Н	Governing Document, Agreement, Attachment, Section, Title	Current Language	Proposed Revisions	Rationale/Notes
	Tariff, Att. DD, Section 5.5A (d) (ii)	ii) Winter-Period Capacity Performance Resource  For the 2020/2021 Delivery Year and subsequent Delivery Years, the following types of Capacity Resources are eligible to submit a Sell Offer as a Winter-Period Capacity Performance Resource: Capacity Storage Resource, Intermittent Resource, and Environmentally-Limited Resource that has an average expected energy output during winter peak-hour periods consistently and measurably greater than its average expected energy output during summer peak-hour periods. To the extent such resource clears an RPM Auction or is otherwise committed as a Winter-Period Capacity Performance Resource, it is obligated to deliver energy as scheduled and/or dispatched by the Office of Interconnection during Performance Assessment Intervals occurring in the calendar months of November through April of the Delivery Year, and must satisfy the requirements of a Capacity Performance Resource for such period of time. As further detailed in Tariff, Attachment DD, section 10A, Winter-Period Capacity Performance Resources that fail to meet this obligation will be subject to a Non-Performance Charge, unless excused pursuant to Tariff, Attachment DD, section 10A(d).	For the 2020/2021 Delivery Year and subsequent Delivery Years, tThe following types of Capacity Resources are eligible to submit a Sell Offer as a Winter-Period Capacity Performance Resource: Capacity Storage Resource, Intermittent Resource that has been granted additional Capacity Interconnection Rights related to the winter-period.and Environmentally-Limited Resource that has an average expected energy output during winter peak hour periods consistently and measurably greater than its average expected energy output during summer peak hour periods. To the extent such resource clears an RPM Auction or is otherwise committed as a Winter-Period Capacity Performance Resource, it is obligated to deliver energy as scheduled and/or dispatched by the Office of Interconnection during Performance Assessment Intervals occurring in the calendar months of November through April of the Delivery Year, and must satisfy the requirements of a Capacity Performance Resource for such period of time. As further detailed in Tariff, Attachment DD, section 10A, Winter-Period Capacity Performance Resources that fail to meet this obligation will be subject to a Non-Performance Charge, unless excused pursuant to Tariff, Attachment DD, section 10A(d).	

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2	Title Tariff, Attachment N-4 (2.0) (b)	b. The DER Aggregator has met all requisite qualification and eligibility criteria for receiving DER Aggregator Participation Service from PJM, shall comply with all operational and safety directives of PJM, and shall comply with all applicable provisions of the PJM Tariff, Attachment K-Appendix, Operating Agreement, Schedule 1, and the PJM Manuals. The DER Aggregator attests that it is currently, and will remain, in full compliance with the tariffs, agreements, and operating procedures of the applicable electric distribution company, and the rules and regulations of any Relevant Electric Retail Regulatory Authority,	b. The DER Aggregator has met all requisite qualification and eligibility criteria for receiving DER Aggregator Participation Service from PJM, shall comply with all operational and safety directives of PJM, and shall comply with all applicable provisions of the PJM Tariff, Attachment K-Appendix, Operating Agreement, Schedule 1, and the PJM Manuals. The DER Aggregator attests that it is currently, and will remain, in full compliance with the tariffs, agreements, and operating procedures of the applicable Eelectric Ddistribution Ceompany, and the rules and regulations of any Relevant Electric Retail Regulatory Authority,	"Electric Distribution Company" is a defined terms in the Tariff. As such, it needs to be capitalized.  "Electric Distribution Company" will be a defined term in the Tariff, effective February 1, 2028, pursuant to FERC's acceptance of PJM's compliance filing in Docket No. ER22-962-008. As such, it needs to be capitalized, effective February 1, 2028.
3	Tariff, Attachment Q (VI) (B) (3) (a)	during the term of this DAPSA.  (a) For Planned Demand Resources and Energy Efficiency Resources, the RPM Auction Credit requirement will be reduced in direct proportion to the megawatts of such Demand Resource that the Resource Provider qualifies as a Capacity Resource, in accordance with the procedures established under the Reliability Assurance Agreement.	during the term of this DAPSA.  (a) For Planned Demand Resources, Planned DER  Capacity Aggregation Resources and Energy Efficiency	PJM erroneously did not include language regarding ability of a Planned DER Capacity Aggregation Resource to reduce its credit requirement. <i>See also</i> RAA, Article 1, Definitions "Planned DER Capacity Aggregation Resource".
4	Tariff, Article 1, Definitions R-S and parallel provisions in OA, Article 1, Definitions S-T	"State Estimator" shall mean the computer model of power flows specified in Operating Agreement, Schedule 1, section 2.3, and the parallel provisions of Tariff, Attachment K-Appendix, section 2.3.	"State Estimator" shall mean the computer model of power flows specified in Operating Agreement, Schedule 1, section 1.11A2.3, and the parallel provisions of Tariff, Attachment K-Appendix, section 1.11A2.3.	

