

# **IMM Proposed Compliance Timelines**

**MRC- June 28, 2012**

## IMM PROPOSED TIMELINES

### Item 1: RPM Unit-Specific Market Seller Offer Caps

Entity	Milestone Activity (X = Date RPM Auction Window Opens)	IMM Compliance Deadlines
Seller	Submits data and supporting documentation necessary for calculating offer caps, including support for use of retirement default ACR	X – 120 days
IMM	Communicates offer caps to Seller through RPM/ACR system	X – 90 days
Seller	Affirms IMM calculated offer cap or communicates lowest calculated offer cap to which it agrees to commit	X – 80 days
PJM	PJM makes determination of whether the level of Sell Offer Cap is compliant with the tariff	X – 60 days
PJM	RPM Auction commences	X

**Item 5: RPM EFORd Exceptions BRA 1<sup>st</sup> and 2<sup>nd</sup> IAs**

Entity	Milestone Activity (X = Date RPM Auction Window Opens)	IMM Compliance Deadlines
Seller	Submits EFORd data and notifies IMM if Seller requests exception (EFORd exceeding Sell Offer EFORd) and provides supporting documentation	X – 120 days
IMM	Reviews submitted EFORd and exception request and provides EFORd value acceptable to IMM	X – 90 days
IMM/Seller	Affirms IMM EFORd exception value or communicates highest EFORd value to which it agrees to commit	X – 80 days
PJM	PJM makes determination of whether the level of EFORd is compliant with the tariff	X – 60 days
PJM	RPM Auction commences	X

**Item 5 (Cont'd): RPM EFORd Exceptions 3<sup>rd</sup> IA**

<b>Entity</b>	<b>Milestone Activity (X = Date RPM Auction Window Opens)</b>	<b>IMM Compliance Deadlines 3<sup>rd</sup> IA</b>
Seller	Submits EFORd data and notifies IMM if Seller requests exception (EFORd exceeding Sell Offer EFORd) and provides supporting documentation	X – 50 days
IMM	Reviews submitted EFORd and exception request and provides EFORd value acceptable to IMM	X – 35 days
IMM/Seller	Affirms IMM EFORd exception value or communicates highest EFORd value to which it agrees to commit	X – 30 days
PJM	PJM makes determination of whether the level of EFORd is compliant with the tariff	X – 20 days
PJM	RPM Auction commences	X

**Item 8: RPM Mitigation of Planned Capacity Resources**

<b>Entity</b>	<b>Milestone Activity</b> (X = Date RPM Auction Window Opens <sup>1</sup> )	<b>IMM Compliance Deadlines</b>
PJM	RPM Auction period commences	X
PJM	RPM Auction period closes	X + 4 days
IMM	Notifies Seller and PJM if offer found non-competitive	X + 7 days
PJM	Notifies Seller and IMM if offer is rejected	X + 8 days
Seller	Resubmits revised offer	X + 10 days

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<sup>1</sup> We assume that the RPM Auction commences on a Monday and closes on a Friday, consistent with current practice.

**Item 9: Black Start Service Revenue Requirements**

Entity	Milestone Activity	IMM Compliance Deadlines
Seller	Submit Black Start Service (BSS) revenue requirement data	May 3 (or first business day of May)
IMM	Reviews submitted BSS revenue requirement data and provides BSS values acceptable to IMM	May 14
Seller	Affirms BSS values to which it agrees or communicates lowest BSS values to which it agrees to commit	May 21
PJM	PJM makes determination of whether BSS values comply with the tariff	June 1 <sup>2</sup>

<sup>2</sup> 4 days in advance of effective date

### Item 10: Monthly Determination of Frequently Mitigated Units

Entity	Milestone Activity	IMM Compliance Deadlines
IMM	IMM notifies resource and PJM of FMU/AU status of resource	21 <sup>st</sup> day of the month <sup>3</sup>

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<sup>3</sup> This assumes that PJM Settlements has finalized required input data by the 5<sup>th</sup> business day of the month.

**Item 11: Parameter Limited Schedules**

<b>Entity</b>	<b>Milestone Activity</b>	<b>IMM Compliance Deadlines</b>
Seller	Seller requests exception to PJM and IMM (Current tariff provides for PJM to pass exception request to IMM)	February 28
IMM	IMM notifies PJM and Seller of approved PLS value	March 15
Seller	Affirms IMM PLS value or communicates PLS value to which it agrees to commit	March 20
PJM	PJM shall evaluate request for exception, and provide PLS value or approval of Seller's value to Seller and IMM	March 30



## Item 12: Minimum Offer Price Rule

Entity	Milestone Activity	IMM Compliance Deadlines
Seller	Submits request and documentation for unit specific MOPR exemption	X – 120
IMM	IMM notifies PJM and Seller of approved MOPR value	X – 90
Seller	Affirms IMM MOPR value or communicates highest MOPR value to which it agrees to commit	X – 80
PJM	PJM makes determination of whether MOPR value complies with the tariff	X – 65
PJM	RPM Auction commences	X