

**GDECS - Proposed Clean-Up, Clarification and Corrections to Governing Documents  
For Discussion at GDECS April 29, 2021**

	Agreement, Attachment, Section, Title	Current Language	Proposed Revisions	Rationale
1.	Tariff, Part I (Definitions)  Operating Agreement, Section 1 (Definitions)	Various	No substantive revisions.	<p><b>INCLUDED IN CHART FOR INFORMATIONAL PURPOSES ONLY. NO VOTE REQUIRED.</b></p> <p>PJM proposes to submit a clean-up filing to reincorporate revisions that FERC has previously accepted but which are not reflected in the posted versions of the governing documents. This results when multiple filings are submitted in the same section, the first filing requests an effective date that is prior to the effective date that the next filing is requesting, but we receive a FERC order for the second filing with the later effective date first. When we receive the FERC order accepting the first filing that has an earlier effective date, when the revisions from the first filing are merged in eTariff, it deletes the revisions from the second filing with the later effective date due to the design of the eTariff software.</p> <p>Docket Nos. for which revisions need to be reincorporated:</p>

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				<ul style="list-style-type: none"> <li>• ER18-1314 (MOPR)</li> <li>• EL19-58 (Reserve)</li> <li>• ER19-105 (VRR)</li> <li>• ER19-469 (ESR Compliance)</li> <li>• ER19-945 (FTR)</li> <li>• ER19-744-000 (GDECS)</li> <li>• ER19-1958 (Order 845)</li> <li>• ER20-1336 (Confidentiality)</li> <li>• ER20-1451 (Credit)</li> <li>• ER20-2799-000 (GDECS)</li> <li>• ER21-1211 (Surety Bonds) – if accepted before filing is submitted</li> <li>• ER21-1591(Real Time Market Values) – if accepted before filing is submitted</li> <li>• Any other filing for which revisions were accepted by FERC but were later removed due to the limitations of the eTariff software</li> </ul> <p>To further address this issue, PJM plans to recollate its eTariff definition sections to break them into smaller portions to reduce the number of clean-up filings we have to make in order to ensure all revisions that have been accepted by FERC are reflected</p>

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				<p>in the posted versions of the governing documents.</p> <p>None of this requires PJM to make any wording changes to the governing documents that have not already been approved by FERC. These filings will merely incorporate those already accepted revisions back into the governing documents.</p>
2.	Tariff, Schedule 6A, section 18	<p>“12-Month Forward Strip” is the average of forward prices for the fuel burned in the Black Start Unit traded the first Business Day on or following May 1.</p> <p>“Bond rate” is the value determined with reference to the Moody's Utility Index for bonds rated Baa1 reported the first Business Day on or following May 1.</p>	<p>“12-Month Forward Strip” is the average of forward prices for the fuel burned in the Black Start Unit traded the first Business Day on or following <del>April</del> <u>May</u> 1.</p> <p>“Bond rate” is the value determined with reference to the Moody's Utility Index for bonds rated Baa1 reported the first Business Day on or following <del>April</del> <u>May</u> 1.</p>	<p>PJM proposes to amend the Tariff. Schedule 6A, section 18 May 1 due date to April 1, for the 12-Month Forward Strip and Moody Bond Rate. to facilitate the May 3 due date for generators to submit their revenue requirements to the Market Monitor and PJM for the Black Start Service annual review of and changes to revenue requirement. This change is needed to address those years when May 1 falls on a Saturday which does not leave sufficient time for generators to submit their revenue requirements by close of business on May 3 in accordance with section 17A.</p>

