

PJM Interconnection, L.L.C.
FERC Order No. 1000 Further Compliance
Working Papers – Will Be Updated Periodically
June 21, 2013 Version 1.0

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
<p><i>(1,2,3) Effective Date and Transition:</i> Commission directed PJM to submit a compliance filing, that: (1) establishes a date certain indicating the start of the next full 12-month and 24-month planning cycle, during which PJM’s proposed revisions will be effective; or (2) provides an alternative proposed effective date to coincide with a full 12-month and 24-month planning cycle, and explains why the alternative proposed effective date is appropriate; and (3) provides further information regarding PJM’s transition to the revised regional transmission planning process, including an explanation of how PJM will evaluate transmission projects currently under consideration.. (March 22 Order at PP 32, 34).</p>	<p style="text-align: center;">None</p>	<p>Effective Date for Order No. 1000-related revisions: January 1, 2014.</p> <p>PJM will transition to the new process as follows: PJM will open proposal windows for Long-lead Projects and Economic-based Enhancements and Expansions after January 1, 2014. PJM will commence proposal windows for Short-term projects and Immediate-need Reliability Projects after the issuance of the Commission order accepting the July 22, 2013 compliance filing.</p> <p>PJM already has opened limited proposal windows for current projects. Certain entities already are submitting pre-qualification information and if prequalified will not have to resubmit pre-qualification application after January 1, 2014.</p> <p>Of course, these dates are contingent upon the finality of the FERC Order.</p>

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<p>(4) Comparability Principle: PJM proposes, in the PJM October 25 Filing, to remove sections 1.5.6(m), (n), (o), and (p) of Schedule 6 that the Commission relied on to conclude that PJM complied with the comparability principle. In its October 25 Filing, PJM does not explain how, absent the provisions it proposes to remove in its filing, it still complies with the comparability principle. Accordingly, the Commission directed PJM to explain how it will comply with the comparability principle absent those sections. (March 22 Order at P 53).</p>	<p>Still under consideration whether OA revisions are required.None.</p>	<p>PJM will explain that the provisions removed from 1.5.6 provided for stakeholders to propose alternative transmission solutions at the time that the solutions were presented to the PJM Board. Because under the sponsorship model, alternatives will not be permitted once the plan goes to the Board, these provisions are no longer applicable. However, the new procedures still allow for review and vetting of proposals through the stakeholder process. See e.g., OA, Schedule 6 Section 1.5.8(d). Furthermore, PJM still complies with the comparability principle because alternative solutions such as demand response and generation will be considered earlier in the process during the assumptions stage prior to posting the violations that are unresolved.</p>
<p>(5) Enrollment Process: Regarding PJM’s enrollment process, we note that, PJM indicates in its October 25 Filing that “[t]o participate in the PJM regional planning process, an entity must become a member of PJM.” This appears to be a misstatement by PJM. Consistent with the Order No. 890 planning principles, and with section 1.3(a) of Schedule 6, an entity does not have to become a member, or associate member, of PJM in order to participate in the regional transmission planning process. (March 22 Order at P 55).</p>	<p>None</p>	<p>PJM will clarify that an entity does not have to be a PJM member to participate in the regional transmission planning process, including submitting a proposal, but must be prepared to sign the CTOA, if its project is chosen to be included in the RTEP. See OA, Sch. 6 § 1.5.8(vii)</p>

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<p>(6) Definition of Public Policy Requirements: As proposed by PJM, the definition of “Public Policy Requirements” does not include <i>duly enacted laws or regulations passed by a local governmental entity, such as a municipal or county government</i>. Accordingly, the Commission directed PJM to revise its OA and OATT to include a definition of “Public Policy Requirements” that is consistent with the definition adopted in Order No. 1000. (March 22 Order at P 113).</p>	<p>OA (Definitions) 1.38B Public Policy Requirements “Public Policy requirements” shall refer to policies pursued by: <u>(a) state or federal entities, where such policies are reflected in duly enacted statutes or regulations, including but not limited to, state renewable portfolio standards and requirements under Environmental Protection Agency regulations; and (b) local governmental entities such as a municipal or county government, where such policies are reflected in duly enacted laws or regulations passed by the local governmental entity.</u></p>	

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<p>(7, 8) Public Policy – Assumptions Stage. Describe a process through which PJM will determine which public policy requirements identified by stakeholders at the assumption stage of the RTEP process will be incorporated into its transmission studies and thus which public policy requirements may result in transmission needs for which transmission solutions will be evaluated. Specifically, explain whether PJM will incorporate into its studies all public policy requirements identified by stakeholders or whether PJM will, out of this larger set of public policy requirements, select a subset of public policy requirements to incorporate. If PJM will select a subset, PJM must explain how its Tariff provides for a just and reasonable (P 115).</p> <p>The Commission also directed PJM to revise its tariff to (i) post on its website an explanation of those public policy requirements that PJM adopted at the assumptions stage; (ii) post on its website an explanation of why other public policy requirements introduced by stakeholders were not adopted; and (iii) clarify when in the RTEP process PJM will make such posting(s) (March 22 Order at P 116).</p>	<p>1.5.6(b) The Transmission Expansion Advisory Committee and the Subregional RTEP Committees shall each facilitate a minimum of one initial assumptions meeting to be scheduled at the commencement of the RTEP process. The purpose of the assumptions meeting shall be to provide an open forum to discuss the following: (i) the assumptions to be used in performing the evaluation and analysis of the potential enhancements and expansions to the Transmission Facilities (ii) Public Policy Requirements identified by the states for consideration in the Office of the Interconnection’s transmission planning analyses; (iii) Public Policy Objectives identified by stakeholders -for consideration in the Office of the Interconnection’s transmission planning analyses; (iii) the impacts of regulatory actions, projected changes in load growth, demand response resources, energy efficiency programs, price responsive demand, generation additions and retirements, market efficiency and other trends in the industry; and (iv) alternative sensitivity studies, modeling assumptions and scenario analyses proposed by the Committee participants. Prior to the initial assumptions meeting, Committee participants will be afforded the opportunity to provide input and submit suggestions regarding the information identified in items (i) through (iv) of this subsection. Following the assumptions meeting and prior to performing the evaluation and analyses, a range of assumptions to be used in the studies and scenario analyses shall be determined by the Office of the Interconnection shall determine the range of assumptions to be used in the studies and scenario analyses, based on, considering the advice and recommendations of the Transmission Expansion Advisory Committee and Subregional RTEP Committees and the validation of Public Policy Requirements and assessment and prioritization of Public Policy Objectives by the states through the ISAC. The Office of the Interconnection participants and shall be documented and publicly posted its determination for review. Such posting shall include an explanation of those Public Policy Requirements and Public Policy Objectives adopted at the assumptions stage to be used in performing the evaluation and analysis of the potential enhancements and expansions to the Transmission System and an explanation of why other Public Policy Requirements and Public Policy Objectives introduced by stakeholders at the assumptions stage were not adopted.</p>	<p>PJM will use its judgment based on (i) input provided by stakeholders; (ii) input from the states, including prioritization of which Public Policy Requirements and Public Policy Objectives they want evaluated and analyzed; and (iii) a thorough vetting of all input through the stakeholder process. In all cases, PJM will defer to the appropriate regulatory body as to what constitutes a valid interpretation of public policy requirements.</p> <p>In addition, for policy that may have an effect on PJM’s existing generation fleet, PJM will study it because PJM is mandated to take it into account for reliability. For all other policies, PJM will use the stakeholder process to identify which policies have impact and which have no impact on the transmission system and the need for additional capability. PJM will provide the stakeholder analysis to the states and ask them which policies, if any, they want PJM to analyze. Based on the analysis, PJM will develop solutions, provide the proposed solutions to the states and ask them what they want PJM to build.</p> <p>PJM will revise OA, Schedule 6, section 1.5.6(b) to: (i) post on its website an explanation of those public policy requirements that PJM adopted at the assumptions stage; (ii) post on its website an explanation of why other public policy requirements introduced by stakeholders were not adopted; and (iii) clarify when in the RTEP process PJM will make such posting(s)</p>

