



Proposed Changes to Risk Documentation Requirements

Market Implementation Committee

September 3, 2014

Harold Loomis

- Current requirements for Officer Certifications include
 - Submittal of notarized paper form
 - Submittal by all applicants even if not active
- PJM Proposes to:
 - Allow submission in a form acceptable to PJM
 - Would enable use of an electronic signature service
 - Remove notary requirement
 - Remove requirement for submittal from inactive applicants
- The Credit Subcommittee unanimously endorsed the proposal at its July 2014 meeting

- Current requirement is for annual submission of risk policy documentation by applicable members even if identical to prior submission
- PJM proposes to allow certification that no changes of substance were made to portions related to activities in PJM in lieu of resubmission
 - Administrative changes or changes outside of PJM activity would be allowed
 - This is not a “materiality” test
 - Any change of substance, regardless of materiality, would eliminate eligibility to make the certification and would require resubmission of the appropriate documentation
- The Credit Subcommittee unanimously endorsed the proposal at its July 2014 meeting
- PJM is requesting MIC endorsement of the combined Officer Certification and Risk Documentation proposal