|    | Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Source  | Current Language  | Proposed Revisions   | Rationale/Notes  |
|----|---|---------|---|--|--|
| 1. | Tariff, Definitions –<br>A-B  | Chen Lu | Annual Resource Price Adder:<br>"Annual Resource Price Adder" shall mean, for Delivery Years<br>starting June 1, 2014 and ending May 31, 2017, an addition to the<br>marginal value of Unforced Capacity and the Extended Summer<br>Resource Price Adder as necessary to reflect the price of Annual<br>Resources required to meet the applicable Minimum Annual<br>Resource Requirement.   |  | Term has passed sunset date and is no longer<br>relevant under the Capacity Performance<br>construct |
| 2. | Tariff, Definitions –<br>A-B  | Chen Lu | the 2018/2019 and 2019/2020 Delivery Years, a difference between<br>the clearing price for Base Capacity Demand Resources and Base<br>Capacity Energy Efficiency Resources and the clearing price for<br>Base Capacity Resources and Capacity Performance Resources,  | the 2018/2019 and 2019/2020 Delivery Years, a difference between the<br>elearing price for Base Capacity Demand Resources and Base Capacity<br>Energy Efficiency Resources and the clearing price for Base Capacity<br>Resources and Capacity Performance Resources, representing the cost-<br>to procure additional Base Capacity Resources or Capacity-                          | Term has passed sunset date and is no longer<br>relevant under the Capacity Performance<br>construct |
| 3. | Tariff, Definitions –<br>A-B  | Chen Lu | <b>Base Capacity Resource Price Decrement:</b><br>"Base Capacity Resource Price Decrement" shall mean, for the<br>2018/2019 and 2019/2020 Delivery Years, a difference between the<br>clearing price for Base Capacity Resources and the clearing price for<br>Capacity Performance Resources, representing the cost to procure<br>additional Capacity Performance Resources out of merit order when<br>the Base Capacity Resource Constraint is binding. | Base Capacity Resource Price Decrement:<br>"Base Capacity Resource Price Decrement" shall mean, for the  | Term has passed sunset date and is no longer<br>relevant under the Capacity Performance<br>construct |
| 4. | Tariff, Definitions – (<br>E-F  | Chen Lu | "Extended Summer Resource Price Adder" shall mean, for Delivery<br>Years through May 31, 2018, an addition to the marginal value of<br>Unforced Capacity as necessary to reflect the price of Annual<br>Resources and Extended Summer Demand Resources required to  | Extended Summer Resource Price Adder:-<br>"Extended Summer Resource Price Adder" shall mean, for Delivery-<br>Years through May 31, 2018, an addition to the marginal value of<br>Unforced Capacity as necessary to reflect the price of Annual<br>Resources and Extended Summer Demand Resources required to meet<br>the applicable Minimum Extended Summer Resource Requirement. | Term has passed sunset date and is no longer<br>relevant under the Capacity Performance<br>construct |

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| 5. | Section, Title<br>Tariff, Definitions –<br>L-M-N                             | Chen Lu  | Limited Resource Price Decrement:<br>"Limited Resource Price Decrement" shall mean, for the 2017/2018<br>Delivery Year, a difference between the clearing price for Limited<br>Demand Resources and the clearing price for Extended Summer<br>Demand Resources and Annual Resources, representing the cost to<br>procure additional Extended Summer Demand Resources or Annual<br>Resources out of merit order when the Limited Resource Constraint<br>is binding. | Limited Resource Price Decrement:<br>"Limited Resource Price Decrement" shall mean, for the 2017/2018-<br>Delivery Year, a difference between the clearing price for Limited-<br>Demand Resources and the clearing price for Extended Summer-<br>Demand Resources and Annual Resources, representing the cost to-<br>procure additional Extended Summer Demand Resources or Annual<br>Resources out of merit order when the Limited Resource Constraint is-<br>binding.   | Term has passed sunset date and is no longer<br>relevant under the Capacity Performance<br>construct  |
| 6. | Tariff, Definitions –<br>R-S   | Chen Lu  | Sub-Annual Resource Price Decrement:<br>"Sub-Annual Resource Price Decrement" shall mean, for the<br>2017/2018 Delivery Year, a difference between the clearing price for<br>Extended Summer Demand Resources and the clearing price for<br>Annual Resources, representing the cost to procure additional Annual   | Sub-Annual Resource Price Decrement:<br>"Sub-Annual Resource Price Decrement" shall mean, for the 2017/2018<br>Delivery Year, a difference between the clearing price for Extended<br>Summer Demand Resources and the clearing price for Annual<br>Resources, representing the cost to procure additional Annual Resources<br>out of merit order when the Sub-Annual Resource Constraint is binding   | construct   |
| 7. | Tariff, Definitions –<br>C-D<br>Operating<br>Agreement,<br>Definitions – C-D | Erin Lai | Hybrid Resource that includes both negative and positive megawatt<br>quantities (i.e., the Energy Storage Resource Model Participant or<br>solar-storage Open-Loop Hybrid Resource is capable of continually<br>and immediately transitioning from withdrawing megawatt quantities<br>from the grid to injecting megawatt quantities onto the grid or<br>injecting megawatts to withdrawing megawatts). Energy Storage   | Continuous Mode:<br>"Continuous Mode" shall mean the mode of operation of an Energy<br>Storage Resource Model Participant or solar-storage Open-Loop<br>Hybrid Resource that includes both negative and positive megawatt<br>quantities (i.e., the Energy Storage Resource Model Participant or<br>solar-storage Open-Loop Hybrid Resource is capable of continually<br>and immediately transitioning from withdrawing megawatt quantities<br>from the grid to injecting megawatt quantities onto the grid or injecting<br>megawatts to withdrawing megawatts). Energy Storage Resource<br>Model Participants or solar-storage Open-Loop Hybrid Resource<br>operating in Continuous Mode are considered to have an unlimited<br>ramp rate. Continuous Mode requires Discharge Economic Maximum<br>Megawatts to be zero or correspond to an injection, and Charge<br>Economic Maximum Megawatts to be zero or correspond to a<br>withdrawal. | Changes made to delete the references to<br>solar storage. As part of its July 26, 2023<br>filing in Docket No. ER23-2484, PJM<br>expanded the provisions in its Tariff and its<br>Operating Agreement to apply to a broader<br>set of mixed technology resources, but<br>mistakenly did not delete the references to<br>solar storage resources from the definition.<br>This change is consistent with the intent of<br>the Docket No. ER23-2484 filing, which was<br>accepted by FERC in <i>PJM Interconnection</i> ,<br><i>L.L.C.</i> , Letter Order, Docket No. ER23-2484-<br>000 (Sept. 22, 2023). |

|     | Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title        | Source   | Current Language   | Proposed Revisions   | Rationale/Notes   |
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| 8.  | C-D<br>Operating<br>Agreement,<br>Definitions – C-D                          | Erin Lai | "Discharge Economic Maximum Megawatts" shall mean the<br>maximum megawatt power output available for discharge in<br>economic dispatch by an Energy Storage Resource Model Participant<br>or solar-storage Open-Loop Hybrid Resource in Continuous Mode or<br>in Discharge Mode. Discharge Economic Maximum Megawatts shall<br>be the Economic Maximum for an Energy Storage Resource or solar-<br>storage Open-Loop Hybrid Resource in Discharge Mode or in<br>Continuous Mode. | Open-Loop Hybrid Resource in Continuous Mode or in Discharge<br>Mode. Discharge Economic Maximum Megawatts shall be the<br>Economic Maximum for an Energy Storage Resource or solar-storage<br>Open-Loop Hybrid Resource in Discharge Mode or in Continuous<br>Mode.   | expanded the provisions in its Tariff and its<br>Operating Agreement to apply to a broader<br>set of mixed technology resources, but<br>mistakenly did not delete the references to<br>solar storage resources from the definition.<br>This change is consistent with the intent of<br>the Docket No. ER23-2484 filing, which was<br>accepted by FERC in <i>PJM Interconnection</i> ,<br><i>L.L.C.</i> , Letter Order, Docket No. ER23-2484-<br>000 (Sept. 22, 2023). |
| 9.  | Tariff, Definitions –<br>C-D<br>Operating<br>Agreement,<br>Definitions – C-D | Erin Lai | "Discharge Economic Minimum Megawatts" shall mean the<br>minimum megawatt power output available for discharge in<br>economic dispatch by an Energy Storage Resource Model Participant<br>or solar-storage Open-Loop Hybrid Resource in Discharge Mode.<br>Discharge Economic Minimum Megawatts shall be the Economic<br>Minimum for an Energy Storage Resource or solar-storage Open-   | Discharge Economic Minimum Megawatts:<br>"Discharge Economic Minimum Megawatts" shall mean the minimum<br>megawatt power output available for discharge in economic dispatch<br>by an Energy Storage Resource Model Participant or solar-storage<br>Open-Loop Hybrid Resource in Discharge Mode. Discharge Economic<br>Minimum Megawatts shall be the Economic Minimum for an Energy<br>Storage Resource or solar-storage<br>Open-Loop Hybrid Resource in<br>Discharge Mode. | expanded the provisions in its Tariff and its<br>Operating Agreement to apply to a broader  |
| 10. | Tariff, Definitions –<br>C-D<br>Operating<br>Agreement,<br>Definitions – C-D | Erin Lai | "Discharge Mode" shall mean the mode of operation of an Energy<br>Storage Resource Model Participant or solar-storage Open-Loop<br>Hybrid Resource that only includes positive megawatt quantities   | Discharge Mode:<br>"Discharge Mode" shall mean the mode of operation of an Energy<br>Storage Resource Model Participant or solar-storage Open-Loop<br>Hybrid Resource that only includes positive megawatt quantities (i.e.,<br>the Energy Storage Resource Model Participant or solar-storage Open-<br>Loop Hybrid Resource is only injecting megawatts onto the grid).   | Changes made to delete the references to<br>solar storage. As part of its July 26, 2023<br>filing in Docket No. ER23-2484, PJM<br>expanded the provisions in its Tariff and its<br>Operating Agreement to apply to a broader  |

