

Sending a Copy of Initial FERC Filings to PJM

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Educational Workshop about Service on PJM

Action Required	Deadline	Who May Be Affected
Educational – no action required	09/14/2022	All Members
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Problem

PJM is responsible for the administration of the RTO Governing Documents, but has experienced times when a initial filing is made by a Member has been not provided to PJM (or its IMM) that directly impacts the administration of the Governing Documents.

While FERC has rules regarding who should receive a copy of certain initial filings, currently there are not clear rules with respect to other filings of concern to PJM and its Members that directly affect or pertain to the Governing Documents.



FERC Rules for Sending Copies of Certain Filings to PJM

FERC Rules Require Sending a Copy of Certain Filings to PJM:

Section 205 Service Agreements, Rates Schedules and Tariff Revisions – 18 C.F.R. §§ 35.2(e) (PJM as "Purchaser") and 385.2010(f)(3)

Section 206 Complaints (against PJM) – 18 C.F.R. §§ 385.206(c), 385.218(c) and 385.2010(b)(1)

Protests - 18 C.F.R. § 211



Important Initial FERC Filings for PJM and its Members

Initial FERC Filings of Interest to PJM and its Members

- A. Section 205 Filings (e.g. Reactive Rate Filings, IMM not copied);
- B. Section 206 Complaints (IMM not copied);
- C. Petitions for Declaratory Orders;
- D. Requests for Waiver of PJM's Tariff Requirements;
- E. Section 203 Transactions; and
- F. Applications for Market-Based Rate Authority and related filings and reports (e.g. Notices of Succession).



Contemplated Solution to This Problem

A requirement mandating that PJM and the IMM receive copies of such initial filings to ensure that PJM is able to timely intervene and participate in such proceedings to protect the interests of PJM and its Members.

There is an opportunity to add requirements to provide PJM with a copy of such initial filings in PJM's Governing Documents and/or Manuals. PJM has already adopted a rule for FPA section 203 filing.

PJM proposes to assign a MRC Senior Task Force.



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