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5	Tariff, Attachment DD, section 11B	such Zone for the DER Capacity Aggregation Resource that tested plus the greater of (0.20 times the Weighted Daily Revenue Rate in such Zone for the product(s) tested or \$20/MW-day). Such charge shall be assessed daily and charged monthly (or otherwise in accordance with customary PJM billing practices in effect at the time); provided, however, that a lump sum payment may be required to reflect amounts due, as a result of a test failure, from the start of the Delivery Year to the day that charges are reflected in regular billing.	Revenue Rate in such Zone for the product(s) tested or \$20/MW-day); provided, however, if a resource is unavailable during the Delivery Year at less than the level committed in the Market Seller's cleared Sell Offer or Locational UCAP Seller's Location UCAP sale, then such seller shall not be assessed a charge under this section to the extent (i.e., for the same megawatts and time period) that such seller is assessed a Capacity Resource deficiency charge pursuant to Tariff, Attachment DD, section 8 for such unavailability; and provided, however, further that a resource that is subject to a charge under this section that is also subject to a charge under Tariff, Attachment DD, section 10A hereof for a Performance Shortfall during one or more Performance Assessment Intervals occurring during the period of resource deficiency testing shortfall addressed by this section shall be assessed a charge equal to the greater of the charge determined under this section and the charge determined under Tariff, Attachment DD, section 10A, but shall not be assessed a charge under both this section and Tariff, Attachment DD,	penalized for both (1) Capacity Resource Deficiency Charges and Test Failure Charges and (2) Non-Performance Charges and Test Failure Charges. Instead, a resource would simply not be charged Test Failure Charges if charged Capacity Resource Deficiency Charges for same megawatts and time period and would be charged the higher of the twoTest Failure Charges or Non-Performance Charges, consistent with the approach for all committed Capacity Resources. As this section becomes effective February 1, 2028, pursuant to FERC's acceptance of PJM's compliance filing in Docket No. ER22-962-008, this proposed clarification would also become effective February 1, 2028.

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			failure, from the start of the Delivery Year to the day that charges are reflected in regular billing.	
	Tariff, Schedule 6A(6)(i)	6. (i) Owners of Black Start Units selected to provide Black Start Service prior to June 6, 2021, in accordance with section 4 of this Schedule 6A and electing to recover new or additional Black Start Capital Costs shall commit to provide Black Start Service from such Black Start Units for a term based upon the age of the Black Start Unit or the longest expected life of the Incremental Black Start Capital Cost, as set forth in the applicable CRF Table in section 18 of this Schedule 6A.	6. (i) Owners of Black Start Units selected to provide Black Start Servicemaking capital investment prior to June 6, 2021, in order to provide or continue to provide Black Start Service in accordance with section 4 of this Schedule 6A and electing to recover new or additional Black Start Capital Costs shall commit to provide Black Start Service from such Black Start Units for a term based upon the age of the Black Start Unit or the longest expected life of the Incremental Black Start Capital Cost, as set forth in the applicable CRF Table in section 18 of this Schedule 6A.	The proposed language aligns with PJM's intent and provides clarification related to capital investments for Black Start units. This clarification will align the time period of the capital investment to the currently effective CRF.  The proposed GDECS changes align with FERC's Order in Docket No. ER21-1635-001 and EL21-91-000, deciding that the CRF should align with when the capital investment was made and not when the unit was originally selected for Black Start.
	7 Tariff, Schedule 6A(6)(ii)	(ii) Owners of Black Start Units selected to provide Black Start Service after June 6, 2021, in accordance with Schedule 6A, section 4 and electing to recover new or additional Black Start Capital Costs shall commit to provide Black Start Service from such Black Start Units for an initial capital recovery period based upon the age of the Black Start Unit plus the remaining life of the Black Start equipment.	(ii) Owners of Black Start Units selectedmaking capital investment after June 6, 2021, in order to provide Black Start Service after June 6, 2021, in accordance with Schedule 6A, section 4 and electing to recover new or additional Black Start Capital Costs shall commit to provide Black Start Service from such Black Start Units for an initial capital recovery period based upon the age of the Black Start Unit plus the remaining life of the Black Start equipment.	The proposed language aligns with PJM's intent and provides clarification related to capital investments for Black Start units. This clarification will align the time period of the capital investment to the currently effective CRF.  The proposed GDECS changes align with FERC's Order in Docket No. ER21-1635-001 and EL21-91-000, deciding that the CRF should align with when the capital

