

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Transmission Line Ratings and
Related Practices** :

Docket No. AD19-15-000

**POST-TECHNICAL CONFERENCE REPLY COMMENTS OF
PJM INTERCONNECTION, L.L.C.**

Pursuant to the Federal Energy Regulatory Commission's ("Commission") Notice Inviting Post-Technical Conference Comments (the "Notice") published in the above-referenced docket on October 2, 2019, PJM Interconnection, L.L.C. ("PJM") hereby submits¹ reply comments in response to initial comments filed in this docket.

In summary, PJM's reply comments respond to two issues raised by initial commenters:

- First, PJM should have the opportunity to gain operating experience with dynamic line ratings ("DLRs"), particularly through pilot programs to facilitate the strategic implementation of this grid enhancing technology.
- Second, contrary to the suggestion of some commenters, PJM presently reviews and studies facility ratings under defined circumstances.

I. COMMENTS

1. PJM Should Have the Opportunity to Gain Operating Experience with DLRs, Particularly Through Pilot Programs to Facilitate the Strategic Implementation of this Grid Enhancing Technology.

Some commenters suggest that transmission owners and regional transmission organizations/independent system operators ("RTOs/ISOs") should adopt a new or separate process to perform a cost-benefit analysis relating to the deployment of DLRs or other

¹ PJM respectfully seeks leave to file these reply comments beyond the indicated period, due to the press of other matters. No party will be prejudiced by this request.

congestion mitigation technologies for lines that are conductor limited, or termination equipment upgrades for lines that are not conductor limited. In addition, those commenters suggest that transmission or interconnection customers (and other stakeholders) should be able to request a study of DLR options for specific lines.²

At least in the case of PJM, no new or separate DLR-specific cost-benefit processes should be developed at this time. To further facilitate the strategic implementation of DLRs within its footprint, PJM (and other RTOs/ISOs) should be given the opportunity to gain operating experience with DLRs, particularly through the use of pilot programs, to study opportunities for the use of DLRs to alleviate congestion on specific lines.³ It should also be noted that if a project proposer were to attempt to propose a DLR project to address an identified congestion driver as a market efficiency project during a long term competitive proposal window, PJM would perform a cost-benefit analysis obviating in this circumstance the need for new or separate cost-benefit processes.⁴

Nevertheless, as pointed out in the Commission's recent workshop on grid-enhancing technologies,⁵ the requirements specific to the Order No. 1000⁶ planning processes have made the deployment of pilot projects more challenging. Specifically, as was pointed out by various witnesses, developers of innovative solutions (including DLR technology) may be reluctant to

² See, e.g., Comments of American Wind Energy Association, Docket No. AD19-15, at 2, 4 (Nov. 1, 2019) ("AWEA Comments"); Comments of WATT Coalition, Docket No. AD19-15, at 2 (Nov. 1, 2019) ("WATT Comments").

³ See Comments of PJM Interconnection, L.L.C., Docket No. AD19-15, at 1, 4-5 (Nov. 5, 2019).

⁴ Amended and Restated Operating Agreement of PJM Interconnection, L.L.C., Schedule 6, section 1.5.7(d)

⁵ See *Grid-Enhancing Technologies Workshop*, Docket No. AD19-19 (Nov. 5-6, 2019).

⁶ *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, 136 FERC ¶ 61,051 (2011), *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132, *order on reh'g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), *aff'd sub nom. S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014).

share proprietary solutions with potential competitors, such as non-incumbent transmission developers or incumbent transmission owners. As a result, there has been a decreased willingness by entities to engage in information sharing learned from pilot projects.

The Commission should invite further discussion about the role pilot programs could play in the identification of opportunities for DLR investments. The Commission should also use this opportunity to provide further clarity regarding Order No. 1000 in the context of DLRs and other grid enhancing technologies. For example, the Commission should clarify how, under Order No. 1000, pilot programs relating to DLRs (and other grid enhancing technologies) can be implemented. The Commission should also clarify the extent to which the upgrades to existing transmission owner facilities exception⁷ to Order No. 1000 applies to the deployment of grid enhancing technologies like DLRs.⁸

2. PJM Presently Reviews and Studies Facility Ratings Under Defined Circumstances.

Some commenters⁹ appear to suggest that PJM has no role in reviewing or studying transmission line ratings. This claim is not accurate. At present, PJM reviews ratings by, among other things, requiring load dump ratings to be at least 3 percent higher than emergency ratings. This 3 percent margin enhances operational awareness so that PJM can prepare for a possible load dump rating operation where a thermal overload exceeds its emergency rating and approaches the load dump rating. In addition, when a transmission owner submits a revised

⁷ See, e.g., Amended and Restated Operating Agreement of PJM Interconnection, L.L.C., Schedule 6, section 1.5.8(l) (requiring PJM to designate a project that is an upgrade to an existing transmission facility to the transmission owner who owns the facility).

⁸ See Testimony of Craig Glazer, *Grid-Enhancing Technologies Workshop*, Docket No. AD19-19, at 5 (Nov. 6, 2019).

⁹ See, e.g., Monitoring Analytics Comments at 4-5. Although beyond the scope of this docket, to the extent PJM's Market Monitoring Unit has functions and responsibilities, those are set forth in PJM's Open Access Transmission Tariff, Attachment M.

facility rating that has increased or decreased by more than 10 percent compared to its current rating, PJM performs a manual rating approval to check the requested rating change. Moreover, where a transmission owner makes a large number of facility rating updates due to changes in the transmission owner's ratings methodology, PJM will perform operational studies with the revised ratings to identify potential reliability issues. All identified reliability issues will be mitigated before the revised ratings will be implemented in the real-time system. While PJM's review of a transmission owner's line rating is limited, it is not accurate to claim that PJM has no review or study role as to a transmission owner's transmission line ratings.

II. CONCLUSION

PJM thanks the Commission for this opportunity to submit reply comments in this matter.

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