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<p>(9) Local Planning Process. The Commission found, that PJM does not address how the transmission-owning members of PJM have incorporated the requirements of Order No. 1000 addressing transmission needs driven by public policy requirements in their local transmission planning processes. The Commission directed PJM to explain how local transmission complies with the requirements of Order No. 1000 addressing transmission needs driven by Public Policy Requirements. (March 22 Order at P 123).</p>	<p>None.</p>	<p>PJM conducts regional and local planning simultaneously using the same study and evaluation processes.</p>
<p>(10) State Agreement Approach: Proposed language in OA Schedule 6 § 1.5.9 “does not identify which entity determines whether a Supplemental Project will be included in the RTEP as indicated in the State Agreement Approach, given that Supplemental Projects are “not subject to the PJM Board for approval.” The Commission directed PJM to indicate the entity that determines whether a Supplemental Project will be included in the RTEP.” (March 22 Order at P 145).</p>	<p>OA, Schedule 6 §1.5.9 State Agreement Approach. (a) State governmental entities authorized by their respective states, individually or jointly, may agree voluntarily to be responsible for the allocation of all costs of a proposed transmission expansion or enhancement that addresses state Public Policy Requirements identified or accepted by the state(s) in the PJM Region. <u>As determined by the authorized state governmental entities, s</u>Such transmission enhancements or expansions may be included in the recommended plan, <u>either</u> as a (i) Supplemental Project or (ii) state public policy project, which is a transmission enhancement or expansion, the costs of which will be recovered pursuant to a FERC-accepted cost allocation proposed by agreement of one or more states and voluntarily agreed to by those state(s). All costs related to a state public policy project or Supplemental Project included in the Regional Transmission Expansion Plan to address state Public Policy Requirements pursuant to this Section shall be recovered from customers in a state(s) in the PJM Region that agrees to be responsible for the projects. No such costs shall be recovered from customers in a state that did not agree to be responsible for such cost allocation. A state public policy project will be included in the Regional Transmission Expansion Plan for cost allocation purposes only if there is an associated FERC-accepted allocation permitting recovery of the costs of the state public policy project consistent with this Section.</p>	<p>PJM will further explain that states, or possibly other stakeholders, may propose the project to PJM based on Public Policy Requirements or Public Policy Objectives that were identified and the analysis of their impact. PJM will evaluate the project and inform the state whether any additional upgrades will be required to accommodate the state-proposed project. The state then will notify PJM whether to include the project in the RTEP. If the project is to be included in the RTEP, the state shall indicate (i) whether the project will be a Supplemental Project or state public policy project; and (ii) that the state will pay for the cost of the project and any additional upgrades to accommodate the project.</p>

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<p><i>(11) State Agreement Approach as a Supplemental Project.</i> PJM clarified in its Answer to the NJ BPU that a Supplemental Project is not included in the RTEP for purposes of cost allocation and that pursuant to the State Agreement Approach no costs for a state public policy project may be allocated to a state that does not agree to pay those costs. However, the Commission finds that PJM’s response does not adequately explain how a proposed transmission project addressing “transmission needs driven by Public Policy Requirements” identified in the local planning process could be included in the regional transmission plan. Thus, the Commission directed PJM to explain how proposed transmission projects addressing transmission needs driven by Public Policy Requirements identified in the local transmission planning process could be included in the regional plan, although not necessarily for purposes of cost allocation (March 22 Order at P 147).</p>	<p>None.</p>	<p>PJM conducts regional and local planning simultaneously using the same study and evaluation processes, including for Public Policy Requirements.</p>

