

## January 19, 2017

- FERC declares FTR Forfeiture Rule unjust and unreasonable, orders changes.
- Changes effective “the date of this order.”

## May 20, 2021

- FERC rejects PJM’s entire April 18, 2017 compliance filing exclusively on the basis of the “penny test.”
- States that PJM implemented the changes in its April 18, 2017 compliance filing without FERC approval, and therefore the prior version of the FTR Forfeiture Rule has been/is still legally in effect.
- Directs compliance filing due July 19, 2021.

## April 18, 2017

- PJM submits compliance filing with changes.
- States that PJM will proceed with implementation 1/19/17.

PJM implements revised FTR forfeiture rule.

## July 19, 2021

- Due date for PJM compliance filing.

Potential refunds applying prior version of FTR forfeiture rule.

JAN. FEB. MAR. APR. MAY JUN. JUL. AUG. SEPT. OCT.

2017 2018 2019 2020 2021