



# PJM TOP/TO Relationship Compliance Reporting Process

TOA-AC

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- PJM NERC-Registered Transmission Operator (TOP)
- Member Transmission Owners (TOs) NERC-Registered TO
  - Member TOs are delegated a variety of TOP-related tasks
    - Tasks outlined in TOP/TO Matrix – updated regularly
    - PJM governing agreements (CTOA, OA, RAA) provide authority
  - PJM remains primarily responsible to RF/NERC for all TOP standards
    - OA Schedule 11 provides for allocation of resulting penalties if required

- PJM remains primarily responsible for TOP standard compliance
  - Issues identified during triennial BA/RC/TOP audit
  - Potential violations detected during PJM audits of TOs
  - Self-identified issues
- PJM is the primary interface with the regulator prior to TO intervention
  - Self-report
  - Mitigation plans

- RF Issues Notice of Preliminary Screen to PJM
- PJM requests RF determination of responsibility
  - NERC CMEP – Appendix 4C, Section 5.11
  - Copy of request provided to TO
- PJM issues notification to TO, requesting participation in proceeding
  - OA Schedule 11, Section 1.3
- RF grants intervention
  - Parties must execute NDA
- Importantly – Responsibility determined regardless of TO participation

- Timeliness
  - Discuss issue with PJM compliance as soon as possible
- Collaboration
  - Open and direct communications
- Responsiveness
  - Data requests
  - Dialogue