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<p>(12, 13) Right of First Refusal: The Commission directed PJM to revise its OATT and Agreements to: (i) address any provision that could be read as supplying a federal right of first refusal for any type of transmission project that is selected in the regional transmission plan for purposes of cost allocation; (ii) that could be read as supplying a federal right of first refusal for transmission projects that are selected in the regional transmission plan for purposes of cost allocation. PJM must clarify these provisions so that they are consistent with Order No. 1000; namely, by removing or revising any provision that could be read as supplying a federal right of first refusal for any type of transmission project that is selected in the regional transmission plan for purposes of cost allocation. Moreover, such clarification must include revision to any provision that could purport to preclude the section 205 filing rights of nonincumbent utilities without their consent, in a manner inconsistent with Atlantic City.” (March 22 Order at PP 221-222). Commission further directed PJM to revise those provisions of its OATT and Agreements that lock nonincumbent transmission developers into market-based rates before they enter the regional transmission planning process. (March 22 Order at P 224).</p>	<p>OA, Schedule 6 § 1.5.7(k) (k) For each enhancement or expansion that is included in the recommended plan, the plan shall consider, based on the planning analysis: other input from participants, including any indications of a willingness to bear cost responsibility for such enhancement or expansion; and, when applicable, relevant projects being undertaken to ensure the simultaneous feasibility of Stage 1A ARRs, to facilitate Incremental ARRs pursuant to the provisions of Section 7.8 of Schedule 1 of this Agreement, or to facilitate upgrades pursuant to Parts II, III, or VI of the PJM Tariff, and designate one or more Transmission Owners or other entities to construct, own and, unless otherwise provided, finance the recommended transmission enhancement or expansion. To the extent that one or more Transmission Owners are designated to construct, own and/or finance a recommended transmission enhancement or expansion, the recommended plan shall designate the Transmission Owner that owns transmission facilities located in the Zone where the particular enhancement or expansion is to be located. Otherwise, any Any designation under this paragraph of one or more entities to construct, own and/or finance a recommended transmission enhancement or expansion shall also include a designation of partial responsibility among them. Nothing herein shall prevent any Transmission Owner or other entity designated to construct, own and/or finance a recommended transmission enhancement or expansion from agreeing to undertake its responsibilities under such designation jointly with other Transmission Owners or other entities.</p>	<p>PJM filed rehearing on this issue on April 22, 2013. Notwithstanding that rehearing request, PJM proposes to remove this provision as PJM believes it “could be read as supplying a right of first refusal.”</p>

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<p>(14) <i>Exceptions to ROFR –Clarify “Upgrade”:</i> Commission directed PJM to revise section 1.5.8(1)(i) of Schedule 6 to clarify and define the term “upgrade” and make any necessary conforming revisions to Schedule 6, its OATT and Agreements. (March 22 Order at P 227).</p>	<p>OA, Schedule 6, § 1.5.8(l)</p> <p>Transmission Owners Required to be the Designated Entity. Notwithstanding anything to the contrary in this Section 1.5.8, in all events, the Transmission Owner(s) in whose Zone(s) a <u>project proposed Short-term Project or Long-lead Project pursuant to Section 1.5.8(c) of this Schedule 6</u> is to be located will be the Designated Entity for the project, when the Short-term Project or Long-lead Project is: (i) <u>an upgrade to a Transmission Owner’s own Upgrade transmission facilities</u>; (ii) located solely within a Transmission Owner’s Zone and the costs of the project are allocated solely to the Transmission Owner’s Zone; <u>or</u> (iii) located solely within a Transmission Owner’s Zone and is not selected in the Regional Transmission Expansion Plan for purposes of cost allocation; <u>or (iv) proposed to be located on a Transmission Owner’s existing right of way and the project would alter the Transmission Owner’s use and control of its existing right of way under state law. Transmission Owner shall be the Designated Entity when required by state law, regulation or administrative agency order with regard to enhancements or expansions or portions of such enhancements or expansions located within that state.</u></p> <p>OA Definition</p> <p>1.46 {Reserved.} Transmission Owner Upgrade <u>“Transmission Owner Upgrade” shall mean an upgrade to a Transmission Owner’s own transmission facilities, which is an improvement to, addition to, or replacement of a part of, an existing facility and is not an entirely new transmission facility.</u></p>	<p>New definition of “Transmission Owner Upgrade” that is consistent with the Commission’s definition of “upgrade” in Order No. 1000-A P 426.</p>

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<p>(15, 16) Exceptions to ROFR – Rights of Way; State Law: The Commission found that PJM’s proposed language creating a Rights of Way and state law exemption created a new Right of First Refusal not permitted by Order No. 1000; therefore, the Commission requires PJM to “(1) remove the proposed language related to rights-of-way as detailed above; and (2) remove the proposed language related to designating an incumbent transmission owner as the Designated Entity when required by state law, regulation, or administrative agency order.” (March 22 Order at PP 229-231, 234).</p>	<p>1.5.8(l) Transmission Owners Required to be the Designated Entity. Notwithstanding anything to the contrary in this Section 1.5.8, in all events, the Transmission Owner(s) in whose Zone(s) a proposed Short-term Project or Long-lead Project is to be located will be the Designated Entity for the project, when the Short-term Project or Long-lead Project is: (i) an upgrade to a Transmission Owner’s own transmission facilities; (ii) located solely within a Transmission Owner’s Zone and the costs of the project are allocated solely to the Transmission Owner’s Zone; <u>or</u> (iii) located solely within a Transmission Owner’s Zone and is not selected in the Regional Transmission Expansion Plan for purposes of cost allocation; or (iv) proposed to be located on a Transmission Owner’s existing right of way and the project would alter the Transmission Owner’s use and control of its existing right of way under state law. Transmission Owner shall be the Designated Entity when required by state law, regulation or administrative agency order with regard to enhancements or expansions or portions of such enhancements or expansions located within that state.</p> <p>Still under consideration whether additional OA revisions are required.</p>	<p>In the March 22 Order, the Commission reiterated its view from Order Nos. 1000 and 1000-A that “it is not necessarily impermissible to consider the effect of the state regulatory process at appropriate points in the regional transmission planning process.” Moreover, “the Commission has identified points at which such consideration might be appropriate.” The Commission further stated that transmission providers “may consider “the particular strengths of either an incumbent transmission provider or a nonincumbent transmission developer during its evaluation.” (March 22 Order at P 232). Consistent with this precedent, PJM may consider the state regulatory process, including right of way issues, when it considers the ability to timely complete the project, and project development feasibility as well as other factors that may be relevant to a proposed project. (see OA Schedule 6, § 1.5.8(e) & (f).</p> <p>However, a state regulatory process or right of ways will not be used as ROFR exceptions.</p>

