



Critical Infrastructure Stakeholder Oversight

First Read of Avoidance M14B and M14F Language

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Planning Committee
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Summary of changes to PJM Manual 14B

M14B: PJM Region Transmission Planning Process

- Section 1.4.1.8: RTEP Process Key Components
 - Added new subsection with overview of process related to maintaining reliability
- Section 2.1: Transmission Planning
 - Added Avoidance to overview of Transmission Planning activities
- Section 2.9: Resilience (New)
 - Detailed resilience analysis process including specific criteria



Summary of changes to PJM Manual 14F

M14F: Competitive Planning Process

- Section 4.1.1: Purpose of a Proposal Window
 - Added resilience to list of PJM Reliability criteria tests evaluated in a proposal window
- Section 8.1.2: Detailed proposal review
 - Added resilience to PJM reliability requirements
- Section 8.2.1: Primary Considerations
 - Added resilience to primary consideration of project evaluation

M14F: Competitive Planning Process

- Section 8.1.1: Initial Review and Screening
 - Added new text detailing process by which PJM may modify a proposal submitted through the competitive planning process
 - Includes examples of proposal modifications that would be deemed “limited in scope” and those which are not “limited in scope”
 - Modifications required to a proposal beyond those determined to be “limited in scope” by PJM would not continue to be considered as proposals to be evaluated for construction, ownership, and operation by the proposing entity

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Critical Infrastructure Stakeholder Oversight



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Appendix



PJM Package - Avoidance



PJM Avoidance Package Proposal – Design Component #12

#	Design Components	A – PJM
12a	Resilience Driver/Criteria Analysis	PJM performs RTEP Resilience criteria analysis utilizing the cascading trees tool.
#	Design Components	A – PJM
12b	Metrics/Measurements/Factors.	Consistent with RTEP Resilience criteria analytical methods incorporated in cascading trees tool software.
#	Design Components	A – PJM
12c	Sensitivity Testing	Consistent with analysis methods as indicated in the resilience criteria analysis described above.

- PJM performs RTEP resilience analysis using cascading trees tool (Proprietary software, not shared with stakeholders)



PJM Avoidance Package Proposal – Design Component #13

#	Design Components	A – PJM
13a	Communication Procedures	- PJM to communicate failure of project to meet resilience criteria requirements - If a project proposal violates PJM's Resilience criteria, PJM to provide verbal update with limited/restricted level of information to entity who submitted the project proposal through competitive window. Information limited to analytical results only.
#	Design Components	A – PJM
13b	Confidentiality	If project proposal violates PJM's Resilience criteria, PJM shall provide limited/restricted level of information to project proposal.

- If a proposed RTEP project fails resilience criteria requirements, PJM will communicate failure and analytical results to proposing entity only.
 - Information limited so that facility of concern is not disclosed



PJM Avoidance Package Proposal – Design Component #13

#	Design Components	A – PJM
13c	CEII	Status Quo
#	Design Components	A – PJM
13d	Re-evaluation Process	Not Applicable

- If a proposed project fails resilience criteria, no opportunity for re-evaluation



PJM Avoidance Package Proposal – Design Component #14

#	Design Components	A – PJM
14	Transparency	<ul style="list-style-type: none">- PJM communicate failure of project to meet RTEP Resilience criteria requirements- If a project proposal violates PJM's Resilience criteria, PJM shall provide limited/restricted level of information to entity proposing project through the competitive window.

- If a proposed RTEP project fails resilience criteria requirements, PJM will communicate failure and analytical results to proposing entity only.



PJM Avoidance Package Proposal – Design Component #15

#	Design Components	A – PJM
15	Competition	Limited to proposing entities ability to mitigate initial issue identified in competitive process. No opportunity to revise a proposal submitted through a competitive window once the window closes to address issues that trigger potential violations associated with the RTEP Resilience criteria.

- No impact to existing competitive process.



PJM Avoidance Package Proposal – Design Component #16

#	Design Components	A – PJM
16	Cost Allocation/Cost Recovery	Status Quo

- Resilience Driver under existing Reliability Criteria
- Follows existing cost allocation methodology



PJM Avoidance Package Proposal – Design Component #17a

#	Design Components	A – PJM
17a	Roles and Responsibilities – PJM	<ul style="list-style-type: none">- Performs RTEP Resilience criteria analysis with cascading trees tool- Communicates information in accordance with confidentiality requirements as described above. E.g., release limited/restricted level of information to proposing entity.

- PJM analysis allows monitoring RTEP activities
 - PJM avoidance analysis protects against the creation of future CIP-014 facilities.
 - Communication is restricted based on sensitivity associated with potential project impact



PJM Avoidance Package Proposal – Design Component #17b

#	Design Components	A – PJM
17b	Roles and Responsibilities – State Commissioners	Provide feedback consistent with the confidentiality provisions in the Operating Agreement

- Maintains processes consistent with current RTEP activates to eliminate any confusion



PJM Avoidance Package Proposal – Design Component #17c

#	Design Components	A – PJM
17c	Roles and Responsibilities – PJM Stakeholders	Status Quo with limited/restricted level of communications to entity proposing project triggering potential violations of PJM's RTEP Resilience criteria.

- Allows limited feedback to help stakeholders understand problems caused by proposed projects
- Prevent the release of information which is sensitive in nature and inconsistent with public disclosure



PJM Avoidance Package Proposal – Design Component #17d

#	Design Components	A – PJM
17d	Roles and Responsibilities – Asset Owners	Status quo with limited/restricted level of communications to entity proposing project triggering potential violation of PJM's RTEP Resilience criteria.

- Allows limited feedback to help stakeholders understand problems caused by proposed projects
- Prevent the release of information which is sensitive in nature and inconsistent with public disclosure