



# Proposed Changes to Risk Documentation Requirements

Market Implementation Committee

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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
- The Credit Subcommittee unanimously endorsed the proposal at its July 2014 meeting
- The MIC will be asked to endorse the proposal at its next meeting

- 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
- The Credit Subcommittee unanimously endorsed the proposal at its July 2014 meeting
- The MIC will be asked to endorse the proposal at its next meeting