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<p>(17) Market Efficiency Projects: Commission directs PJM to clarify “what category in the transmission project proposal process (<i>i.e.</i>, Long-lead and/or Short-term Projects) a market efficiency project can be proposed and evaluated as in PJM’s proposed transmission project proposal process.” (March 22 Order at P 237).</p>	<p>OA Definitions</p> <p>1.7D Economic-based Enhancement or Expansion. “Economic-based Enhancement or Expansion” means an enhancement or expansion described in Section 1.5.7(b) (i) – (iii) of Schedule 6 of the Operating Agreement that is designed to relieve transmission constraints that have an economic impact.</p> <p>1.7A Designated Entity. AnThe entity, including an existing Transmission Owner or Nonincumbent Developer, designated by the Office of the Interconnection with the responsibility to construct, own, operate, maintain, and finance Immediate-need Reliability Projects, Short-term Projects, and Long-lead Projects, or Economic-based Enhancement or Expansion pursuant to Section 1.5.8 of Schedule 6 of this Agreement.</p> <p>1.19A Long-lead Project. A transmission enhancement or expansion with an in-service date more than five years from the year in which, pursuant to section 1.5.8(c) of this Schedule 6, the Office of the Interconnection posts the violations, system conditions, economic constraints, and/or Public Policy Requirements to be addressed by the enhancement or expansion.</p> <p>1.41A.01 Short-term Project</p> <p>A transmission enhancement or expansion with an in-service date of more than three years but no more than five years from the year in which, pursuant to section 1.5.8(c) of this Schedule 6, the Office of the Interconnection posts the violations, system conditions, economic constraints, and/or Public Policy Requirements to be addressed by the enhancement or expansion.</p> <p>OA, Schedule 6 §1.5.8(c)</p> <p>(c) Project Proposal Windows. The Office of the Interconnection shall provide notice to stakeholders of a 30-day proposal window for Short-term Projects and a 120-day proposal window for Long-lead Projects and Economic-based Enhancements or Expansions . . .</p>	<p>Market Efficiency Projects will be evaluated only in the 24-month cycle like Long-lead Projects. Because Market Efficiency Projects do not have a required in-service date, but rather a justified in-service date, if no project solves the congestion issue, the congestion issue will be considered, if still appropriate (<i>i.e.</i>, there is still congestion projected), in the next planning cycle.</p> <p>For consistency non-substantive changes also will be made to OA, Schedule 6, § 1.5.7 to reflect the use of the new defined term “Economic-based Enhancement or Expansion.”</p>

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<p><i>(18, 19) Time-Based Transmission Project Proposal Process – Proposal Windows:</i> Commission directed PJM to revise the OA to: (1) list the criteria that PJM will use to make the determination to shorten or extend the proposal window for Short-term and Long-lead Projects; and (2) provide an explanation of how PJM proposes to evaluate the criteria in order to enable stakeholders to understand how PJM determines to shorten or extend the default proposal window for Short-term and Long-lead Projects. (March 22 Order at P 239).</p>	<p>OA, Schedule 6 § 1.5.8(c) (c) Project Proposal Windows. The Office of the Interconnection shall provide notice to stakeholders of a 30-day proposal window for Short-term Projects and a 120-day proposal window for Long-lead Projects and Economic-based Enhancements or Expansions. The Office of Interconnection may (i) shorten the proposal windows should the identified need require a shorter proposal window to meet the needed in-service date of the proposed enhancements or expansions; or (ii) extend the windows as needed to accommodate updated information regarding system conditions. The Office of the Interconnection may shorten or lengthen a proposal window that is not yet opened based on the following criteria: (i) complexity of the violation or system condition; and (ii) whether there is sufficient time remaining in the relevant planning cycle to accommodate a standard proposal window and timely address the violation or system condition. The Office of the Interconnection may lengthen a proposal window that already is opened based on or more of the following criteria: (i) changes in assumptions or conditions relating to the underlying need for the project, such as load growth or Reliability Pricing Model auction results; (ii) availability of new or changed information regarding the nature of the violations and the facilities involved; and (iii) time remaining in the relevant proposal window. In the event that the Office of the Interconnection determines to lengthen or shorten a proposal window, it will post on the PJM website the new proposal window period and an explanation as to the reasons for the change in the proposal window period. During these windows, the Office of the Interconnection will accept proposals from existing Transmission Owners and Nonincumbent Developers for potential enhancements or expansions to address the posted violations, system conditions, economic constraints, as well as Public Policy Requirements.</p>	

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<p><i>(20) Time-Based Transmission Project Proposal Process – Re-evaluation and Reposting:</i></p> <p>In the March 22 Order the Commission noted that: “In determining whether there is insufficient time for reevaluation and reposting, PJM proposes to consider such factors as the time necessary: (1) to obtain regulatory approvals; (2) to acquire long-lead equipment; (3) to meet construction schedules; (4) to complete the required in-service date; and (5) for other time-based factors impacting the feasibility of achieving the required in-service date.</p> <p>With regard to this criteria the Commission further required PJM to “explain how PJM proposes to consider the enumerated criteria listed above to determine whether there is insufficient time for re-posting and reevaluation, and how such a determination requires that an incumbent transmission owner be assigned to build a Long-lead Project proposed by the Office of Interconnection.” (March 22 Order at PP 241-242, 246).</p>	<p>OA Schedule 6 § 1.5.8(g)</p> <p>(g) Procedures if No Long-lead Project <u>or Economic-based Enhancement or Expansion</u> Proposal is Determined to be the More Efficient or Cost-Effective Solution. If the Office of the Interconnection determines that none of the proposed Long-lead Projects received during the Long-lead Project proposal window would be the more efficient or cost-effective solution to resolve a posted violation, <u>or</u> system condition, or economic constraint, the Office of the Interconnection may re-evaluate and re-post on the PJM website the unresolved violations, <u>or</u> system conditions, or economic constraints pursuant to Section 1.5.8(b), provided such re-evaluation and re-posting would not affect the ability of the Office of the Interconnection to timely address the identified reliability need. In the event that re-posting and conducting such re-evaluation would prevent the Office of the Interconnection from timely addressing the existing and projected limitations on the Transmission System that give rise to the need for an enhancement or expansion, the Office of the Interconnection shall propose a project to solve the posted violation, <u>or</u> system condition or economic constraint for inclusion in the recommended plan and shall present such project to the Transmission Expansion Advisory Committee for review and comment. The Transmission Owner(s) in the Zone(s) where the project is to be located shall be the Designated Entity(ies) for such project. In determining whether there is insufficient time for re-posting and re-evaluation, the Office of the Interconnection shall <u>develop and post on the PJM website a transmission solution construction time line for input and review by the Transmission Expansion Advisory Committee that will include consider</u> factors such as, but not limited to, the time necessary: (i) <u>deadlines for obtaining</u> to obtain regulatory approvals, (ii) <u>dates by which to acquire</u> long lead equipment <u>should be acquired</u>, (iii) to meet construction schedules, (iv) <u>the time necessary to complete a proposed solution to meet</u> the required in-service date, and (v) for other time-based factors impacting the feasibility of achieving the required in-service date. <u>Based on input from the Transmission Expansion Advisory Committee and the time</u></p>	<p>PJM will develop and post for the TEAC a construction time line for the solution, which will include items (1) – (5). Based on the timeline and the time available, PJM will make the determination as to whether there is insufficient time for re-posting and reevaluation. If there is insufficient time, PJM will designate the transmission owner to build a Long-lead Project proposed by the Office of Interconnection</p>