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3.	Operating Agreement, Schedule 2, section 6.1(a)	The Market Seller ceased submitting the non-compliant offer either prior to, or upon notification from PJM, or the Market Seller reports such error to PJM after ceasing submission of the non-compliant cost-based offer then the penalty calculation will use the average hourly MWh and LMP for each hour of the day across the non-compliant period, as shown in the equation below. For the purposes of this equation, the non-compliant period is defined as the first hour for which the non-compliant offer was first submitted through the earlier of: a) the last hour for which the non-compliant offer was submitted; or b) notification of the non-compliant offer from PJM.	The Market Seller ceased submitting the non-compliant offer either prior to, or upon notification from PJM, or the Market Seller reports such error to PJM after ceasing submission of the non-compliant cost-based offer then the penalty calculation will use the average hourly MWh and LMP for each hour of the day across the non-compliant period, as shown in the equation below. For the purposes of this equation, the non-compliant period is defined as the first hour <u>of the Operating Day</u> for which the non-compliant offer was first submitted through the earlier of: a) the last hour <u>of the Operating Day</u> for which the non-compliant offer was submitted; or b) notification of the non-compliant offer from PJM.	This clarification makes clear that the non-compliance period is for a minimum of one Operating Day, consistent with the equation in this section, as well as the explicit language in Operating Agreement, Schedule 2, section 6.1(c) that “penalties will be assessed for no less than one (1) Operating Day.”

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4.	<p><del>Operating Agreement Tariff</del>, Attachment DD, section 5.11(e)</p>	<p>After conducting the Reliability Pricing Model Auctions, PJM will post the results of each auction as soon thereafter as possible, including any adjustments to PJM Region or LDA Reliability Requirements to reflect Price Responsive Demand with a PRD Reservation Price equal to or less than the applicable Base Residual Auction clearing price. The posted results shall include graphical supply curves that are (a) provided for the entire PJM Region, (b) provided for any Locational Deliverability Area for which there are four (4) or more suppliers, and (c) developed using a formulaic approach to smooth the curves using a statistical technique that fits a smooth curve to the underlying supply curve data while ensuring that the point of intersection between supply and demand curves is at the market clearing price.</p> <p>If PJM discovers an error in the initial posting of auction results for a particular Reliability Pricing Model Auction, it shall notify Market Participants of the error as soon as possible after it is found, but in no event later than 5:00 p.m. of the fifth Business Day following the initial publication of the results of the auction. After this initial notification, if PJM determines it is necessary to post modified results, it shall provide notification of its intent to do so, together with all available supporting documentation, by no later than 5:00 p.m. of the seventh Business Day following the initial publication of the results of the auction. Thereafter, PJM must post on its Web site any corrected auction results by no later than 5:00 p.m. of the tenth Business Day following the initial publication of the results of the auction. Should any of the above deadlines pass without the associated action on the part of the Office of the Interconnection, the originally posted results will be considered final. Notwithstanding the foregoing, the deadlines set forth above shall not apply if the referenced auction results are under publicly noticed review by the FERC.</p>	<p>After conducting the Reliability Pricing Model Auctions, PJM will post the results of each auction as soon thereafter as possible, including any adjustments to PJM Region or LDA Reliability Requirements to reflect Price Responsive Demand with a PRD Reservation Price equal to or less than the applicable Base Residual Auction clearing price. The posted results shall include graphical supply curves that are (a) provided for the entire PJM Region, (b) provided for any Locational Deliverability Area for which there are four (4) or more suppliers, and (c) developed using a formulaic approach to smooth the curves using a statistical technique that fits a smooth curve to the underlying supply curve data while ensuring that the point of intersection between supply and demand curves is at the market clearing price.</p> <p>If PJM discovers an <u>potential</u> error in the initial posting of auction results for a particular Reliability Pricing Model Auction, it shall notify Market Participants <del>of the error</del> as soon as possible after it is found, but in no event later than 5:00 p.m. of the fifth Business Day following the initial publication of the results of the auction. After this initial notification, if PJM determines it is necessary to post modified results, it shall provide notification of its intent to do so, <del>together with all available supporting documentation</del> <u>along with a description detailing the cause and scope of the error</u>, by no later than 5:00 p.m. of the seventh Business Day following the initial publication of the results of the auction. <u>The provided description will not contain information that is market sensitive or confidential</u>. Thereafter, PJM must post on its Web site any corrected auction results by no later than 5:00 p.m. of the tenth Business Day following the initial publication of the results of the auction. Should any of the above deadlines pass without the associated action on the part of the Office of the Interconnection, the originally posted results will be considered final.</p> <p><sup>5</sup> Notwithstanding the foregoing, the deadlines set forth above shall not apply if the referenced auction results are under publicly noticed review by the FERC.</p>	<p>The current language in the OA/Tariff states that PJM will post “all available supporting documentation,” which PJM cannot do for confidentiality reasons.</p> <p>These revisions align with PJM’s practice of providing relevant information about LMP repostings for the different markets. <i>See also Monterey MA, LLC v. PJM Interconnection, L.L.C.</i>, 165 FERC ¶ 61,201 at P 45 (2018) (“A reasonable, common sense interpretation of “all available supporting documentation” requires PJM to provide sufficient data or documentation to evidence its reason for the price correction.”).</p>

