratings and Transmission Facility Rating methodologies were in effect at which times over at least the previous five years, including records of which temporary alternate Transmission Facility Ratings or exceptions were in effect at which times during the previous five years. Each record in the database must indicate which Transmission Facility the record applies to, and the date and time the record was entered into the database. The database must be maintained such that users with OASIS access or access to the password-protected website can view, download, and query data in standard formats, using standard protocols.

Sharing with Transmission Providers: The Office of the Interconnection must share, upon request by any Transmission Provider and in a timely manner, the following information:

- (1) Transmission Facility Ratings for each period for which Transmission Facility Ratings are evaluated, with updated ratings shared each time Transmission Facility Ratings are evaluated, and
- (2) Written Transmission Facility Rating methodologies used in arriving at the Transmission Facility Ratings in (1) above.

#### AAR Exceptions:

Where the Transmission Owner determines, consistent with Good Utility Practice, that the Transmission Facility Rating of a Transmission Facility is not affected by ambient air temperature or solar heating, the Office of the Interconnection and Transmission Owner may use a Transmission Facility Rating for that Transmission Facility that is not an AAR or Seasonal Transmission Facility Rating, including consideration for the technical limitations of the transmission system (such as system voltage or stability limits). Examples of such a Transmission Facility may include (but are not limited to): (1) a Transmission Facility for which the technical transfer capability of the limiting conductors and/or limiting transmission equipment is not dependent on ambient air temperature or solar heating; or (2) a Transmission Facility whose transfer capability is limited by a Transmission System limit (such as a system voltage or stability limit) which is not dependent on ambient air temperature or solar heating. The entity that makes this determination must document in the Office of the Interconnection's database of Transmission Facility Ratings and Transmission Facility Rating methodologies on OASIS or another password-protected website any exceptions to the requirements contained in this Attachment initiated under this paragraph, including the nature of and basis for each exception, the date(s) and time(s) that the exception was initiated, and (if applicable) the date(s) and time(s) that each exception was withdrawn and the standard

rating became effective again. If the technical basis for an exception under this paragraph changes, then the Transmission Owner must update the relevant Transmission Facility Rating(s) in a timely manner. The Transmission Owner must reevaluate any exceptions taken under this paragraph at least every five years.

# Attachment B

## Revisions to the PJM Open Access Transmission Tariff

(Clean Format)

## ATTACHMENT W

### Transmission Facility Ratings

#### GENERAL

The Office of the Interconnection and the Transmission Owners will implement Transmission Facility Ratings on the Transmission Facilities over which the Office of the Interconnection provides Transmission Service, as provided below.

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If the Office of the Interconnection or Transmission Owner reasonably determines, consistent with Good Utility Practice, that the temporary conditional use of a Transmission Facility Rating different than would otherwise be required by this Attachment is necessary to ensure the safety and reliability of the Transmission System, including the application of a surrogate rating override to the Transmission Facility Rating representing an equivalent voltage or stability limit, such as, but not exclusive to, that which is identified in Tariff, Attachment C, then the Office of the Interconnection or Transmission Owner may use such a temporary conditional rating. The entity that makes this determination must document in the Office of the Interconnection's database of Transmission Facility Ratings and Transmission Facility Rating methodologies on OASIS or another password-protected website, as required by this Attachment, the use of an alternate Transmission Facility Rating under this paragraph, including the nature of and basis for the temporary conditional rating, the date and time that the alternate rating was initiated, and (if applicable) the date and time that the alternate rating was withdrawn and the standard rating became effective again.

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The Office of the Interconnection must use Seasonal Facility Ratings as the relevant Transmission Facility Ratings when evaluating requests for and whether to curtail, interrupt, or redispatch any Transmission Service not otherwise covered above in this section (including, but not limited to, requests for non-Near-Term Transmission Service or requests to designate or change the designation of Network Resources or Network Load), when developing any ATC or other information posted or provided to potential customers related to such services. The Office of the Interconnection must use Seasonal Facility Ratings as a recourse rating in the event that an AAR otherwise required to be used under this Attachment is unavailable.

The Office of the Interconnection must use uniquely determined Emergency Ratings for contingency analysis in the operations horizon and in post-contingency simulations of constraints. Such uniquely determined Emergency Ratings must also include separate AAR for each Emergency Rating duration used.

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timely manner. The Transmission Owner must reevaluate any exceptions taken under this paragraph at least every five years.