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	<p><u>frames set forth in the construction timeline, the Office of the Interconnection shall determine whether there is sufficient time to re-post and conduct a re-evaluation and timely address the existing and projected limitations on the Transmission System that give rise to the need for an enhancement or expansion. To the extent that an economic constraint remains unaddressed, the economic constraint will be re-posted and re-evaluated.</u></p>	
<p>(21) Time-Based Transmission Project Proposal Process – Immediate-need Reliability Projects: The Commission directed PJM to explain: (1) why part (ii) of its definition for Immediate-need Reliability Projects is necessary; and (2) how it will implement these factors in making its decision. (March 22 Order at PP 252, 253, 255).</p>	<p>OA Definitions --1.15A Immediate-need Reliability Project.</p> <p>A reliability-based transmission enhancement or expansion: (i) with an in-service date of three years or less from the year the Office of the Interconnection identified the existing or projected limitations on the Transmission System that gave rise to the need for such enhancement or expansion pursuant to the study process described in section 1.5.3 of this Schedule 6.; or (ii) for which the Office of the Interconnection determines that an expedited designation is required to address existing and projected limitations on the Transmission System due to immediacy of the reliability need in light of the projected time to complete the enhancement or expansion. In determining whether an expedited designation is required, the Office of the Interconnection shall consider time-based factors such as, but not limited to, the time necessary: (i) to obtain regulatory approvals; (ii) to acquire long lead equipment; (iii) to meet construction schedules; (iv) to complete engineering plans; and (v) for other time-based factors impacting the feasibility of achieving the required in-service date.</p>	<p>Deleting part (ii) of the definition.</p>

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<p>(22) Time-Based Transmission Project Proposal Process – Immediate-need Reliability Projects: The Commission held that Immediate-need Reliability Projects must be used in limited circumstances based on the following five criteria: “First, the Immediate-need Reliability Project must be needed in three years or less to solve reliability criteria violations. Second, PJM must separately identify and then post an explanation, whether or not it intends to provide for a proposal window, of the reliability violations and system conditions in advance for which there is a time-sensitive need. The explanation must be in sufficient detail to allow stakeholders to understand the need and why it is time-sensitive. Third, the process that PJM uses to decide whether an Immediate-need Reliability Project is assigned to an incumbent transmission owner must be clearly outlined in PJM’s OATT and must be open, transparent, and not unduly discriminatory. PJM must provide to stakeholders and post on its website a full and supported written description explaining: (1) the decision to designate an incumbent transmission owner as the entity responsible for construction and ownership of the project, including an explanation of other transmission or non-transmission options that the region considered but concluded would not sufficiently address the immediate reliability need; and (2) the circumstances that generated the immediate reliability need and an explanation of why that immediate reliability need was not identified earlier. Fourth, stakeholders must be permitted time to provide comments in response to the description in criterion three and such comments must be made publicly available. Finally, PJM must</p>	<p>Still in development.</p>	<p>Will incorporate the five criteria into the OA.</p>

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<p>maintain and post a list of prior year designations of all projects in the limited category of transmission projects for which the incumbent transmission owner was designated as the entity responsible for construction and ownership of the project. The list must include the project’s need-by date and the date the incumbent transmission owner actually energized the project. Such list must be filed with the Commission as an informational filing in January of each calendar year covering the designations of the prior calendar year.” (March 22 Order at P 248).</p> <p>With regard to criteria 2 through 5, Commission directs PJM to “file a further compliance filing demonstrating how the definition and procedures related to Immediate-need Reliability Projects comply with criteria two through five discussed above. In addition, if PJM cannot demonstrate that its current definition and procedures related to Immediate-need Reliability Projects comply with these criteria, we direct PJM to file OATT revisions to comply with these criteria.” (March 22 Order at PP 253, 255).</p>		

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<p>(23) Qualification Criteria Clarifications: Commission directed PJM to clarify that criteria in proposed in section 1.5.8(a) and 1.5.8(c) apply to both incumbent and non-incumbent developers. (March 22 Order at P 276).</p>	<p>OA Definitions 1.26A.01 Nonincumbent Developer. “Nonincumbent Developer” shall mean: (1) a transmission developer that does not have a retail distribution service territory or footprint; or (2) a public utility transmission provider that proposes a transmission project outside of its existing retail distribution service territory or footprint, where it is not the incumbent for purposes of that project.</p> <p>OA Schedule 6 § 1.5.8(a). (a) Pre-Qualification Requirements. On an annual basis, all entities, including existing Transmission Owners and Nonincumbent Developers, that desire to be the a Designated Entity for Immediate-need Reliability Projects, Short-term Projects, or Long-lead Projects shall submit to the Office of the Interconnection during the pre-qualification window, noticed by the Office of the Interconnection, the following information: . . .</p> <p>OA Schedule 6 § 1.5.8(c). (c) Project Proposal Windows. . . . During these windows, the Office of the Interconnection will accept proposals from existing Transmission Owners and Nonincumbent Developers for potential enhancements or expansions to address the posted violations, system conditions, economic constraints, as well as Public Policy Requirements. (c)(1) All proposals submitted in the proposal windows must contain: . . . (c)(2) Proposals from all entities (both existing Transmission Owners and Nonincumbent Developers) that indicate the entity if the proposing entity states that it intends to be a Designated Entity, the proposal also must contain information to the extent not previously provided pursuant to Section 1.5.8(a) demonstrating: . . . (c)(3) The Office of the Interconnection may request additional reports or information from an existing Transmission Owner or Nonincumbent Developers that it determines are reasonably necessary to evaluate the-its specific project proposal pursuant to the criteria set forth in Sections 1.5.8(e) and 1.5.8(f) of this</p>	<p>Will revise sections 1.5.8(a) & (c) to clarify that the qualification criteria apply to <i>both Transmission Owners and nonincumbent developers</i>. Consistent with this change PJM plans to revise the definition of “Designated Entity” to add more clarity (see item 17).</p>