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| 11. | Tariff, Definitions –<br>C-D  | Erin Lai |   | Discharge Ramp Rate:   | This change is consistent with the intent of<br>the Docket No. ER23-2484 filing, which was<br>accepted by FERC in PJM Interconnection,<br>L.L.C., Letter Order, Docket No. ER23-<br>2484-000 (Sept. 22, 2023).<br>Changes made to delete the references to<br>solar storage. As part of its July 26, 2023<br>filing in Docket No. ER23-2484, PIM   |
|     | Operating<br>Agreement,<br>Definitions – C-D                          |          |   | Energy Storage Resource Model Participant or <del>solar storage</del> Open-<br>Loop Hybrid Resource in Discharge Mode.   | filing in Docket No. ER23-2484, PJM<br>expanded the provisions in its Tariff and its<br>Operating Agreement to apply to a broader<br>set of mixed technology resources, but<br>mistakenly did not delete the references to<br>solar storage resources from the definition.<br>This change is consistent with the intent of<br>the Docket No. ER23-2484 filing, which was<br>accepted by FERC in PJM Interconnection,<br>L.L.C., Letter Order, Docket No. ER23-<br>2484-000 (Sept. 22, 2023).   |
| 12. | Tariff, Definitions –<br>L-M-N  |          | term is used in Tariff, Attachment M, in which case Market<br>Participant shall mean an entity that generates, transmits, distributes,<br>purchases, or sells electricity, ancillary services, or any other product<br>or service provided under the PJM Tariff or Operating Agreement<br>within, into, out of, or through the PJM Region, but it shall not<br>include an Authorized Government Agency that consumes energy for<br>its own use but does not purchase or sell energy at wholesale. | "Market Participant" shall mean a Market Buyer, a Market Seller,<br>and/or an Economic Load Response Participant, except when that term<br>is used in or pertaining to Tariff, Attachment M, Tariff, Attachment Q,<br>Operating Agreement, section 15, Tariff, Attachment K-Appendix,<br>section 1.4 and Operating Agreement, Schedule 1, section 1.4.<br>"Market Participant," when such term is used in Tariff, Attachment M,<br>in which case Market Participant shall mean an entity that generates,<br>transmits, distributes, purchases, or sells electricity, ancillary services,<br>or any other product or service provided under the PJM Tariff or<br>Operating Agreement within, into, out of, or through the PJM Region,<br>but it shall not include an Authorized Government Agency that<br>consumes energy for its own use but does not purchase or sell energy at<br>wholesale. <u>"Market Participant," when such term is used in or</u><br>pertaining to Tariff, Attachment Q, Operating Agreement, section 15, | The Tariff definition of "Market Participant"<br>requires revision to align with the definition<br>of "Market Participant" in the PJM Operating<br>Agreement. The Market Participant<br>definitions in the Tariff and Operating<br>Agreement were filed as part of PJM's credit<br>risk enhancement filing on March 31, 2020,<br>in Docket No. ER20-1451-000 ("March 2020<br>Filing), and accepted by FERC in the Order<br>Accepting Filing issued on May 29, 2020,<br>171 FERC ¶ 61,173. The March 2020 Filing<br>revised the definition of Market Participant in<br>both the Tariff and Operating Agreement;<br>however, due to an administrative oversight,<br>the Tariff Market Participation definition was |

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|     |   |              |  | Economic Load Response Participant, an FTR Participant, a Capacity<br>Market Buyer, or a Capacity Market Seller.  | not updated after FERC accepted the March 2020 Filing.  |
| 13. | Tariff, Definitions –<br>O-P-Q  | Chen Lu      | August 7, 2015, has an effective agreement that is the equivalent of   | Planned External Financed Generation Capacity Resource:<br>"Planned External Financed Generation Capacity Resource" shall mean<br>a Planned External Generation Capacity Resource that, prior to August<br>7, 2015, has an effective agreement that is the equivalent of-<br>fan Interconnection Service Agreement, has submitted to the Office of<br>the Interconnection the appropriate certification attesting achievement-<br>of Financial Close, and has secured at least 50 percent of the MWs of-<br>firm transmission service required to qualify such resource under the-<br>deliverability requirements of the Reliability Assurance Agreement. |   |
| 14. | Tariff, Definitions –<br>O-P-Q  | Chen Lu      | Planned Financed Generation Capacity Resource:<br>"Planned Financed Generation Capacity Resource" shall mean<br>a Planned Generation Capacity Resource that, prior to August 7,<br>2015, has an effective Interconnection Service Agreement and has<br>submitted to the Office of the Interconnection the appropriate<br>certification attesting achievement of Financial Close.   | Planned Financed Generation Capacity Resource:<br>-<br>"Planned Financed Generation Capacity Resource" shall mean-<br>a Planned Generation Capacity Resource that, prior to August 7, 2015,<br>has an effective Interconnection Service Agreement and has submitted-<br>to the Office of the Interconnection the appropriate certification-<br>attesting achievement of Financial Close.  | Planned Financed Generation Capacity<br>Resources only applied to resources prior to<br>August 2015. Specifically, PJM explained in<br>ER15-623-004 (Filed July 9, 2015; paragraph<br>E.2.b) that this term applied only for the 2015<br>BRA. This provision was previously<br>implemented to address concerns from a<br>stakeholder about resources fully financed<br>before 2015 BRA. Thus, this provision was<br>only applicable for 2015 BRA. |
| 15. | Operating<br>Agreement, Section<br>1 (Definitions O-P)                | Steve Pincus | "Other Supplier" shall mean a Member that: (i) is engaged in<br>buying, selling or transmitting electric energy, capacity, ancillatry<br>services, financial transmission rights or other services available<br>under PJM's governing documents in or through the Interconnection<br>or has a good faith intent to do so, and; (ii) does not qualify for the<br>Generation Owner, Electric Distributor, Transmission Owner or End<br>Use Customer sectors. | good faith intent to do so, and; (ii) does not qualify for the Generation   | PJM proposes to amend the Operating<br>Agreement, Section 1, definition of "Other   |

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| Æ | Operating<br>Agreement, Section<br>1 (Definitions S-T)                             | Steve Pincus |   | "Senior Standing Committees" shall mean the Members Committee,<br>and the Markets, and Reliability Committee, as established in<br>Operating Agreement, section 8.1 and Operating Agreement, section<br>8.6.  | PJM proposes to amend the Operating<br>Agreement, Section 1, Definitions of "Senior<br>Standing Committee" to correct a<br>typographical error by removing misplaced<br>comma.  |
|   | Tariff, Attachment<br>C, Methodology To<br>Assess Available<br>Transfer Capability | Steve Pincus | Flowgates are used in the AFC and ATC calculations. PJM adds or<br>eliminates external flowgates based on the Joint Operating<br>Agreement Between the Midwest Independent Transmission System<br>Operator, Inc. And PJM Interconnection, L.L.C. ("Midwest ISO<br>JOA", Article V (FERC Electric Tariff, First Revised Rate Schedule<br>No. 38, <i>see</i> , Section 4.2 – Cost of Data and Information Exchange up<br>to and including Section 5.1.12 – Coordination of Transmission<br>Reliability Margin Values); Joint Operating Agreement Among And<br>Between PJM Interconnection, L.L.C., And Progress Energy<br>Carolinas ("PEC JOA"), Article Five (FERC Electric Tariff, First<br>Revised Rate Schedule No. 50, <i>see</i> , Article 9 – Coordinated<br>Transmission Planning Studies up to and including Article 12 –<br>Managing Parallels Flow on the VACAR/PJM Interface ); and Joint<br>Reliability Coordination Agreement Among And Between Midwest<br>Independent Transmission System Operator, Inc., PJM<br>Interconnection, L.L.C., And Tennessee Valley Authority ("JRCA"),<br>Article Five (the JRCA is not a filed FERC rate schedule; however,<br>Article Five of the JRCA is identical to Article V of the Midwest<br>ISO JOA and Article Five of the PEC JOA). PJM adds or eliminates<br>internal flowgates, at least annually, based on a review of historic<br>operating constraints including flowgates that have been in<br>Transmission Loading Relief (TLR) and other operating conditions | Section 4.2 – Cost of Data and Information Exchange up to and<br>including Section 5.1.12 – Coordination of Transmission Reliability<br>Margin Values); Joint Operating Agreement Among And Between<br>PJM Interconnection, L.L.C., And Progress Energy Carolinas ("PEC<br>JOA"), Article Five (FERC Electric Tariff, First Revised Rate Schedule<br>No. 50, <i>see</i> , Article 9 – Coordinated Transmission Planning Studies up<br>to and including Article 12 – Managing Parallels Flow on the<br>VACAR/PJM Interface ); and Joint Reliability Coordination<br>Agreement Among And Between Midwest Independent Transmission-<br>System Operator, Inc., PJM Interconnection, L.L.C., And Tennessee | <ul> <li>PJM amends Tariff, Attachment C, External Flowages methodology description of the JRCA to address the following changes: <ol> <li>The Midwest Independent System Transmission Operator withdrew from the JRCA in 2014; and</li> </ol> </li> <li>On June 6, 2023, in Docket No. ER23-2078-000, PJM filed a revised JRCA to add Louisville Gas and Electric Company and Kentucky Utilities as parties to the JRCA. FERC accepted the revised JRCA effective August 5, 2023, in a letter order issued on August 3, 2023.</li> </ul> |