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5.	<p><del>Operating Agreement Tariff, Attachment K-Appendix, section 7.1A.2; Operating Agreement, Schedule 1, section 7.1A.2</del></p>	<p>The long-term Financial Transmission Rights auction process shall consist of five rounds. The first round shall be conducted by the Office of the Interconnection approximately 11 months prior to the start of the three Planning Period term covered by the relevant long-term Financial Transmission Rights auction. The second round shall be conducted approximately 2 months after the first round. The third round shall be conducted approximately 2 months after the second round. The fourth round shall be conducted approximately 2 months after the third round, and the fifth round shall be conducted approximately 3 months after the fourth round. In each round 20 percent of total capacity available in the long-term Financial Transmission Rights auction shall be offered for sale. Eligible entities may submit bids to purchase and offers to sell Financial Transmission Rights at the start of the bidding period in each round. The bidding period shall be three Business Days ending at 5:00 p.m. on the last day. PJM performs the Financial Transmission Rights auction clearing analysis for each round and posts the auction results on the market user interface within five Business Days after the close of the bidding period for each round unless circumstances beyond PJM's control prevent PJM from meeting the applicable deadline. Under such circumstances, PJM will post the auction results at the earliest possible opportunity. If the Office of the Interconnection discovers an error in the results posted for a long-term Financial Transmission Rights auction, the Office of the Interconnection shall notify Market Participants of the error as soon as possible after it is found, but in no event later than 5:00 p.m. of the Business Day immediately following the initial publication of the results for that auction. After this initial notification, if the Office of the Interconnection determines it is necessary to post modified auction results, it shall provide notification of its intent to do so, together with</p>	<p>The long-term Financial Transmission Rights auction process shall consist of five rounds. The first round shall be conducted by the Office of the Interconnection approximately 11 months prior to the start of the three Planning Period term covered by the relevant long-term Financial Transmission Rights auction. The second round shall be conducted approximately 2 months after the first round. The third round shall be conducted approximately 2 months after the second round. The fourth round shall be conducted approximately 2 months after the third round, and the fifth round shall be conducted approximately 3 months after the fourth round. In each round 20 percent of total capacity available in the long-term Financial Transmission Rights auction shall be offered for sale. Eligible entities may submit bids to purchase and offers to sell Financial Transmission Rights at the start of the bidding period in each round. The bidding period shall be three Business Days ending at 5:00 p.m. on the last day. PJM performs the Financial Transmission Rights auction clearing analysis for each round and posts the auction results on the market user interface within five Business Days after the close of the bidding period for each round unless circumstances beyond PJM's control prevent PJM from meeting the applicable deadline. Under such circumstances, PJM will post the auction results at the earliest possible opportunity. If the Office of the Interconnection discovers <del>a</del> <b>potential</b> error in the results posted for a long-term Financial Transmission Rights auction, the Office of the Interconnection shall notify Market Participants <del>of the error</del> as soon as possible after it is found, but in no event later than 5:00 p.m. of the Business Day immediately following the initial publication of the results for that auction. After this initial notification, if the Office of the Interconnection determines it is necessary to post modified auction results, it shall provide notification of its intent to do so, <del>together with</del></p>	<p>The current language in the OA/Tariff states that PJM will post “all available supporting documentation,” which PJM cannot do for confidentiality reasons.</p> <p>These revisions align with PJM's practice of providing relevant information about LMP repostings for the different markets. <i>See also Monterey MA, LLC v. PJM Interconnection, L.L.C.</i>, 165 FERC ¶ 61,201 at P 45 (2018) (“A reasonable, common sense interpretation of “all available supporting documentation” requires PJM to provide sufficient data or documentation to evidence its reason for the price correction.”).</p>