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				investment was made and not when the unit was originally selected for Black Start.
	Schedule 6A(18)	Units selected for Black Start Service prior to June 6, 2021, shall continue to be determined in accordance with the following table:  The CRF applicable to Black Start Capital Costs and/or for Fuel Assurance Capital Costs, of Black Start Units selected for Black Start Service after June 6, 2021, shall be updated annually on March 1 (if March 1 is not a Business day then the first Business Day after March 1) for (i) federal income tax rates as utilized by the U.S. Internal Revenue Service in effect at the time of the annual CRF update; (ii) average state tax rate; and (iii) debt interest rates and shall be posted on the PJM website by March 31 each year as shown in the table below.	prior to June 6, 2021 in order to provide or continue to provide Black Start Service, shall continue to be determined in accordance with the following table:  The CRF applicable to Black Start Capital Costs and/or for Fuel Assurance Capital Costs, of Black Start Units making capital investment after June 6, 2021 to provide or continue to provide selected for Black Start Service after June 6, 2021, shall be updated annually on March 1 (if March 1 is not a Business day then the first Business Day after March 1) for (i) federal income tax rates as utilized by the U.S. Internal Revenue Service in effect at the time of the annual CRF update; (ii) average state tax rate; and (iii) debt interest rates and shall be posted on the PJM website by March 31 each year as shown in the table below.	
9	Attachment K-Appendix, section 1.4B	(d) Projected PJM Market Revenues for DER Capacity Aggregation Resources subject to the Minimum Floor Offer Price or Market Seller Offer Cap shall be determined in accordance with Tariff, Attachment DD, section 6.8(d-1). The determination of PJM Market Revenues by the Market Monitoring Unit or the Office of the Interconnection shall utilize either the hourly output profiles, or the Projected EAS Dispatch, as appropriate.	Aggregation Resources subject to the Minimum Floor Offer Price or Market Seller Offer Cap shall be determined in accordance with Tariff, Attachment DD, section 6.8(d-1). The determination of PJM Market Revenues by the Market Monitoring Unit or the	eTariff, Attachment DD, section 6.8(d-1), which is no longer effective, to the currently effective methodology for ecalculating energy and ancillary service trevenues specified in Tariff, Attachment DD, section 6.8(d). The removal of the last
	Operating Agreement,			sentence is also consistent with updating the language to reflect the currently

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	Schedule 1, section 1.4B			effective methodology for calculating energy and ancillary service revenues.
	8.1 G (1)	Capacity Plan for a Delivery Year shall be subject during such Delivery Year to the charges set forth in Tariff, Attachment DD, section 7, Tariff, Attachment DD, section 7A, Tariff, Attachment DD, section 10A, Tariff, Attachment DD, section 11A, and Tariff, Attachment DD, section 13; provided, however: (i) the Daily Deficiency Rate under Tariff, Attachment DD, section 7, Tariff, Attachment DD, section 7A, Tariff, Attachment DD, section 11A, and Tariff, Attachment DD, section 13 shall be 1.20 times the Capacity Resource Clearing Price resulting from all RPM Auctions for such Delivery Year for the LDA encompassing the Zone of the FRR Entity, weight-averaged for	Delivery Year to the charges set forth in Tariff, Attachment DD, tsection 7, Tariff, Attachment DD, section 7A, Tariff, Attachment DD, section 10A, Tariff, Attachment DD, section 11A, Tariff, Attachment DD, section 11B, and Tariff, Attachment DD, section 13; provided, however: (i) the Daily Deficiency Rate under Tariff, Attachment DD, section 7, Tariff, Attachment DD, section 7A, Tariff, Attachment DD, section 11A, and Tariff, Attachment DD, section 13, and the Daily Revenue Rate under Tariff, Attachment DD, section 11B shall be 1.20 times the Capacity Resource Clearing Price resulting from all RPM Auctions for such Delivery Year for the LDA encompassing the Zone of the FRR Entity, weight-averaged for the Delivery	test failure charge rate that is applicable to a DER Capacity Aggregation Resource committed in an FRR Plan and provides the applicable FRR Entity with the same opportunities that a Capacity Market Seller has to cure deficiencies for DER Capacity Aggregation Resource committed through the RPM Auctions. As section Tariff, Attachment DD, section 11B becomes effective February 1, 2028, pursuant to FERC's acceptance of PJM's compliance filing in Docket No. ER22-962-008, this proposed clarification would also become effective February 1, 2028.

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			Delivery Year by procuring replacement Unforced Capacity outside of any RPM Auction and committing such capacity in its FRR Capacity Plan.	