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| 18. | Operating<br>Agreement,<br>Schedule 6, section<br>1.5.5 (b)           | Steve Pincus | Plan(b)The Regional Transmission Expansion Plan shall be<br>developed taking into account the processes for coordinated regional<br>transmission expansion planning established under the following | <ul> <li>1.5.5 Coordination of the Regional Transmission Expansion Plan</li> <li>(b) The Regional Transmission Expansion Plan shall be developed taking into account the processes for coordinated regional transmission expansion planning established under the following agreements: <ul> <li>Joint Operating Agreement Between the Midwest Independent System Operator, Inc. and PJM Interconnection, L.L.C., which is found at http://www.pjm.com/~/media/documents/agreements/joacomplete.ashx;</li> <li>Northeastern ISO/RTO Planning Coordination Protocol, which is described at Schedule 6-B and found at http://www.pjm.com/~/media/documents/agreements/northeas tern-iso-rto-planning-coordination-protocol.ashx;</li> <li>Joint Operating Agreement Among and Between New York Independent System Operator Inc., which is found at http://www.pjm.com/~/media/documents/agreements/nyiso-pjm.ashx;</li> <li>Interregional Transmission Coordination Between the SERTP and PJM Regions, which is found at Operating Agreement, Schedule 6-A</li> <li>Allocation of Costs of Certain Interregional Transmission Projects Located in the PJM and SERTP Regions, which is located at Tariff, Schedule 12-B;</li> <li>Joint Reliability Coordination Agreement Between the-Midwest Independent System Operator, Inc.; PJM Interconnection, L.L.C., Tennessee Valley Authority, and Louisville Gas and Electric Company and Kentucky Utilitiesand Progress Energy Carolinas.</li> </ul> </li> </ul> | On June 6, 2023, in Docket No. ER23-2078-<br>000, PJM filed a revised JRCA to add<br>Louisville Gas and Electric Company and<br>Kentucky Utilities as parties to the JRCA.<br>FERC accepted the revised JRCA effective<br>August 5, 2023, in a letter order issued on |
| 19. | Tariff, Att. Q,<br>Section B.2  | Chen Lu      | specified in section VI.B.1 above, other than Price Responsive<br>Demand, the credit requirement shall be the RPM Auction Credit  | Except as provided for Credit-Limited Offers below, for any resource<br>specified in section VI.B.1 above, other than Price Responsive<br>Demand, the credit requirement shall be the RPM Auction Credit Rate,<br>as provided in section VI.B.4 below, times the megawatts to be offered  |   |

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|     |   |         | offered for sale from such resource in an RP.<br>Qualified Transmission Upgrades, the credit<br>based on the Locational Deliverability Area<br>was to increase the Capacity Emergency Tra<br>the credit requirement for Planned Financed<br>Resources and Planned External Financed G<br>Resources shall be one half of the product of<br>Credit Rate, as provided in section VI.B.4 be<br>megawatts to be offered for sale from such re<br>Pricing Model Auction. | requirements shall be<br>in which such upgrade<br>insfer Limit. However,<br>Generation Capacity<br>eneration Capacity<br>f the RPM Auction<br>elow, times the | for sale from such resource in an RPM Au<br>Transmission Upgrades, the credit require<br>the Locational Deliverability Area in whic<br>increase the Capacity Emergency Transfer<br>requirement for Planned Financed General<br>Resources and Planned External Financed<br>Resources shall be one half of the product<br>Rate, as provided in section VI.B.4 belowy<br>offered for sale from such resource in a Re-<br>Auction. | ments shall be based on<br>th such upgrade was to<br>Limit. However, the credit-<br>tion Capacity-<br>Generation Capacity-<br>of the RPM Auction Credit-<br>times the megawatts to be- | This provision was previously implemented<br>to address concerns from a stakeholder about<br>resources fully financed before 2015 BRA.<br>Thus, this provision was only applicable for<br>2015 BRA. |
| 20. | Tariff, Att. Q,<br>Section B.3 (e)                                    | Chen Lu | For Planned Financed Generation Capacity I<br>the PJM Region, the RPM Auction Credit re<br>reduced as the Capacity Resource attains the<br>following table and as further described in th<br>eduction Milestones for Planned Financed  | quirement shall be<br>milestones stated in the<br>ne PJM Manuals.   | as the Capacity Resource attains the miles<br>table and as further described in the PJM P<br>-   | requirement shall be reduced<br>tones stated in the following<br>Manuals.  | that this term applied only for the 2015 BRA.<br>This provision was previously implemented<br>to address concerns from a stakeholder about<br>resources fully financed before 2015 BRA.             |
|     |   |         | Milestones   | Increment of<br>initial RPM Auct<br>m   | i Milestones   | Increment of r<br>initial RPM Auction<br>me  | 2015 BRA.   |
|     |   |         | eed  |   | c<br>) <del>ceed</del>   | <u>50</u>  |   |
|     |   |         | Construction (e.g., footers poured)  |   | f Construction (e.g., footers poured)  | 15   |   |
|     |   |         | ating Equipment Delivered  |   | Prating Equipment Delivered  | 10   | <u>9</u>  |
|     |   |         | Interconnection Service  | 2:  | f Interconnection Service  | 25   | <u>0</u> ,  |
|     |   |         | To obtain a reduction in its RPM Auction Cr<br>the Market Participant must demonstrate sati<br>applicable milestone in the same manner as<br>Generation Capacity Resources in subsection   | isfaction of the set forth for Planned  | -<br>To obtain a reduction in its RPM Auction<br>the Market Participant must demonstrate s<br>milestone in the same manner as set forth<br>Capacity Resources in subsection (c) abov   | atisfaction of the applicable-<br>for Planned Generation-  |   |
| 21. | Tariff, Att. Q,<br>Section B.3 (f)                                    | Chen Lu | For Planned External Financed Generation C<br>RPM Auction Credit Requirement shall be re<br>Resource attains the milestones stated in the<br>further described in the PJM Manuals; provide   | educed as the Capacity following table and as   | For Planned External Financed Generation<br>RPM Auction Credit Requirement shall be<br>Resource attains the milestones stated in the<br>further described in the PJM Manuals; pro  | e reduced as the Capacity<br>he following table and as-  | Only applied to resources prior to August<br>2015. Specifically, PJM explained in ER15-<br>623-004 (Filed July 9, 2015; paragraph E.2.b<br>that this term applied only for the 2015 BRA.            |

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|  |       | quotient of (i) the MWs of firm transmission ser<br>Participant has secured for the complete transmi<br>(ii) the MWs of firm transmission service requir<br>resource under the deliverability requirements of<br>Assurance Agreement. | lanned External<br>be no greater than the<br>vice that the Market<br>ssion path divided by<br>ed to qualify such<br>f the Reliability | percentage reduction in the RPM Auction Credit<br>including the initial 50% reduction for being a P.<br>eFinanced Generation Capacity Resources, shall be<br>quotient of (i) the MWs of firm transmission ser<br>y Participant has secured for the complete transmis<br>(ii) the MWs of firm transmission service require<br>resource under the deliverability requirements of<br>Assurance Agreement.<br>-<br><b>Reduction Milestones for Planned External F</b> | lanned External<br>be no greater than the-<br>vice that the Market-<br>ssion path divided by-<br>ed to qualify such-<br>the Reliability- | This provision was previously implemented<br>to address concerns from a stakeholder about<br>resources fully financed before 2015 BRA.<br>Thus, this provision was only applicable for<br>2015 BRA. |
|  |       | Milestones  | Increment of a initial RPM Auct   | r<br>i <del>Milestones</del>  | Increment of re<br>initial RPM Auction   | 2   |
|  |       | eed   | <u> </u>  | e<br>0 <mark>eeed</mark>  | 50 <sup>0</sup>  |   |
|  |       | Construction (e.g., footers poured)   |   | 5 <mark>f Construction (e.g., footers poured)</mark>  | 159  |   |
|  |       | ating Equipment Delivered   |   | 0rating Equipment Delivered   | 10   |   |
|  |       | Interconnection Service   |   | 5 f Interconnection Service   | 259  | 4   |
|  |       | To obtain a reduction in its RPM Auction Credit<br>the Market Participant must demonstrate satisfact<br>applicable milestone in the same manner as set f<br>Generation Capacity Resources in subsection (c                            | ction of the<br>forth for Planned<br>) above.   | -<br>To obtain a reduction in its RPM Auction Credit<br>the Market Participant must demonstrate satisfac<br>milestone in the same manner as set forth for Pla<br>Capacity Resources in subsection (c) above.  | tion of the applicable-<br>nned Generation   |   |
| 22. Tariff, Attachme   |       | (g) A Capacity Market Seller that owns or contr   |   | (g) A Capacity Market Seller that owns or contro  |  | This corrects the relevant provisions since   |
| DD, section 5.6.   | 1 (g) | Capacity Storage Resources, Intermittent Resou  |   | Capacity Storage Resources, Intermittent Resour   |  | only Tariff, Attachment DD, section 5.14 (h-  |
|  |       | Resources, or Energy Efficiency Resources may<br>as a Capacity Performance Resource in a MW q   |   | Resources, or Energy Efficiency Resources may<br>a Capacity Performance Resource in a MW quar   |  | 2) is currently effective. The other references to subsections (h) and (h-1) have sunset dates  |
|  |       | with their average expected output during peak-   |   | their average expected output during peak-hour  |  | built into those sections that have since   |
|  |       | Alternatively, a Capacity Market Seller that own  | ns or controls one or   | a Capacity Market Seller that owns or controls o  | ne or more Capacity  | passed.   |
|  |       | more Capacity Storage Resources, Intermittent I   |   | Storage Resources, Intermittent Resources, Dem  |  | r l   |
|  |       | Resources, Energy Efficiency Resources, or Env  |   | Efficiency Resources, or Environmentally-Limit  |  |   |
|  |       | Limited Resources may submit a Sell Offer whi   |   | submit a Sell Offer which represents the aggrega  |  |   |
|  |       | aggregated Unforced Capacity value of such res  | ources, where such  | value of such resources, where such Sell Offer sl   | hall be considered to be   |   |