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		<p>all available supporting documentation, by no later than 5:00 p.m. of the second Business Day following the initial publication of prices for that auction. Thereafter, the Office of the Interconnection must post the corrected prices by no later than 5:00 p.m. of the fourth calendar day following the initial publication of prices in the auction. Should any of the above deadlines pass without the associated action on the part of the Office of the Interconnection, the originally posted results will be considered final. Notwithstanding the foregoing, the deadlines set forth above shall not apply if the referenced auction results are under publicly noticed review by the FERC.</p>	<p><del>all available supporting documentation along with a description detailing the cause and scope of the error</del>, by no later than 5:00 p.m. of the second Business Day following the initial publication of prices for that auction. <del>The provided description will not contain information that is market sensitive or confidential</del>. Thereafter, the Office of the Interconnection must post the corrected prices by no later than 5:00 p.m. of the fourth calendar day following the initial publication of prices in the auction. Should any of the above deadlines pass without the associated action on the part of the Office of the Interconnection, the originally posted results will be considered final. Notwithstanding the foregoing, the deadlines set forth above shall not apply if the referenced auction results are under publicly noticed review by the FERC.</p>	
6.	<p><del>Operating Agreement Tariff, Attachment K-Appendix, section 7.3.7; Operating Agreement, Schedule 1, section 7.3.7</del></p>	<p>Within two (2) Business Days after the close of the bid and offer period for an annual Financial Transmission Rights auction round, and within five (5) Business Days after the close of the bid and offer period for a monthly Financial Transmission Rights auction, the Office of the Interconnection shall post the winning bidders, the megawatt quantity, the term and the receipt and delivery points for each Financial Transmission Right awarded in the auction and the price at which each Financial Transmission Right was awarded unless circumstances beyond PJM's control prevent PJM from meeting the applicable deadline. Under such circumstances, PJM will post the auction results at the earliest possible opportunity. The Office of the Interconnection shall not disclose the price specified in any bid to purchase or the reservation price specified in any offer to sell. If the Office of the Interconnection discovers an error in the results posted for a Financial Transmission Rights auction (or a given round of the annual Financial Transmission Rights auction), the Office of the Interconnection shall notify Market Participants of the error as soon as</p>	<p>Within two (2) Business Days after the close of the bid and offer period for an annual Financial Transmission Rights auction round, and within five (5) Business Days after the close of the bid and offer period for a monthly Financial Transmission Rights auction, the Office of the Interconnection shall post the winning bidders, the megawatt quantity, the term and the receipt and delivery points for each Financial Transmission Right awarded in the auction and the price at which each Financial Transmission Right was awarded unless circumstances beyond PJM's control prevent PJM from meeting the applicable deadline. Under such circumstances, PJM will post the auction results at the earliest possible opportunity. The Office of the Interconnection shall not disclose the price specified in any bid to purchase or the reservation price specified in any offer to sell. If the Office of the Interconnection discovers <del>a</del> <b>potential</b> error in the results posted for a Financial Transmission Rights auction (or a given round of the annual Financial Transmission Rights auction), the Office of the Interconnection shall notify Market Participants <del>of</del></p>	<p>The current language in the OA/Tariff states that PJM will post "all available supporting documentation," which PJM cannot do for confidentiality reasons.</p> <p>These revisions align with PJM's practice of providing relevant information about LMP repostings for the different markets. See also <i>Monterey MA, LLC v. PJM Interconnection, L.L.C.</i>, 165 FERC ¶ 61,201 at P 45 (2018) ("A reasonable,</p>

