Proposed Changes to Risk Documentation Requirements

Credit Subcommittee
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• Current requirement for Officer Certifications include
  – Submittal of notarized paper form
  – Submittal by all applicants even if not active
• PJM Proposes to:
  – Allow electronic submission in a form acceptable to PJM
    • Likely using a commercial document signing application
  – Remove notary requirement
  – Remove requirement for submittal from inactive applicants
• PJM is asking for endorsement to move this proposal forward in the stakeholder process
Current requirements for submission of risk policy documentation include annual submission by certain members of a complete set of risk policy and procedure documentation, even if no changes were made since prior submission.

PJM proposes to allow certification that no changes of substance were made to portions related to activities in PJM:
- 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.

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