| Governing<br>Document,<br>Agreement,<br>Attachment,                 | Source  | Current Language   | Proposed Revisions  | Rationale/Notes   |
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| Section, Title         23. Tariff, Attachment DD, section 5.6.6 (b) | Chen Lu | <ul> <li>Seller, including all such resources obtained through bilateral contract and reported to the Office of the Interconnection in accordance with the Office of the Interconnection's rules related to its <i>Capacity Exchange</i> tools. If any of the commercially aggregated resources in such Sell Offer are subject to the Minimum Floor Offer Price pursuant to Tariff, Attachment DD, sections 5.14(h) and 5.14(h-1), the Capacity Market Seller that owns or controls such resources may submit a Sell Offer with a Minimum Floor Offer Pric of no lower than the time and MW weighted average of the applicable MOPR Floor Offer Prices (zero if not applicable) of the aggregated resources in such Sell Offer.</li> <li>(b) The Office of the Interconnection shall determine the quantity of installed capacity available for sale in a Base Residual Auction or Incremental Auction as of the beginning of the period during which Buy Bids and Sell Offers are accepted for such auctior as applicable, in accordance with the time schedule set forth in the PJM Manuals. Removal of a resource from Capacity Resource status shall not be reflected in the determination of available installed capacity unless the associated unit-specific bilateral transaction is approved, the designation of such resource (or portion thereof) as a network resource for the external load is demonstrated to the Office of the Interconnection, or equivalent evidence of a firm external sale is provided prior to the deadline established therefor. The determination of available installed capacity shall also take into account, as they apply in proportion to the share of each resource owned or controlled by a Capacity Market Seller, any approved capacity modifications, and existing capacity commitments established in a prior RPM Auction, an FRR Capacity Plan, Locational UCAP transactions and/or replacement capacity transactions to make this determination, no bilateral</li> </ul> | of installed capacity available for sale in a Base Residual Auction or<br>Incremental Auction as of the beginning of the period during which<br>Buy Bids and Sell Offers are accepted for such auction, as applicable,<br>in accordance with the time schedule set forth in the PJM Manuals.<br>Removal of a resource from Capacity Resource status An external sale<br>of capacity shall not be reflected in the determination of available<br>installed capacity unless the associated unit-specific bilateral<br>transaction is approved, the designation of such resource (or portion<br>thereof) as a network resource for the external load is demonstrated to<br>the Office of the Interconnection, or equivalent evidence of a firm<br>external sale is provided prior to the deadline established therefor. The<br>determination of available installed capacity shall also take into<br>account, as they apply in proportion to the share of each resource<br>owned or controlled by a Capacity Market Seller, any approved<br>capacity modifications, and existing capacity commitments established<br>in a prior RPM Auction, an FRR Capacity Plan, Locational UCAP<br>transactions and/or replacement capacity transactions under this Tariff, | This correction replaces the reference to<br>removal of a resource from Capacity<br>Resource status, which is detailed in Tariff,<br>Attachment DD, section 6.6(g). The corrected<br>language should refer to an external sale of<br>capacity for the rest of the sentence to better<br>describe the intended language of this<br>sentence, which refers to bilateral<br>transactions for resources designated as a<br>network resource for external loads or firm<br>external sales. |

| Doc<br>Agre<br>Atta                    | verning<br>oument,<br>eement,<br>chment,<br>on, Title | Source  | Current Language   | Proposed Revisions   | Rationale/Notes   |
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|  |   |         | submission of Sell Offers and Buy Bids, as appropriate, for that auction until completion of the clearing determination for such   | the beginning of the period for submission of Sell Offers and Buy Bids,<br>as appropriate, for that auction until completion of the clearing<br>determination for such auction. Processing of such bilateral<br>transactions will reconvene once clearing for that auction is completed.<br>A Generation Capacity Resource located in the PJM Region shall not<br>be removed from Capacity Resource status to the extent the resource is<br>committed to service of PJM loads as a result of an RPM Auction, FRR<br>Capacity Plan, Locational UCAP transaction and/or by designation as a<br>replacement resource under this Tariff, Attachment DD.  |   |
| 24. Tariff, At<br>DD, secti<br>(b)(ii) |   | Chen Lu | a Scheduled Incremental Auction is triggered by Tariff, Attachment<br>DD, section $5.4(c)(1)$ , and the conditions stated in Tariff, Attachment<br>DD, section $5.4(c)(2)$ do not apply, the Office of the<br>Interconnection first shall determine the total quantity of (A) the<br>amount that the Office of the Interconnection sought to procure in<br>prior Scheduled Incremental Auctions for such Delivery Year that<br>does not clear such auction, minus (B) the amount that the Office of<br>the Interconnection sought to sell back in prior<br>Scheduled Incremental Auctions for such Delivery Year that does<br>not clear such auction, plus (C) the difference between the<br>updated PJM Region Reliability Requirement or<br>updated LDA Reliability Requirement and, respectively, the PJM<br>Region Reliability Requirement, or LDA Reliability Requirement,<br>utilized in the most recent prior auction conducted for such Delivery<br>Year plus any amount required by section $5.4(c)(2)(ii)$ , plus (D) the<br>reduction in Unforced Capacity commitments associated with the<br>transition provisions of Tariff, Attachment DD, sections $5.14B$ ,<br>5.14C, $5.14E$ , and $5.5A(c)(i)(B)$ and RAA, Schedule 6, section<br>L.9. If the result of such equation is a positive quantity, the Office of<br>the Interconnection shall employ in the clearing of such auction a<br>portion of the Updated VRR Curve Increment extending right from | DD, section 5.4(c)(1), and the conditions stated in Tariff, Attachment<br>DD, section 5.4(c)(2) do not apply, the Office of the<br>Interconnection first shall determine the total quantity of (A) the<br>amount that the Office of the Interconnection sought to procure in<br>prior Scheduled Incremental Auctions for such Delivery Year that does<br>not clear such auction, minus (B) the amount that the Office of the<br>Interconnection sought to sell back in prior Scheduled Incremental<br>Auctions for such Delivery Year that does not clear such auction, plus<br>(C) the difference between the updated PJM Region Reliability<br>Requirement or updated LDA Reliability Requirement and,<br>respectively, the PJM Region Reliability Requirement, or LDA<br>Reliability Requirement, utilized in the most recent prior auction<br>conducted for such Delivery Year plus any amount required by section<br>5.4(c)(2)(ii), plus (D) the reduction in Unforced Capacity commitments<br>associated with the transition provisions of Tariff, Attachment DD,<br>sections 5.14B, and 5.14C,5.14E, and 5.5A(c)(i)(B) and<br>RAA, Schedule 6, section L.9. If the result of such equation is a<br>positive quantity, the Office of the Interconnection shall employ in the<br>clearing of such auction a portion of the Updated VRR Curve<br>Increment extending right from the left-most point on that curve in a<br>megawatt amount equal to that positive quantity defined above, to seek | Tariff, Attachment DD, sections 5.14B,<br>5.14C, and 5.14E no longer exist in the tariff. |

|     | Governing                     | Source  | Current Language  | Proposed Revisions  | Rationale/Notes                                 |
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|     | Document,<br>Agreement,       |         |   |   |   |
|     | Attachment,<br>Section, Title |         |   |   |   |
|     |                               |         | the result of such equation is a negative quantity, the Office of the   | quantity, the Office of the Interconnection shall employ in the clearing    |   |
|     |                               |         | Interconnection shall employ in the clearing of the auction a portion   |   |   |
|     |                               |         | of the Updated VRR Curve Decrement, extending and ascending to<br>the left from the right-most point on that curve in a megawatt amount     | extending and ascending to the left from the right-most point on that       |   |
|     |                               |         | corresponding to the negative quantity defined above, to seek to sell   |   |   |
|     |                               |         | back such quantity.   | defined above, to seek to sen back such quantity.                           |   |
| 25. |                               | Chen Lu | (iii)When the possible need to seek agreements to release capacity  | (iii)When the possible need to seek agreements to release capacity          | Tariff, Attachment DD, sections 5.14B,          |
|     | DD, section 5.12 (b)          |         |   | commitments in any Scheduled Incremental Auction is indicated for           | 5.14C, and 5.14E no longer exist in the tariff. |
|     | (iii)                         |         | the PJM Region or any LDA by Tariff, Attachment DD, section   | the PJM Region or any LDA by Tariff, Attachment DD, section                 |   |
|     |                               |         |   | (5.4(c)(3)(i)), the Office of the Interconnection first shall determine the |   |
|     |                               |         | total quantity of (A) the amount that the Office of the   | total quantity of (A) the amount that the Office of the Interconnection     |   |
|     |                               |         | Interconnection sought to procure in prior Scheduled Incremental  | sought to procure in prior Scheduled Incremental Auctions for               |   |
|     |                               |         | Auctions for such Delivery Year that does not clear such auction,<br>minus (B) the amount that the Office of the Interconnection sought to  | such Delivery Year that does not clear such auction, minus (B) the          |   |
|     |                               |         |   | prior Scheduled Incremental Auctions for such Delivery Year that does       |   |
|     |                               |         | Year that does not clear such auction, plus (C) the difference  | not clear such auction, plus (C) the difference between the                 |   |
|     |                               |         | between the updated PJM Region Reliability Requirement or updated   |   |   |
|     |                               |         | LDA Reliability Requirement and, respectively, the PJM Region   | Reliability Requirement and, respectively, the PJM Region Reliability       |   |
|     |                               |         | Reliability Requirement, or LDA Reliability Requirement, utilized in  |   |   |
|     |                               |         | the most recent prior auction conducted for such Delivery Year  | recent prior auction conducted for such Delivery Year minus any             |   |
|     |                               |         | minus any capacity sell-back amount determined by PJM to be   | capacity sell-back amount determined by PJM to be required for the          |   |
|     |                               |         | required for the PJM Region or such LDA by Tariff, Attachment   | PJM Region or such LDA by Tariff, Attachment DD, section                    |   |
|     |                               |         | DD, section 5.4(c)(3)(ii), plus (D) the reduction in Unforced   | 5.4(c)(3)(ii), plus (D) the reduction in Unforced Capacity commitments      |   |
|     |                               |         | Capacity commitments associated with the transition provisions of   | associated with the transition provisions of Tariff, Attachment DD,         |   |
|     |                               |         | Tariff, Attachment DD, sections 5.14B, 5.14C, 5.14E, and  | sections 5.14B, 5.14C, 5.14E, and 5.5A(c)(i)(B) and RAA, Schedule 6,        |   |
|     |                               |         | 5.5A(c)(i)(B) and RAA, Schedule 6, section L.9, provided, however,  |   |   |
|     |                               |         | that the amount sold in total for all LDAs and the PJM Region   | LDAs and the PJM Region related to a delay in a Backbone                    |   |
|     |                               |         | related to a delay in a Backbone Transmission upgrade may not   | Transmission upgrade may not exceed the amounts purchased in total          |   |
|     |                               |         | exceed the amounts purchased in total for all LDAs and the PJM  | for all LDAs and the PJM Region related to a delay in a Backbone            |   |
|     |                               |         | Region related to a delay in a Backbone Transmission upgrade. If  | Transmission upgrade. If the result of such equation is a positive          |   |
|     |                               |         | the result of such equation is a positive quantity, the Office of the   | quantity, the Office of the Interconnection shall employ in the clearing    |   |
|     |                               |         | Interconnection shall employ in the clearing of such auction a portior<br>of the Updated VRR Curve Increment extending right from the left- |   |   |
|     |                               |         |   | megawatt amount equal to that positive quantity defined above, to seek      |   |
|     |                               |         |   | to procure such quantity. If the result of such equation is a negative      |   |
|     |                               |         | quantity defined above, to seek to procure such quantity. If the result   | the produce such quantity. If the result of such equation is a negative     |   |