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7.	<p><del>Operating Agreement</del> Tariff, Attachment K-Appendix, section 7.4.2(a); <del>Operating Agreement, Schedule 1, section 7.4.2(a)</del></p>	<p>Prior to the end of each PJM Planning Period an annual allocation of Auction Revenue Rights for the next PJM Planning Period shall be performed using a two stage allocation process. Stage 1 shall consist of stages 1A and 1B, which shall allocate ten year and annual Auction Revenue Rights, respectively, and stage 2 shall allocate annual Auction Revenue Rights. The Auction Revenue Rights allocation process shall be performed in accordance with Sections 7.4 and 7.5 hereof and the PJM Manuals.</p> <p>With respect to the allocation of Auction Revenue Rights, if the Office of the</p>	<p>Prior to the end of each PJM Planning Period an annual allocation of Auction Revenue Rights for the next PJM Planning Period shall be performed using a two stage allocation process. Stage 1 shall consist of stages 1A and 1B, which shall allocate ten year and annual Auction Revenue Rights, respectively, and stage 2 shall allocate annual Auction Revenue Rights. The Auction Revenue Rights allocation process shall be performed in accordance with Sections 7.4 and 7.5 hereof and the PJM Manuals.</p> <p>With respect to the allocation of Auction Revenue Rights, if the Office of the</p>	<p>The current language in the OA/Tariff states that PJM will post “all available supporting documentation,” which PJM cannot do for confidentiality reasons.</p> <p>These revisions align with PJM’s practice of providing relevant</p>



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		<p>Interconnection discovers an error in the allocation, the Office of the Interconnection shall notify Market Participants of the error as soon as possible after it is found, but in no event later than 5:00 p.m. of the Business Day following the initial publication of allocation results. After this initial notification, if the Office of the Interconnection determines that it is necessary to post modified allocation results, it shall provide notification of its intent to do so, together with all available supporting documentation, by no later than 5:00 p.m. of the second Business Day following the publication of the initial allocation. Thereafter, the Office of the Interconnection must post any corrected allocation results by no later than 5:00 p.m. of the fourth calendar day following the initial publication. Should any of the above deadlines pass without the associated action on the part of the Office of the Interconnection, the originally posted results will be considered final. Notwithstanding the foregoing, the deadlines set forth above shall not apply if the referenced allocation is under publicly noticed review by the FERC.</p>	<p>Interconnection discovers <del>an</del> <b>potential</b> error in the allocation, the Office of the Interconnection shall notify Market Participants <del>of the error</del> as soon as possible after it is found, but in no event later than 5:00 p.m. of the Business Day following the initial publication of allocation results. After this initial notification, if the Office of the Interconnection determines that it is necessary to post modified allocation results, it shall provide notification of its intent to do so, <del>together with all available supporting documentation along with a description detailing the cause and scope of the error,</del> by no later than 5:00 p.m. of the second Business Day following the publication of the initial allocation. <b>The provided description will not contain information that is market sensitive or confidential.</b> Thereafter, the Office of the Interconnection must post any corrected allocation results by no later than 5:00 p.m. of the fourth calendar day following the initial publication. Should any of the above deadlines pass without the associated action on the part of the Office of the Interconnection, the originally posted results will be considered final. Notwithstanding the foregoing, the deadlines set forth above shall not apply if the referenced allocation is under publicly noticed review by the FERC.</p>	<p>information about LMP repostings for the different markets. <i>See also Monterey MA, LLC v. PJM Interconnection, L.L.C.</i>, 165 FERC ¶ 61,201 at P 45 (2018) (“A reasonable, common sense interpretation of “all available supporting documentation” requires PJM to provide sufficient data or documentation to evidence its reason for the price correction.”).</p>
8.	<p><del>Operating Agreement</del> <b>Tariff</b>, Attachment K-Appendix, section 1.10.8(e); <del>Operating Agreement</del>, <b>Schedule 1</b>, section 1.10.8(e)</p>	<p>If the Office of the Interconnection discovers an error in prices and/or cleared quantities in the Day-ahead Energy Market or Day-ahead Ancillary Services Markets, or the Real-time Energy Market or Real-time Ancillary Services Markets after it has posted the results for these markets on its Web site, the Office of the Interconnection shall notify Market Participants of the error as soon as possible after it is found, but in no event later than 12:00 p.m. of the second Business Day following the Operating Day for the Real-time Energy Market and Real-time Ancillary Services Markets, and no later than 5:00 p.m. of the second Business Day following the initial publication of the results for</p>	<p>If the Office of the Interconnection discovers <del>an</del> <b>potential</b> error in prices and/or cleared quantities in the Day-ahead Energy Market or Day-ahead Ancillary Services Markets, or the Real-time Energy Market or Real-time Ancillary Services Markets after it has posted the results for these markets on its Web site, the Office of the Interconnection shall notify Market Participants <del>of the error</del> as soon as possible after it is found, but in no event later than 12:00 p.m. of the second Business Day following the Operating Day for the Real-time Energy Market and Real-time Ancillary Services Markets, and no later than 5:00 p.m. of the second Business Day following the initial publication of the</p>	<p>The current language in the OA/Tariff states that PJM will post “all available supporting documentation,” which PJM cannot do for confidentiality reasons.</p> <p>These revisions align with PJM’s practice of providing relevant</p>