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
	<p data-bbox="680 183 863 212">Schedule 6. . .</p> <p data-bbox="680 248 1444 651">(c)(4) The request for additional reports or information by the Office of the Interconnection pursuant to Section 1.5.8(c)(3) of this Schedule 6 may be used only to clarify a proposed project as submitted. In response to the Office of the Information’s request for additional reports or information, the proposing entity <u>(whether an existing Transmission Owner or Nonincumbent Developer)</u> may not submit a new project proposal or modifications to a proposed project once the proposal window is closed. In the event that the proposing entity fails to timely cure the deficiency or provide the requested reports or information regarding a proposed project, the proposed project will not be considered for inclusion in the recommended plan.</p> <p data-bbox="680 686 1318 716"><i>Complete sections not quoted here because of length.</i></p>	

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
<p>(24) Qualification Criteria Clarifications: Commission directed PJM to include the phrase “entity or its affiliate, partner, or parent company” throughout all of section 1.5.8(a) or to demonstrate why such language should not be included in this particular provision. (March 22 Order at P 277).</p>	<p>OA, Schedule 6 § 1.5.8 (a) Pre-Qualification Requirements. . . . (i) name and address of the entity; (ii) the technical and engineering qualifications of the entity or its affiliate, partner, or parent company; (iii) the demonstrated experience of the entity or its affiliate, partner, or parent company to develop, construct, maintain, and operate transmission facilities, including a list or other evidence of transmission facilities the entity, its affiliate, partner, or parent company previously developed, constructed, maintained, or operated; (iv) the previous record of the entity or its affiliate, partner, or parent company regarding construction, maintenance, or operation of transmission facilities both inside and outside of the PJM Region; (v) the capability of the entity or its affiliate, partner, or parent company to adhere to standardized construction, maintenance and operating practices; (vi) the financial statements of the entity or its affiliate, partner, or parent company for the most recent fiscal quarter, as well as the most recent three fiscal years, or the period of existence of the entity, if shorter, or such other evidence demonstrating an entity’s <u>or its affiliate’s, partner’s, or parent company’s</u> current and expected financial capability acceptable to the Office of the Interconnection; (vii) a commitment by the entity to execute the Consolidated Transmission Owners Agreement, if the entity becomes a Designated Entity; (viii) evidence demonstrating the ability of the entity <u>or its affiliate, partner, or parent company</u> to address and timely remedy failure of facilities; (ix) a description of the experience of the entity <u>or its affiliate, partner, or parent company</u> in acquiring rights of way; and (x) such other supporting information that the Office of Interconnection requires to make the pre-qualification determinations consistent with this Section. . . .</p>	<p>The phrase “or its affiliate, partner, or parent company” was not added to 1.5.8(a)(i) because the PJM needs the name and address of the entity that is proposing the project, not its affiliate, partner, or parent company, or to 1.5.8(a)(vii) because this subsection requires a commitment by the entity that actually is proposing a project (not its affiliate, partner, or parent company) to execute the Consolidated Transmission Owners Agreement, if the entity becomes a Designated Entity.”</p>

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
<p>(25) Qualification Criteria Clarifications: PJM must “clarify the interaction between, and timeline of: (1) the pre-qualification window; (2) the reevaluation of an entity’s pre-qualification; and (3) the proposed Short-term and Long-lead Project proposal windows. Such clarification must include, but is not limited to, which proposal window PJM is referring to when it states in its proposed revisions that its determinations regarding whether an entity is qualified to be Designated Entity in both the first instance and in PJM’s reevaluation of its decision that an entity is not qualified to be a Designated Entity, must be made, “prior to the <i>next</i> proposal window.” (March 22 Order at P 279)</p>	<p>1.5.8 Development of Long-lead Projects, Short-term Projects, and Immediate-need Reliability Projects, and Economic-based Enhancements or Expansions.</p> <p>(a) Pre-Qualification RequirementsProcess.</p> <p>(a)(1) On an annual basisOn September 1 of each year, the Office of the Interconnection shall open a thirty-day pre-qualification window for entities, including existing Transmission Owners and Nonincumbent Developers, that desire to be the Designated Entity for Immediate-need Reliability Projects, Short-term Projects, or Long-lead Projects shall submit to submit to the Office of the Interconnection: (i) applications to pre-qualify as eligible to be a Designated Entity; -or (ii) updated information as described in Section 1.5.8(a)(3) of this Schedule 6. Pre-qualification applications shall contain the following information: to the Office of the Intereconnection during the pre-qualification window, noticed by the Office of the Intereconnection, the following information: (i) name and address of the entity; (ii) the technical and engineering qualifications of the entity or its affiliate, partner, or parent company; (iii) the demonstrated experience of the entity or its affiliate, partner, or parent company to develop, construct, maintain, and operate transmission facilities, including a list or other evidence of transmission facilities the entity, its affiliate, partner, or parent company previously developed, constructed, maintained, or operated; (iv) the previous record of the entity or its affiliate, partner, or parent company regarding construction, maintenance, or operation of transmission facilities both inside and outside of the PJM Region; (v) the capability of the entity or its affiliate, partner, or parent company to adhere to standardized construction, maintenance and operating practices; (vi) the financial statements of the entity or its affiliate, partner, or parent company for the most recent fiscal quarter, as well as the most recent three fiscal years, or the period of existence of the entity, if shorter, or such other evidence demonstrating an entity’s <u>or its affiliate’s, partner’s, or parent company’s</u> current and expected financial capability acceptable to the Office of the Interconnection; (vii) a commitment by the entity to execute the Consolidated Transmission Owners</p>	