|     | Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Source  | Current Language   | Proposed Revisions  | Rationale/Notes   |
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|     |   |         | the left from the right-most point on that curve in a megawatt amount<br>corresponding to the negative quantity defined above, to seek to sell<br>back such quantity.  | extending and ascending to the left from the right-most point on that<br>curve in a megawatt amount corresponding to the negative quantity<br>defined above, to seek to sell back such quantity.  |   |
| 26. | Tariff, Attachment<br>DD, Section 5.14                                | Chen Lu | system capacity for the PJM Region, without considering locational   | and Incremental Auction, the Office of the Interconnection shall<br>calculate a clearing price to be paid for each megawatt-day of Unforced<br>Capacity that clears in such auction. The Capacity Resource Clearing<br>Price for each LDA will be the marginal value of system capacity for<br>the PJM Region, without considering locational constraints, adjusted as<br>necessary by any applicable Locational Price Adders, <u>Annual Resource<br/>Price Adders, Extended Summer Resource Price Adders, Limited<br/>Resource Price Decrements, Sub-Annual Resource Price Decrements,<br/>Base Capacity Demand Resource Price Decrements, and Base Capacity</u> | Price Decrements, Sub-Annual Resource<br>Price Decrements, Base Capacity Demand                     |
| 27. | Tariff, Attachment<br>DD, Section 5.14 (e)                            | Chen Lu | and other adjustments as described in Tariff, Attachment DD, section 5.14B, Tariff, Attachment DD, section 5.14C, Tariff, Attachment DD, section 5.14D, Tariff, Attachment DD, section 5.14E and Tariff, Attachment DD, section 5.15) equal to such LSE's Daily Unforced | shall incur a Locational Reliability Charge (subject to certain offsets<br>and other adjustments as described in Tariff, Attachment DD, section<br>5.14B, Tariff, Attachment DD, section 5.14C, Tariff, Attachment DD,  | Tariff, Attachment DD, sections 5.14B,<br>5.14C, 5.14D, and 5.14E no longer exist in<br>the tariff. |

|     | Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title  | Source       | Current Language  | Proposed Revisions  | Rationale/Notes   |
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|     |  |              | PJMSettlement shall be the Counterparty to the LSEs' obligations to pay, and payments of, Locational Reliability Charges.   | shall be the Counterparty to the LSEs' obligations to pay, and payments of, Locational Reliability Charges.   |   |
| 28. | Tariff, Attachment<br>DD, Section 6.8 (c)  | Chen Lu      | (c) Variable costs that are directly attributable to the production<br>of energy shall be excluded from a Market Seller's generation<br>resource Avoidable Cost Rate. Notwithstanding the foregoing, a<br>Market Seller that included variable costs attributable to the<br>production of energy in a generation resource's Avoidable Cost Rate<br>prior to April 15, 2019 shall not include such costs in such<br>generation resource's Maintenance Adders or Operating Costs for<br>any Delivery Year for which it has already included such costs in the<br>generation resource's Avoidable Cost Rate. A Market Seller<br>implicated by this paragraph may continue including such variable<br>costs attributable to the production of energy in its Avoidable Cost<br>Rate for each generation resource for any Delivery Year for which it<br>already did so prior to April 15, 2019. | of energy shall be excluded from a Market Seller's generation resource<br>Avoidable Cost Rate. Notwithstanding the foregoing, a Market Seller-<br>that included variable costs attributable to the production of energy in a<br>generation resource's Avoidable Cost Rate prior to April 15, 2019 shall<br>not include such costs in such generation resource's Maintenance-<br>Adders or Operating Costs for any Delivery Year for which it has-<br>already included such costs in the generation resource's Avoidable<br>Cost Rate. A Market Seller implicated by this paragraph may continue-<br>including such variable costs attributable to the production of energy in<br>its Avoidable Cost Rate for each generation resource for any Delivery- | included prior to April 15, 2019. This<br>sentence is now obsolete so this outdated<br>sentence can be deleted. |
| 29. | Operating<br>Agreement, Section<br>1 (Definitions E-F)<br>Reliability<br>Assurance<br>Agreement,<br>Schedule 1,<br>Definitions | Steve Pincus | over the same time period; or (2) the average energy produced by the<br>Member and its affiliates within the PJM region over the five<br>Planning Periods immediately preceding the relevant Planning<br>Period does not exceed the average energy consumed by that<br>Member and its affiliates within the PJM region over the same time   | average physical unforced capacity owned by the Member and its affiliates in the PJM region over the five Planning Periods immediately  | reference to "End-Use Customer" at the end<br>of that definition.   |

| Governing<br>Document,<br>Agreement,   | Source  | Current Language  | Proposed Revisions  | Rationale/Notes  |
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| Attachment,<br>Section, Title  |         |   |   |  |
| Tariff, Attachment<br>DD-1, section L.1,<br>and<br>RAA, Schedule 6,<br>section L.1 | Chen Lu | achieve a continuous (during peak summer and winter periods as<br>described herein) reduction in electric energy consumption at the<br>End-Use Customer's retail site that is not reflected in the peak load<br>forecast prepared for the Delivery Year for which the Energy<br>Efficiency Resource is proposed, and that is fully implemented at all | An Energy Efficiency Resource is a project, including installation of<br>more efficient devices or equipment or implementation of more<br>efficient processes or systems, exceeding then-current building codes,<br>appliance standards, or other relevant standards, designed to achieve a<br>continuous (during peak summer and winter periods as described<br>herein) reduction in electric energy consumption at the Eend-Uuse<br>Ccustomer's retail site that is not reflected in the peak load forecast<br>prepared for the Delivery Year for which the Energy Efficiency<br>Resource is proposed, and that is fully implemented at all times during<br>such Delivery Year, without any requirement of notice, dispatch, or<br>operator intervention. | This update makes the description of Energy<br>Efficiency consistent with the RAA<br>definitions of Energy Efficiency Resource,<br>Annual Energy Efficiency Resource, and<br>Summer-Period Energy Efficiency Resource.<br>Additionally, this update makes consistent<br>use of the lowercase term "end-use customer"<br>which is found 22 times in Schedule 6 that<br>describes Energy Efficiency and Demand<br>Response Resources while "End-Use<br>Customer" is found only once.<br>Moreover, throughout PJM's governing<br>documents, the defined term "End-Use<br>Customer" is applicable only in one context,<br>which is exclusively focused on establishing<br>the qualifications for a PJM Member to be an<br>End-Use Customer. The RAA defines an<br>"End-Use Customer" as "a Member that is a<br>retail end-user of electricity within the PJM<br>Region." The definition then goes on to detail<br>that "[f]or purposes of Members Committee<br>sector classification, a Member that is a retail<br>end-use rust of seneration may qualify as<br>an End-Use customer if" certain conditions are<br>met. Finally, the definition concludes that<br>"[t]he foregoing notwithstanding, taking retail<br>service may not be sufficient to qualify a<br>Member as an End-Use Customer."<br>The original 2008 filing establishing rules for<br>Energy Efficiency Resources did not include<br>this "End-Use Customer" definition or<br>reference end-use customers at all in the<br>transmittal letter or in the proposed governing |

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|  |               |  |  | document language.1 This inadvertent<br>capitalization resulted from PJM's October<br>26, 2010 filing in Docket No. ER11-1909-000,<br>in which PJM added the term "End-Use<br>Customer" to the description of Energy<br>Efficiency Resource in section L.1.2 That<br>filing was only meant to clarify that upgrades<br>to existing equipment of the transmission and<br>distribution systems did not qualify as Energy<br>Efficiency Resources and that such resources<br>were intended to be limited to installations<br>behind an end-use customer similar to what<br>other RTO/ISOs had done around that time.3<br>There was no specific mention that this<br>addition was intended to also limit Energy<br>Efficiency Resources to only PJM Members in<br>that filing. |
| Tariff, Attachment<br>K-Appendix, Section<br>1.5A.10<br>&<br>OA, Schedule 1,<br>Section 1.5A.10,<br>Aggregation for<br>Economic Load<br>Response<br>Registrations. | Daniel Vinnik | alternative opportunity to participate on an individual basis or can<br>provide less than 0.1 megawatt of demand response in the Secondary<br>Reserve, Synchronized Reserve or Regulation markets when they<br>currently have no alternative opportunity to participate on an<br>individual basis. Aggregations pursuant to section 1.5A.1 above shall | The purpose for aggregation is to allow the participation of Eend-Uuse Ccustomers in the Energy Market that can provide less than 0.1 megawatt of demand response when they currently have no alternative opportunity to participate on an individual basis or can provide less than 0.1 megawatt of demand response in the Secondary Reserve, Synchronized Reserve or Regulation markets when they currently have no alternative opportunity to participate on an individual basis. Aggregations pursuant to section 1.5A.1 above shall be subject to the following requirements: | resulting in inadvertent capitalizations of the<br>term "end-use customer" from prior to 2010.<br>PJM has implemented this section consistent  |

<sup>&</sup>lt;sup>1</sup> *PJM Interconnection, L.L.C.*, Transmittal Letter, Docket No. ER09-412-000 (Dec. 12, 2008).

<sup>3</sup> *See id.* at 1-2.