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		<p>the Day-ahead Energy Market and Day-ahead Ancillary Services Markets. After this initial notification, if the Office of the Interconnection determines it is necessary to post modified results, it shall provide notification of its intent to do so, together with all available supporting documentation, by no later than 5:00 p.m. of the fifth Business Day following the Operating Day for the Real-time Energy Market and Real-time Ancillary Services Markets, and no later than 5:00 p.m. of the fifth Business Day following the initial publication of the results in the Day-ahead Energy Market and Day-ahead Ancillary Services Markets. Thereafter, the Office of the Interconnection must post on its Web site the corrected results by no later than 5:00 p.m. of the tenth calendar day following the Operating Day for the Day-ahead Energy Market, Real-time Energy Market, and Day-ahead Ancillary Services Markets, and Real-time Ancillary Service Markets. Should any of the above deadlines pass without the associated action on the part of the Office of the Interconnection, the originally posted results will be considered final. Notwithstanding the foregoing, the deadlines set forth above shall not apply if the referenced market results are under publicly noticed review by the FERC.</p>	<p>results for the Day-ahead Energy Market and Day-ahead Ancillary Services Markets. After this initial notification, if the Office of the Interconnection determines it is necessary to post modified results, it shall provide notification of its intent to do so, <del>together with all available supporting documentation</del> <u>along with a description detailing the cause and scope of the error</u>, by no later than 5:00 p.m. of the fifth Business Day following the Operating Day for the Real-time Energy Market and Real-time Ancillary Services Markets, and no later than 5:00 p.m. of the fifth Business Day following the initial publication of the results in the Day-ahead Energy Market and Day-ahead Ancillary Services Markets. <u>The provided description will not contain information that is market sensitive or confidential.</u> Thereafter, the Office of the Interconnection must post on its Web site the corrected results by no later than 5:00 p.m. of the tenth calendar day following the Operating Day for the Day-ahead Energy Market, Real-time Energy Market, and Day-ahead Ancillary Services Markets, and Real-time Ancillary Service Markets. Should any of the above deadlines pass without the associated action on the part of the Office of the Interconnection, the originally posted results will be considered final. Notwithstanding the foregoing, the deadlines set forth above shall not apply if the referenced market results are under publicly noticed review by the FERC.</p>	<p>information about LMP repostings for the different markets. <i>See also Monterey MA, LLC v. PJM Interconnection, L.L.C.</i>, 165 FERC ¶ 61,201 at P 45 (2018) (“A reasonable, common sense interpretation of “all available supporting documentation” requires PJM to provide sufficient data or documentation to evidence its reason for the price correction.”).</p>