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
	<p>Agreement, if the entity becomes a Designated Entity; (viii) evidence demonstrating the ability of the entity <u>or its affiliate, partner, or parent company</u> to address and timely remedy failure of facilities; (ix) a description of the experience of the entity <u>or its affiliate, partner, or parent company</u> in acquiring rights of way; and (x) such other supporting information that the Office of Interconnection requires to make the pre-qualification determinations consistent with this Section <u>1.5.8(a)</u>.</p> <p>(a)(2) Based on this information, and prior to the opening of the next project proposal window, No later than October 31, the Office of the Interconnection shall determine whether an entity is qualified to be a Designated Entity and shall notify the entity entities that submitted pre-qualification applications or updated information during the annual thirty-day pre-qualification window, whether they are, or will continue to be, pre-qualified as eligible to be a Designated Entity of such determination. In the event the Office of the Interconnection determines that an entity (i) is not, or no longer will continue to be, pre-qualified as to be eligible to be a Designated Entity, or (ii) provided insufficient information to determine prequalification, the Office of the Interconnection shall inform that the entity it is not pre-qualified and include in the notification the basis for its determination. The entity then may shall have 30 days or other such period as may be agreed to by the Office of the Interconnection to submit additional information, which the Office of the Interconnection shall consider in re-evaluating whether the entity is, or will continue to be, pre-qualified as to be eligible to be a Designated Entity. If the entity submits additional information by November 30, the Office of the Interconnection shall notify the entity of the results of its re-evaluation no later than December 15, within 15 business days of receiving the additional information or such other reasonable time period as needed by the Office of the Interconnection to make the determinations required by this Section prior to the opening of the next project proposal window. If the entity submits additional information after November 30, the Office of the Interconnection shall use reasonable efforts to re-evaluate the application, with the additional information, and notify the entity of its determination as soon as practicable. No</p>	

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
	<p>later than December 31, the Office of the Interconnection shall post on the PJM website the list of entities that are pre-qualified as eligible to be Designated Entities. If an entity is notified by the Office of the Interconnection that it the entity does not pre-qualify or will not continue to be pre-qualified as to be eligible to be a Designated Entity, such entity may request dispute resolution pursuant to Schedule 5 of the Operating Agreement.</p> <p>(a)(3) If an entity was pre-qualified as to be eligible to be a Designated Entity in the previous year, such entity is not required to re-submit information to pre-qualify to be a Designated Entity in the with respect to the current upcoming year. In provided, however, that, the event the information on which the entity's pre-qualification is based changes with respect to the upcoming year, such entity must submit to the Office of the Interconnection all updated information during the annual thirty-day pre-qualification window and the timeframes for notification in Section 1.5.8(a)(2) of this Schedule 6 shall apply. In the event the information on which the entity's pre-qualification is based changes with respect to the current year, such entity must submit to the Office of the Interconnection all updated information at the time the information has changed changes- and the Office of the Interconnection shall use reasonable efforts to evaluate the updated information and notify the entity of its determination as soon as practicable. In the event an entity submits updated information, the Office of the Interconnection shall determine whether the entity continues to qualify to be a Designated Entity and shall notify the entity of its determination within a reasonable period of time prior to the opening of the next proposal window.</p> <p>(a)(4) As determined by the Office of the Interconnection, an entity may submit a pre-qualification application pre-qualify outside the annual thirty-day pre-qualification window for good cause shown. For a pre-qualification application received outside of the annual thirty-day pre-qualification window, the Office of the Interconnection shall use reasonable efforts to process the application and notify the entity as to whether it pre-qualifies as eligible to be a Designated Entity as soon as practicable. This Section shall not apply to entities that desire to propose projects</p>	

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
	<p>for inclusion in the recommended plan but do not intend to be a Designated Entity.</p> <p><u>(a)(5) To be designated as a Designated Entity for any project proposed pursuant to Section 1.5.8 of this Schedule 6, existing Transmission Owners and Nonincumbent -Developers must be pre-qualified as eligible to be a Designated Entity pursuant to this Section 1.5.8(a). This Section 1.5.8(a) shall not apply to entities that desire to propose projects for inclusion in the recommended plan but do not intend to be a Designated Entity.</u></p>	

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
<p>(26) Qualification Criteria Clarifications: Commission found that the language in section 1.5.8(j) of Schedule 6 is vague, and directed PJM to clarify that regardless whether a Designated Entity is an incumbent transmission developer or a nonincumbent transmission developer, an entity that accepts its designation as a Designated Entity must submit to the Office of Interconnection within 60 days of becoming the Designated Entity: (1) a letter of credit; (2) an executed agreement; and (3) construction and state approval milestones. (March 22 Order at P 280).</p>	<p>OA Definitions 1.7A Designated Entity. (1) AnThe entity, <u>including an existing Transmission Owner or Nonincumbent Developer</u>, designated by the Office of the Interconnection with the responsibility to construct, own, operate, maintain, and finance Immediate-need Reliability Projects, Short-term Projects, and Long-lead Projects, <u>and Economic-based Enhancements or Expansions</u> pursuant to Section 1.5.8 of Schedule 6 of this Agreement.</p> <p>OA, Schedule 6 § 1.5.8(j) (j) Acceptance of Designation. Within 30 days of receiving notification of its designation as a Designated Entity, the Designated—Entity<u>existing Transmission Owner or Nonincumbent Developer receiving the notification</u> shall notify the Office of the Interconnection of its acceptance of such designation. Within 60 days of receiving notification of its designation, or other reasonable time period as determined by the Office of the Interconnection, the Designated Entity <u>(both existing Transmission Owners and Nonincumbent Developers)</u> shall submit to the Office of the Interconnection a development schedule which shall include, but not be limited to: (i) construction milestones necessary to develop and construct the project to achieve the required in-service date, including milestone dates for obtaining all necessary state approvals; (ii) a letter of credit as determined by the Office of Interconnection to cover the incremental costs of construction resulting from reassignment of the project; and (iii) an executed agreement with the Office of the Interconnection setting forth the rights and obligations related to being the Designated Entity for the project.</p>	<p>Will revise sections 1.5.8(j) to clarify that all entities (<i>both Transmission Owners and nonincumbent developers</i>) that accept a designation as a Designated Entity must submit to the Office of Interconnection within 60 days of becoming the Designated Entity: (1) a letter of credit; (2) an executed agreement; and (3) construction and state approval milestones. Consistent with this change PJM plans to revise the definition of “Designated Entity” to add more clarity.</p>
<p>(27) Designated Entity Agreement: Commission directed PJM to submit any such <i>pro forma</i> Designated Entity Agreement for review by the Commission. (March 22 Order at P 280).</p>	<p>None.</p>	<p>PJM anticipates filing the <i>pro forma</i> Designated Entity Agreement with the Commission for review and acceptance prior to January 1, 2014.</p>