<sup>&</sup>lt;sup>2</sup> *PJM Interconnection, L.L.C.*, Transmittal Letter, Docket No. ER11-1908-000 (Oct. 26, 2010).

| Governing Source<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Current Language  | Proposed Revisions  | Rationale/Notes  |
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|  | <ul> <li>in the aggregation must also be part of the same Synchronized Reserve sub-zone;</li> <li>iii. All End-Use Customers in an aggregation that settle at Transmission Zone, existing load aggregate, or node prices shall be located in the same Transmission Zone, existing load aggregate or at the same node, respectively;</li> <li>v. If the aggregation will only provide energy to the market then only one End-Use Customer within the aggregation shall have the ability to reduce more than 0.099 megawatt of load unless the</li> </ul> | by the same electric distribution company or Load Serving Entity<br>where the electric distribution company is the Load Serving Entity for<br>all Eend-Uuse Ccustomers in the aggregation. Residential customers<br>that are part of an aggregate that does not participate in the Day- Ahead<br>Energy Market do not need to share the same Load Serving Entity. If<br>the aggregation will provide Synchronized Reserves, all customers in<br>the aggregation must also be part of the same Synchronized Reserve<br>sub-zone;<br>iii. All Eend-Uuse Ccustomers in an aggregation that settle at<br>Transmission Zone, existing load aggregate, or node prices shall be<br>located in the same Transmission Zone, existing load aggregate or at<br>the same node, respectively;<br>v. If the aggregation will only provide energy to the market then<br>only one Eend-Uuse Ccustomer within the aggregation shall have the<br>ability to reduce more than 0.099 megawatt of load unless the<br>.Curtailment Service Provider, Load Serving Entity and PJM approve. I<br>the aggregation will provide an Ancillary Service to the market then<br>only one Eend-Uuse Ccustomer within the aggregation shall have the<br>ability to reduce more than 0.099 megawatt of load unless the<br>.Curtailment Service Provider, Load Serving Entity and PJM approve. I<br>the aggregation will provide an Ancillary Service to the market then<br>only one Eend-Uuse Ccustomer within the aggregation shall have the<br>ability to reduce more than 0.099 megawatt of load unless the<br>Curtailment Service Provider, Load Serving Entity and PJM approve;<br>vi. Each Eend-Uuse Ccustomer site must meet the requirements<br>for market participation by an Economic Load Response Participant<br>resource except for the 0.1 megawatt minimum load reduction<br>requirement for energy or the 0.1 megawatt minimum load reduction | d These provisions were first included in a<br>March 18, 2010 filing in Docket No. ER09-<br>1063-003, responding to a Commission<br>directive from its December 18, 2009 order.<br><i>See PJM Interconnection, L.L.C.</i> , 129 FERC<br>¶ 61,250, at P 45 (2009). That order directed<br>PJM to modify the Tariff and OA to reflect<br>the aggregation rules for demand response<br>resources and to make conforming changes to<br>aggregation rules in PJM Manuals.<br>Accordingly, the stated purpose of this<br>revision was to have "[i]ncorporated the<br>aggregation rules, as directed." <i>See PJM</i><br><i>Interconnection, L.L.C.</i> , Transmittal Letter, |

|     | Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Source        | Current Language  | Proposed Revisions  | Rationale/Notes   |
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|     |   |               | Ancillary Services markets shall be administered under one  | vii. An Eend-Uuse Ccustomer's participation in the Energy and<br>Ancillary Services markets shall be administered under one economic<br>registration. | classification, a Member that is a retail end-<br>user that owns generation may qualify as an<br>End-Use customer if" certain conditions are<br>met. Finally, the definition concludes that<br>"[t]he foregoing notwithstanding, taking retail<br>service may not be sufficient to qualify a<br>Member as an End-Use Customer." As<br>detailed above, this definition of an End-Use<br>Customer is not pertinent to the Economic<br>Load Response Participants; rather, its<br>primary purpose relates to PJM's governance. |
| 32. | Tariff, Attachment  | Daniel Vinnik | The purpose for aggregation is to allow the participation of End-Use  | The purpose for aggregation is to allow the participation of Eend-Uuse  | Corrections made for scrivener's error  |
|     | K-Appendix, section<br>8.11   |               | Customers in the Emergency Load Response and Pre-Emergency<br>Load Response Programs that can provide less than 100 kW of     | Coustomers in the Emergency Load Response and Pre-Emergency<br>Load Response Programs that can provide less than 100 kW of demand                     | resulting in inadvertent capitalizations of the   |
|     | &   |               | demand response on an individual basis. Emergency Load Response   | response on an individual basis. Emergency Load Response and Pre-<br>Emergency Load Response Participant aggregations shall be subject to             | DIM has implemented this section consistent   |
|     | Operating<br>Agreement,<br>Schedule 1, Section                        |               |   | the following requirements:   | with stakeholder intent and industry<br>understanding, which is not to limit  |
|     | 8.11, Emergency<br>Load Response and                                  |               | i. All End-Use Customers in an aggregation shall be specifically identified;  | i. All Eend-Uuse Ccustomers in an aggregation shall be specifically identified;   | aggregation of end-use customers to only<br>PJM Members, for over 14 years.   |
|     | Pre-Emergency<br>Load Response<br>Participant                         |               | ii. All End-Use Customers in an aggregation shall be served by the same electric distribution company ;                       | ii. All Eend-Uuse C customers in an aggregation shall be served by the same electric distribution company ;   | Limiting this section's applications to only<br>allow aggregation of end-use customers that   |
|     | Aggregation.  |               | iii. All End-Use Customers in an aggregation that settle at   | iii. All Eend-Uuse Coustomers in an aggregation that settle at  | are also PJM members would cause significant market disruption and unsettle   |
|     |   |               |   | Transmission Zone, existing load aggregate, or node prices shall be   | long-standing expectations of PJM's demand  |
|     |   |               | located in the same Transmission Zone, existing load aggregate or at  | located in the same Transmission Zone, existing load aggregate or at  | response programs.  |
|     |   |               | the same node, respectively;  | the same node, respectively;  |   |
|     |   |               | iv Energy settlement will be based on each individual   | iv. Energy settlement will be based on each individual customer's   | These provisions were first included in a   |
|     |   |               | iv. Energy settlement will be based on each individual customer's load reductions, or a current statistical sample of end-use |   | 1063-003, responding to a Commission  |
|     |   |               | customers' load reductions, or a current statistical sample of end-use  |   | directive from its December 18, 2009 order.   |
|     |   |               | Load Control customers as set forth in the PJM Manuals, pursuant to   | Control customers as set forth in the PJM Manuals, pursuant to section  | See PJM Interconnection, L.L.C., 129 FERC   |
|     |   |               | section 3.3A of Schedule 1 of this Agreement, the PJM Reliability   | 3.3A of Schedule 1 of this Agreement, the PJM Reliability Assurance   | ¶ 61,250, at P 45 (2009). That order directed   |

| Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Source | Current Language  | Proposed Revisions   | Rationale/Notes  |
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|   |        | Assurance Agreement Among Load Serving Entities in the PJM<br>Region and the PJM Manuals. Capacity compliance will be based on<br>each individual customers' load reductions, or a current statistical<br>sample of end-use customers' load reductions, and then aggregated<br>pursuant to section 3.3A of Schedule 1 of this Agreement, the PJM<br>Reliability Assurance Agreement Among Load Serving Entities in<br>the PJM Region and the PJM Manuals; and<br>v. Each End-Use Customer site must meet the requirements<br>for market participation by a Demand Resource. | Agreement Among Load Serving Entities in the PJM Region and the<br>PJM Manuals. Capacity compliance will be based on each individual<br>customers' load reductions, or a current statistical sample of end-use<br>customers' load reductions, and then aggregated pursuant to section<br>3.3A of Schedule 1 of this Agreement, the PJM Reliability Assurance<br>Agreement Among Load Serving Entities in the PJM Region and the<br>PJM Manuals; and<br>v. Each Eend-Uuse Ccustomer site must meet the requirements<br>for market participation by a Demand Resource. | PJM to modify the Tariff and OA to reflect<br>the aggregation rules for demand response<br>resources and to make conforming changes to<br>aggregation rules in PJM Manuals.<br>Accordingly, the stated purpose of this<br>revision was to have "[i]ncorporated the<br>aggregation rules, as directed." <i>See PJM</i><br><i>Interconnection, L.L.C.</i> , Transmittal Letter,<br>Docket No. ER19-1063-003, Attachment C,<br>at 1 (March 18, 2010).<br>Moreover, throughout PJM's governing<br>documents, the defined term "End-Use<br>Customer" is applicable only in one context,<br>which is exclusively focused on establishing<br>the qualifications for a PJM Member to be an<br>End-Use Customer. The RAA defines an<br>"End-Use Customer" as "a Member that is a<br>retail end-user of electricity within the PJM<br>Region." The definition then goes on to detail<br>that "[f]or purposes of Members Committee<br>sector classification, a Member that is a retail<br>end-use rule of Member that is a retail<br>end-use customer if" certain conditions are<br>met. Finally, the definition concludes that<br>"[t]he foregoing notwithstanding, taking retail<br>service may not be sufficient to qualify as<br>an End-Use Customer if" certain conditions are<br>met. Finally, the definition of an End-Use<br>Customer is not pertinent to the Economic<br>Load Response Participants; rather, its<br>primary purpose relates to PJM's governance. |

