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FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, DC 20426

July 30, 2019

In Reply Refer To:  
PJM Interconnection, L.L.C.  
Docket No. ER19-2030-000

PJM Interconnection, L.L.C.  
2750 Monroe Boulevard  
Audubon, PA 19403-2497

Attention: Mark J. Stanisz

Dear Mr. Stanisz:

1. On May 31, 2019, pursuant to section 205 of the Federal Power Act (FPA),<sup>1</sup> and Part 35 of the Commission's regulations,<sup>2</sup> you filed on behalf of PJM Interconnection, L.L.C. (PJM) revisions to Part IV, Subparts A and G of the PJM Open Access Transmission Tariff (Tariff) that would give all interconnection customers 10 business days to resolve deficiencies in otherwise complete and timely interconnection requests.<sup>3</sup> As discussed below, we accept PJM's filing, effective July 31, 2019, as requested.

2. On December 20, 2016, the Commission accepted for filing certain Tariff revisions relating to PJM's interconnection request and feasibility study process. That filing revised PJM's interconnection request, deficiency review, and deposit usage rules to create incentives for interconnection customers to submit interconnection requests earlier in the queue window. As relevant here, that filing revised the deficiency review process so that any queue position for which an interconnection customer has not cleared

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<sup>1</sup> 16 U.S.C. § 824d (2012).

<sup>2</sup> 18 C.F.R. pt 35 (2018).

<sup>3</sup> PJM, Intra-PJM Tariffs, OATT (7.0.1), § 36.1; OATT (9.0.0), § 110.1; OATT (8.0.0), § 111.1; OATT (7.0.0), § 112.1; and OATT (9.0.0), § 112A.1.

the deficiencies before the close of the relevant queue window shall be deemed to be terminated and withdrawn.<sup>4</sup>

3. PJM proposes revisions to Part IV, Subparts A and G of its Tariff to give all interconnection customers 10 business days to resolve PJM-identified deficiencies in otherwise complete and timely interconnection requests, regardless of when an interconnection request is submitted during an open queue window. PJM is removing a provision stating that any customer who has failed to clear deficiencies before the close of the relevant queue shall be deemed to be terminated and withdrawn. This change then leaves in place a provision stating that all customers have 10 business days in which to cure deficiencies.<sup>5</sup>

4. PJM states that this change rectifies a problem that has occurred for customers submitting interconnection requests at or near the end of the queue window. Under PJM's existing Tariff, these customers have little or no time to cure deficiencies. PJM states that these proposed revisions will provide that all interconnection requests that are submitted in the same open queue window have the same initial deficiency response period and opportunity to cure, an equity that the current Tariff provisions do not provide. PJM argues that these proposed revisions will reduce the need for interconnection customers to seek alternative relief through waivers of the current deficiency review process rules when a queue window closes.<sup>6</sup> PJM contends that this change is warranted because the 2016 Tariff changes have not reduced the number of interconnection requests submitted in the last two weeks of an open queue window.

5. Additionally, PJM states that it also submits minor, non-substantive revisions to address certain formatting issues and modify references located in the sections of the Tariff that PJM proposes to revise in this filing. PJM asserts that these revisions are part of its ongoing efforts to continually review and make non-controversial and non-substantive revisions to enhance PJM's governing documents.<sup>7</sup> PJM adds that the revisions proposed in this filing were overwhelmingly endorsed by PJM stakeholders.

6. Notice of PJM's May 31, 2019 filing was published in the *Federal Register*, 84 Fed. Reg. 26,664 (2019), with interventions and protests due on or before June 21, 2019. Exelon Corporation, Delaware Division of the Public Advocate, Monitoring

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<sup>4</sup> *PJM Interconnection, L.L.C.*, Docket No. ER16-2518-000 (Dec. 20, 2016) (delegated order).

<sup>5</sup> PJM Transmittal at 5.

<sup>6</sup> *Id.* at 1, 7-8.

<sup>7</sup> *Id.* at 8.

Analytics, LLC, American Municipal Power, Inc., and Dominion Energy Services, Inc. filed motions to intervene. Enel Green Power North America, Inc. (Enel) and EDF Renewables, Inc. (EDF Renewables) filed motions to intervene and comments in support of the filing. Calpine Corporation (Calpine) filed an out-of-time motion to intervene.

7. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2018), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

8. Pursuant to Rule 214(d) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214(d) (2018), the Commission will grant Calpine's late-filed motion to intervene given its interest in the proceeding, the early stage of the proceeding, and the absence of undue prejudice or delay.

9. In its comments, Enel states that it supports PJM's filing. Enel explains that if PJM has a question about any piece of the documentation that supports the interconnection request, it is just and reasonable for the interconnection customer to have a reasonable amount of time to address PJM's question. Enel contends that PJM's current Tariff process, at times, has precluded an opportunity for the interconnection customer to review and cure PJM's questions, resulting in automatic termination of the interconnection request from the queue. Enel asserts that PJM's proposed revisions will allow all interconnection customers that submit an interconnection request in a PJM queue window to be treated the same and be afforded the same time allotment to cure PJM questions.<sup>8</sup>

10. In its comments, EDF Renewables states that it supports PJM's proposed revisions. EDF Renewables asserts that it is important that PJM afford sufficient time for an interconnection customer to correct any deficiencies, which sometimes are simply misunderstandings. EDF Renewables states that PJM's proposed revisions will ensure that the significant cost incurred by the interconnection customer to submit an interconnection request, and to achieve the anticipated commercial operation date for its proposed generation, is not derailed because there was insufficient time to cure any PJM-identified deficiency.<sup>9</sup>

11. EDF Renewables makes additional suggestions for PJM's interconnection queue process. Specifically, EDF Renewables argues that site control continues to be a point of contention for generation developers in PJM, and that PJM has rejected interconnection requests on *de minimis* technicalities about the supporting site control documents. EDF Renewables states that more flexibility is needed to cure all PJM-perceived deficiencies

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<sup>8</sup> Enel Comments at 1-2.

<sup>9</sup> EDF Renewables Comments at 2-3.

in interconnection requests. EDF Renewables states that a flexible approach will ensure that PJM is not acting as the deterrent to bringing new generation on line in time to meet the upcoming generation retirements that PJM is facing. EDF Renewables urges PJM to adopt more sensible measures to reform their interconnection queue process, and for the Commission to support PJM in doing so.<sup>10</sup>

12. We accept PJM's proposed Tariff amendments, effective July 31, 2019, as requested. We agree with PJM, Enel, and EDF Renewables that it is just and reasonable for the interconnection customer to be given the same 10-day period in which to cure deficiencies regardless of when the interconnection request is filed relative to the end of the queue window.

13. As for EDF Renewables' argument that PJM should address other interconnection reforms, such as site control, we find that this argument is beyond the scope of this FPA section 205 proceeding.

By direction of the Commission. Commissioner McNamee is not participating.

Kimberly D. Bose,  
Secretary.

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<sup>10</sup> *Id.* at 3-4.