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
<p>(28) Information Requirements --State Approvals: Commission directed PJM “to revise Schedule 6, section 1.5.6, to clarify that PJM’s intended use of dates by which all necessary state approvals must be obtained is part of its ongoing monitoring of progress of the estimated construction schedules, consistent with Order No. 1000-A.” (March 22 Order at P 298).</p>	<p>Still in development.</p>	
<p>(29) Evaluation Process – Confidential Information: Commission directed PJM to: “propose a process and/or procedures whereby PJM will: (1) determine whether any generally applicable information regarding the transmission project proposal process is discussed in a confidential meeting; and (2) publicly provide that generally applicable information.” (March 22 Order at 311).</p>	<p>Still under development. None</p>	
<p>(30) Evaluation Process – Economic Projects: Commission directed PJM to provide additional detail in its OATT [OA] about the other factors that will be used in the evaluation process for economic projects. (March 22 Order at P 312).</p>	<p>OA, Schedule 6 § 1.5.7(d). “An economic-based enhancement or expansion shall be included in the Regional Transmission Expansion Plan recommended to the PJM Board, if the relative benefits and costs of the economic-based enhancement or expansion meet a Benefit/Cost Ratio threshold of at least 1.25:1.”</p>	<p>Reverting to original language. Explain that the revision submitted with the October 25 Compliance Filing was in anticipation of a multi-driver approach, which is not fully developed. At the appropriate time and, if necessary, PJM will revisit this revision and amend the OA accordingly, based on a multi-driver approach.</p>

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
<p>(31) Evaluation Process – Cost Effectiveness: Commission requires PJM to further explain the circumstances, if any, under which a proposed transmission solution’s cost-effectiveness would not be applicable in PJM’s evaluation.” (March 22 Order at P 313).</p>	None	<p>The Commission’s statement that “PJM shall consider the cost-effectiveness of a proposed transmission project <i>to the extent this factor is applicable</i> in determining whether a proposed transmission project is a more efficient or cost-effective transmission solution to regional transmission needs” is a misstatement. (March 22 Order at P 313). Cost effectiveness is a factor in determining the more efficient and cost-effective solution. Consistent with Commission precedent, PJM will “evaluate and select among competing transmission solutions and resources,” using criteria that include “the relative economics and effectiveness of performance for each alternative offered for consideration.” (March 22 Order at P 313).</p>
<p>(32) Re-evaluation Process – Choosing Alternatives: With regard to those instances where a project must be re-evaluated for failure to meet a milestone, etc., the Commission is concerned “that the lack of description regarding how PJM will decide whether to retain the transmission project, remove the transmission project, or select an alternative transmission solution following such reevaluation may allow PJM too much discretion in making this determination.” Therefore, PJM is directed to provide an “explanation of the basis upon which PJM will retain or remove a selected transmission project, or select an alternative transmission solution.” (March 22 Order at P 318).</p>	None.	<p>PJM will re-evaluate current needs; including any system changes since the project was designated such as changes in load, deactivations etc. For example, if load growth is less, a lesser solution may be more efficient and cost effective. The development stage of the project (beginning, middle, or end) also may factor in the decision.</p>

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
<p>(33) Cost Allocation: Commission found that “other parts of the OATT and other PJM Agreements contain definitions and provisions that appear to preclude nonincumbent transmission developers from filing for transmission cost-based rates prior to becoming a party to the CTOA.” Commission required PJM and/or PJM Transmission Owners to explain how the various provisions work together to achieve the intended result of Schedule 12, i.e. to allow an entity designated in RTEP to construct a transmission project to begin recovering the costs of that transmission project. (March 22 Order at P 327).</p>		<p>Must be addressed with Transmission Owners.</p>
<p>(34, 35) Cost Allocation – Principle 4: Commission required PJM and its Transmission Owners to submit a further compliance filing that revises the PJM OATT to provide for identification of the consequences of a transmission facility selected in the regional transmission plan for purposes of cost allocation. PJM and the PJM Transmission Owners also must address in the further compliance filing whether the PJM region has agreed to bear the costs associated with any required upgrades in another transmission planning region and, if so, how such costs will be allocated under the PJM regional cost allocation methods. (March 22 Order at P 422, <i>see also</i> P 426).</p>		<p>PJM currently has agreements with its neighboring region that provide for identification of potential consequences on a neighboring system as a result of a transmission facility included in the RTEP.</p> <p>None of the existing agreements provide for PJM or its neighboring regions to bear the costs associated with any upgrades required to be built due to another region’s projects built solely within the other region to meet the other region’s needs.</p>

March 22 Order Compliance Requirement	Suggested Compliance OA/Tariff Changes	Further Explanation
<p>(36) Cost Allocation – Solution-Based DFAX: The Commission noted that the “version of Schedule 12 superseded by the PJM Transmission Owners October 11 Filing contained a section (b)(iii)(4), which detailed how a zone’s or merchant transmission facilities’ usage was used to derive cost assignments under the Violation-Based DFAX method. We find that the proposed Schedule 12 must contain a similar provision pertaining to the Solution-Based DFAX method in order to be just and reasonable.” Therefore, the Commission directed “PJM and the PJM Transmission Owners to submit a compliance filing containing revised tariff provisions explaining how the Solution-Based DFAX method is used to calculate assignments of cost responsibility.” (March 22 Order at P 428).</p>		<p>Must be addressed with Transmission Owners.</p>
<p>(37) Cost Allocation – Voltage and Other Requirements: Commission found that the Transmission Owners’ filing “may discriminate against DC transmission facilities for the purposes of qualifying as Regional Facilities;” therefore, it required PJM and the PJM Transmission Owners to establish “criteria for qualification as a Regional Facility that consider a DC transmission facility and an AC transmission facility in a comparable manner.” (March 22 Order at P 440).</p>		<p>Must be addressed with Transmission Owners.</p>