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|   |        | For Economic Load Response Participants that choose to measure<br>demand reductions using an end-use customer's Customer Baseline<br>Load ("CBL"), the CBL shall be determined using the following<br>formula for such participant's Non-Variable Loads. Additionally, the<br>following formula shall be used to determine a Peak Shaving<br>Adjustment End-Use Customer's demand reductions when<br>determining peak shaving performance rating as described in PJM<br>Manual 19WEB, unless an alternative CBL is approved pursuant to<br>section 3.3A.2.01 of this schedule: | For Economic Load Response Participants that choose to measure<br>demand reductions using an end-use customer's Customer Baseline<br>Load ("CBL"), the CBL shall be determined using the following<br>formula for such participant's Non-Variable Loads. Additionally, the<br>following formula shall be used to determine a Peak Shaving<br>Adjustment Eend-Uuse Ccustomer's demand reductions when<br>determining peak shaving performance rating as described in PJM<br>Manual 19WEB, unless an alternative CBL is approved pursuant to<br>section 3.3A.2.01 of this schedule: | Corrections made for scrivener's error<br>resulting in inadvertent capitalizations of the<br>term "end-use customer" from revisions<br>proposed in PJM's December 7, 2018 filing<br>in Docket No. ER19-511-000 intended to<br>specify that the metric for measuring the<br>actual performance of a peak shaving<br>program will be Customer Baseline Load,<br>which is the same performance measurement<br>used for Economic Load Response<br>Participants.<br>The transmittal included no mention of<br>restricting the meaning of "end-use<br>customer" in this provision to include only<br>PJM Members.<br>PJM has implemented this section consistent<br>with stakeholder intent and industry<br>understanding, which is not to limit peak<br>shavings adjustments to only those end-use<br>customers who are also PJM Members, for<br>over 5 years.<br>Limiting this section's applications to only<br>allow peak shavings adjustments for end-use<br>customers that are also PJM members would<br>cause significant market disruption and<br>unsettle long-standing expectations of PJM's<br>peak shavings adjustments programs.<br>Moreover, throughout PJM's governing<br>documents, the defined term "End-Use<br>Customer" is applicable only in one context,<br>which is exclusively focused on establishing |

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|   |              |  |                    | the qualifications for a PJM Member to be an<br>End-Use Customer. The RAA defines an<br>"End-Use Customer" as "a Member that is a<br>retail end-user of electricity within the PJM<br>Region." The definition then goes on to detail<br>that "[f]or purposes of Members Committee<br>sector classification, a Member that is a retail<br>end-user that owns generation may qualify as<br>an End-Use customer if" certain conditions are<br>met. Finally, the definition concludes that<br>"[t]he foregoing notwithstanding, taking retail<br>service may not be sufficient to qualify a<br>Member as an End-Use Customer." As<br>detailed above, this definition of an End-Use<br>Customer is not pertinent to the Peak Shaving<br>Adjustment; rather, its primary purpose relates<br>to PJM's governance. |
| 34. Tariff, Attachment D<br>K-Appendix, section<br>3.3A.8(a)<br>&<br>Operating<br>Agreement,<br>Schedule 1, section<br>3.3A.8(a), Economic<br>Load Response<br>Participant Review<br>Process. | aniel Vinnik | determined for purposes of assessing balancing operating reserves<br>charges). PJM will notify the Participant when their registration is<br>under review. While the Participant's registration is under review by<br>PJM, the Participant may continue economic load reductions but all<br>settlements will be denied by PJM until the registration review is<br>resolved pursuant to subsection (i) or (ii) below. PJM will require<br>the Participant to provide information within 30 days to support that<br>the settlements were submitted for load reduction activity done in<br>response to price and not submitted based on the End-Use<br>Customer's normal operations.<br>v. The electric distribution company may only deny<br>settlements during the normal settlement review process for |                    | resulting in inadvertent capitalizations of the<br>term "end-use customer" from prior to 2010.<br>PJM has implemented this section consistent<br>with stakeholder intent and industry<br>understanding, which is not to limit<br>aggregation of end-use customers to only<br>PJM Members, for over 14 years.   |

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|   |        |                  |                    | These revisions were first included in a<br>March 18, 2010 filing in Docket No. ER09-<br>1063-003, responding to a Commission<br>directive from its December 18, 2009 order.<br><i>See PJM Interconnection, L.L.C.</i> , 129 FERC<br>¶ 61,250, at P 92 (2009). That order directed<br>PJM to modify the Tariff and OA to reflect<br>the normal operations review criteria posted<br>on PJM's website at pjm.com/committees-<br>and-groups/closed-<br>groups/~/media/committees-<br>groups/committees/drsc/20081031-item-04-<br>dsr-activity-review-proc.ashx. Accordingly,<br>the stated purpose of this revision was to<br>have "[r]eflected the criteria posted on the<br>website, as directed." <i>See PJM</i><br><i>Interconnection, L.L.C.</i> , Transmittal Letter,<br>Docket No. ER19-1063-003, Attachment C,<br>at 1 (March 18, 2010).<br>Throughout PJM's governing documents, the<br>defined term "End-Use Customer" is<br>applicable only in one context, which is<br>exclusively focused on establishing the<br>qualifications for a PJM Member to be an End-<br>Use Customer. The RAA defines an "End-Use<br>Customer" as "a Member that is a retail end-<br>user of electricity within the PJM Region."<br>The definition then goes on to detail that "[f]or<br>purposes of Members Committee sector<br>classification, a Member that is a retail end-<br>user that owns generation may qualify as an<br>End-Use customer if" certain conditions are<br>met. Finally, the definition concludes that |

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|  |               |  |   | "[t]he foregoing notwithstanding, taking retail<br>service may not be sufficient to qualify a<br>Member as an End-Use Customer." As<br>detailed above, this definition of an End-Use<br>Customer is not pertinent to the Economic<br>Load Response Participants; rather, its<br>primary purpose relates to PJM's governance.  |
| 35. Tariff, Attachment<br>DD-2, section (B),<br>Peak Shaving Plan<br>Details | Daniel Vinnik | following information when the End-Use Customer is known at the<br>time of the submittal of the Peak Shaving Adjustment Plan. This<br>section shall also be completed for peak shaving quantities identified<br>in the Peak Shaving Adjustment plan as requiring site-specific<br>information, since this identified quantity should reflect planned peak<br>shaving associated with specific End-Use Customer sites for which the<br>Peak Shaving Adjustment program administrator has a high degree of<br>certainty that it will physically deliver for the relevant summer period<br>The Peak Shaving Adjustment program administrator shall provide the<br>following information:<br>In the event that Peak Shaving Adjustment program administrators<br>identify the same End-Use Customer site, the MWs associated with<br>such site will not be approved for offering into the RPM auction or<br>inclusion in the peak shaving adjustment by any of the Peak Shaving<br>Adjustment program administrators, unless it can be supported by<br>evidence, such as a letter of support from the End-Use Customer<br>indicating that they have been in contact with the Peak Shaving<br>Adjustment program administrator and are likely to execute a<br>contract with that Peak Shaving Adjustment program administrator<br>for the relevant summer period. In the event that multiple letters of<br>support indicating different Peak Shaving Adjustment program | Peak Shaving Adjustment program administrator shall provide the<br>following information when the Eend-Uuse Ccustomer is known at the<br>stime of the submittal of the Peak Shaving Adjustment Plan. This section<br>shall also be completed for peak shaving quantities identified in the Peak<br>Shaving Adjustment plan as requiring site-specific information, since<br>this identified quantity should reflect planned peak shaving associated<br>with specific Eend-Uuse Ccustomer sites for which the Peak Shaving<br>fAdjustment program administrator has a high degree of certainty that it<br>will physically deliver for the relevant summer period. The Peak Shaving<br>The Peak Shaving Adjustment program administrator shall provide the<br>following information:<br>In the event that Peak Shaving Adjustment program administrators<br>identify the same Eend-Uuse Ccustomer site, the MWs associated with<br>such site will not be approved for offering into the RPM auction or<br>inclusion in the peak shaving adjustment by any of the Peak Shaving<br>Adjustment program administrators, unless it can be supported by<br>evidence, such as a letter of support from the Eend-Uuse Ccustomer<br>indicating that they have been in contact with the Peak Shaving<br>Adjustment program administrator and are likely to execute a contract<br>with that Peak Shaving Adjustment program administrator for the<br>relevant summer period. In the event that multiple letters of support<br>indicating different Peak Shaving Adjustment program administrators<br>are provided from the end use customer, the MWs associated with the | resulting in inadvertent capitalizations of the<br>term "end-use customer" from revisions<br>proposed in PJM's<br>The compliance filing in Docket No. ER19-<br>511-002 resulting from the Commission's<br>May 3, 2019 order directing PJM to<br>incorporate into the Tariff PJM Manual<br>provisions pertaining to the terms and<br>conditions of Peak Shaving Adjustment,<br>consisting of PJM Manual 19, Attachment D:<br>Peak Shaving Adjustment Plan and<br>Performance Rating, Section 2: Peak Shaving |

| Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Source | Current Language   | Proposed Revisions  | Rationale/Notes  |
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|   |        | inclusion in the load forecast by any of the Peak Shaving Adjustment program administrators. | load forecast by any of the Peak Shaving Adjustment program administrators. | customers who are also PJM Members, for<br>over 5 years.<br>The 2018 PJM Manual 19 specifically stated<br>that the Peak Shaving program administrator<br>must identify planned peak shaving by the<br>"end-use customer segment" and notes that<br>such segments "include residential,<br>commercial, small industrial (less than 3<br>MW), medium industrial (between 3 MW<br>and 10 MW) and large industrial (greater<br>than 10 MW)." 2018 PJM Manual 19 at 46.<br>The 2018 PJM Manual 19's use of the term<br>in accordance with its common meaning<br>supports that when PJM migrated the Peak<br>Shaving Adjustment procedures to its Tariff,<br>capitalization of the term end-use customer<br>was inadvertent and not purposeful; i.e. PJM<br>did not intend to limit the Peak Shaving<br>Adjustment to certain PJM Members. This<br>contention is further supported by PJM's<br>transmittal letter for that migration, which<br>refers to the lowercase "end-use customer"<br>when describing the Peak Shaving<br>Adjustment details. <i>See PJM Interconnection,</i><br><i>L.L.C.</i> , Compliance Filing Concerning Peak<br>Shaving Adjustment, Docket No. ER19-511-<br>002, at 2 ("Specifically, the new section<br>details the requisite information that are<br>required to be specified in a Peak Shaving<br>Adjustment plan, including the details of the<br>program, historic program impacts, and<br>timelines for procuring end-use customer<br>sites."). |

|     | Governing<br>Document,<br>Agreement,<br>Attachment,                       | Source        | Current Language  | Proposed Revisions  | Rationale/Notes   |
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|     | Section, Title  |               |   |   | Limiting this section's applications to only<br>allow peak shavings adjustments for end-use<br>customers that are also PJM members would<br>cause significant market disruption and<br>unsettle long-standing expectations of PJM's<br>peak shavings adjustments programs.  |
|     |   |               |   |   | Moreover, throughout PJM's governing<br>documents, the defined term "End-Use<br>Customer" is applicable only in one context,<br>which is exclusively focused on establishing<br>the qualifications for a PJM Member to be an<br>End-Use Customer. The RAA defines an<br>"End-Use Customer" as "a Member that is a<br>retail end-user of electricity within the PJM<br>Region." The definition then goes on to detail<br>that "[f]or purposes of Members Committee<br>sector classification, a Member that is a retail<br>end-user that owns generation may qualify as<br>an End-Use customer if" certain conditions are |
|     |   |               |   |   | met. Finally, the definition concludes that<br>"[t]he foregoing notwithstanding, taking retail<br>service may not be sufficient to qualify a<br>Member as an End-Use Customer." As<br>detailed above, this definition of an End-Use<br>Customer is not pertinent to the Peak Shaving<br>Adjustment; rather, its primary purpose relates<br>to PJM's governance.   |
| 36. | Tariff, Attachment<br>DD-2, section (B) –<br>Peak Shaving Plan<br>Details | Daniel Vinnik | planned peak shaving values for which an End-Use Customer site is<br>not identified in this section B(2) of the Peak Shaving Adjustment plan<br>details, the Peak Shaving Adjustment program administrator shall<br>identify the planned peak shaving values by Zone and by End-Use | (3) Planned Peak Shaving Value by Customer Segment. For those planned peak shaving values for which an Eend-Uuse Ccustomer site is not identified in this section B(2) of the Peak Shaving Adjustment plan details, the Peak Shaving Adjustment program administrator shal identify the planned peak shaving values by Zone and by Eend-Uuse Ccustomer segment. Eend-Uuse Ccustomer segments included | sresulting in inadvertent capitalizations of the<br>term "end-use customer" from revisions<br>lproposed in PJM's  |

| Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Source | Current Language   | Proposed Revisions   | <b>Rationale/Notes</b>   |
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|   |        | <ul> <li>(between 3 MW and 10 MW) and large industrial (greater than 10 MW). If known, the Peak Shaving Adjustment program administrator may identify more specific customer segments within the commercial and industrial category. The Peak Shaving Adjustment program administrator shall provide estimates of the following information by Zone and by End-Use Customer segment: <ul> <li>(a)Number of End-Use Customer to be registered for each summer period;</li> <li>(b)Average Peak Load Contribution (PLC) per End-Use Customer in kW; and</li> <li>(c)Average peak shaving value per customer in kW.</li> </ul> </li> <li>Based on the above provided information, a total peak shaving value in MW will be calculated for each End-Use Customer segment and for each Zone. The total peak shaving value identified by customer segment and aggregated for each Zone of the Peak</li> <li>Shaving Plan details plus the total peak shaving values identified by End-Use Customer site(s) and aggregated for each Zone of the Peak</li> </ul> | <ul> <li>summer period;</li> <li>(b)Average Peak Load Contribution (PLC) per Eend-Uuse Coustomer in kW; and</li> <li>(c)Average peak shaving value per customer in kW.</li> <li>Based on the above provided information, a total peak shaving value in MW will be calculated for each Eend-Uuse Coustomer segment and for each Zone. The total peak shaving value identified by customer segment and aggregated for each Zone of the Peak Shaving Plan details plus the total peak shaving values identified by Eend-Uuse Coustomer (s) and aggregated for each Zone of the Peak Shaving Plan details shall equal the total peak shaving value for each Zone as identified in the Peak Shaving Adjustment plan.</li> </ul> | <ul> <li>511-002 resulting from the Commission's May 3, 2019 order directing PJM to incorporate into the Tariff PJM Manual provisions pertaining to the terms and conditions of Peak Shaving Adjustment, consisting of PJM Manual 19, Attachment D: Peak Shaving Adjustment Plan and Performance Rating, Section 2: Peak Shaving Adjustment Plan Template, Sections A through E.</li> <li>The compliance filing included no mention of restricting the meaning of "end-use customer" in this provision to include only PJM Members.</li> <li>PJM has implemented this section consistent with stakeholder intent and industry</li> </ul> |

|     | Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Source        | Current Language   | Proposed Revisions  | Rationale/Notes   |
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| 37. |   | Daniel Vinnik | administrator shall provide an approximate timeline for procuring<br>End-Use Customer sites in order to physically deliver the total peak<br>shaving value (existing and planned peak shaving) by Zone in the<br>Peak Shaving Adjustment plan. For each Zone and for each customer | <ul> <li>E. Schedule. The Peak Shaving Adjustment program<br/>administrator shall provide an approximate timeline for procuring<br/>Eend-Uuse Ccustomer sites in order to physically deliver the total peak<br/>shaving value (existing and planned peak shaving) by Zone in the Peak<br/>Shaving Adjustment plan. For each Zone and for each customer</li> </ul>               | proposed in PJM's   |
|     |   |               | specify the cumulative number of customers and the cumulative peak<br>shaving value associated with that group of customers that the Peak<br>Shaving Adjustment program administrator expects to have under<br>contract by the beginning of each of the summer periods in the PJM  | segment, the Peak Shaving Adjustment program administrator shall<br>specify the cumulative number of customers and the cumulative peak<br>shaving value associated with that group of customers that the Peak<br>Shaving Adjustment program administrator expects to have under<br>contract by the beginning of each of the summer periods in the PJM<br>load forecast horizon. | The compliance filing in Docket No. ER19-<br>511-002 resulting from the Commission's<br>May 3, 2019 order directing PJM to<br>incorporate into the Tariff PJM Manual<br>provisions pertaining to the terms and<br>conditions of Peak Shaving Adjustment,<br>consisting of PJM Manual 19, Attachment D:<br>Peak Shaving Adjustment Plan and<br>Performance Rating, Section 2: Peak Shaving<br>Adjustment Plan Template, Sections A<br>through E. |

| Governing<br>Document,<br>Agreement, | Source | Current Language | Proposed Revisions | Rationale/Notes   |
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| Attachment,<br>Section, Title        |        |                  |                    |   |
| Section, The                         |        |                  |                    | The compliance filing included no mention of<br>restricting the meaning of "end-use<br>customer" in this provision to include only<br>PJM Members.  |
|                                      |        |                  |                    | PJM has implemented this section consistent<br>with stakeholder intent and industry<br>understanding, which is not to limit peak<br>shavings adjustments to only those end-use<br>customers who are also PJM Members, for<br>over 5 years.  |
|                                      |        |                  |                    | Limiting this section's applications to only<br>allow peak shavings adjustments for end-use<br>customers that are also PJM members would<br>cause significant market disruption and<br>unsettle long-standing expectations of PJM's<br>peak shaving adjustments programs.   |
|                                      |        |                  |                    | Moreover, throughout PJM's governing<br>documents, the defined term "End-Use<br>Customer" is applicable only in one context,<br>which is exclusively focused on establishing<br>the qualifications for a PJM Member to be an<br>End-Use Customer. The RAA defines an<br>"End-Use Customer" as "a Member that is a<br>retail end-user of electricity within the PJM                                |
|                                      |        |                  |                    | Region." The definition then goes on to detail<br>that "[f]or purposes of Members Committee<br>sector classification, a Member that is a retail<br>end-user that owns generation may qualify as<br>an End-Use customer if" certain conditions are<br>met. Finally, the definition concludes that<br>"[t]he foregoing notwithstanding, taking retail<br>service may not be sufficient to qualify a |

| Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Source        | Current Language   | Proposed Revisions  | Rationale/Notes   |
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|   |               |  |   | Member as an End-Use Customer." As<br>detailed above, this definition of an End-Use<br>Customer is not pertinent to the Peak Shaving<br>Adjustment; rather, its primary purpose relates<br>to PJM's governance. |
| 38. Reliability<br>Assurance<br>Agreement, Article<br>1, Definitions  | Daniel Vinnik | "Peak Shaving Adjustment" shall mean a load forecast mechanism<br>that allows load reductions by end-use customers to result in a<br>downward adjustment of the summer load forecast for the associated<br>Zone. Any End-Use Customer identified in an approved peak<br>shaving plan shall not also participate in PJM Markets as Price<br>Responsive Demand, Demand Resource, Base Capacity Demand<br>Resource, Capacity Performance Demand Resource, or Economic | "Peak Shaving Adjustment" shall mean a load forecast mechanism that<br>allows load reductions by end-use customers to result in a downward<br>adjustment of the summer load forecast for the associated Zone. Any<br>Eend-Uuse Ccustomer identified in an approved peak shaving plan<br>shall not also participate in PJM Markets as Price Responsive Demand,<br>Demand Resource, Base Capacity Demand Resource, Capacity<br>Performance Demand Resource, or Economic Load Response<br>Participant. | proposed in PJM's December 7, 2018 filing<br>in Docket No. ER19-511-000 intended to<br>alter the specific definition of Peak Shaving  |

| Governing<br>Document,<br>Agreement,<br>Attachment,<br>Section, Title | Source | Current Language | Proposed Revisions | Rationale/Notes  |
|---|--------|------------------|--------------------|--|
|   |        |                  |                    | Limiting this section's applications to only<br>allow peak shavings adjustments for end-use<br>customers that are also PJM members would<br>cause significant market disruption and<br>unsettle long-standing expectations of PJM's<br>peak shavings adjustments programs.<br>Moreover, throughout PJM's governing<br>documents, the defined term "End-Use<br>Customer" is applicable only in one context,<br>which is exclusively focused on establishing<br>the qualifications for a PJM Member to be an<br>End-Use Customer. The RAA defines an<br>"End-Use Customer" as "a Member that is a<br>retail end-user of electricity within the PJM<br>Region." The definition then goes on to detail<br>that "[f]or purposes of Members Committee<br>sector classification, a Member that is a retail<br>end-user that owns generation may qualify as<br>an End-Use customer if" certain conditions are<br>met. Finally, the definition concludes that<br>"[t]he foregoing notwithstanding, taking retail<br>service may not be sufficient to qualify a<br>Member as an End-Use Customer." As<br>detailed above, this definition of an End-Use<br>Customer is not pertinent to the Peak Shaving<br>Adjustment; rather, its primary purpose relates<br>to PJM's governance. |