vary per request. The information listed below is intended to provide more insight as to how Dynamic Transfer requests are processed.

**Submitting Requests**

All requests must be complete before it will be moved forward in the process. The request form can be found at the following link: Dynamic Transfer Form. PJM may request any additional information essential to properly process the request. PJM will inform submitter once PJM considers the request to be complete. Please note, PJM will not consider a request complete until the submitter has formally notified the Native Balancing Authority of the request to Pseudo-Tie and provide PJM with evidence of such notification. Additionally, a request should not be made until the resource exists in the Native Balancing Authority's planning queue.

**Administrative Fee**

Once a Pseudo-Tie request is considered complete by PJM, the submitter will be required to execute a System Modification Cost Reimbursement Agreement. Additionally, with the execution of the Agreement, the submitter must provide PJM with the Administration Fee as described before the process can move forward.

**Pseudo-Tie Approval Process**

All generator Pseudo-Tie requests, once the Administrative Fee is received by PJM, must go through the Pseudo-Tie Approval Process. The process consists of planning, modeling and markets eligibility tests and criteria. As each criterion is studied, PJM will inform the submitter of the results. All eligibility requirements must be met in order for the request to be approved. Each criterion is described in detail below.

**Planning Eligibility Criteria**

PJM has established a process in which the study of the generation seeking to pseudo-tie to PJM requires the review of the transmission planning studies, for that portion of the study conducted outside of the PJM footprint, as well as providing assistance to the entity seeking to pseudo-tie that generation in the event that the transmission planning studies are not approved as sufficient. The review of these studies conducted outside of PJM’s footprint, by PJM, will allow PJM to determine if the studies performed will meet, are similar to, or exceed the requirements associated with the studies of generation seeking to connect to the PJM footprint. The requirement to review these studies conducted outside of the PJM footprint allows PJM to determine if that generation seeking to pseudo-tie to PJM is similar in its deliverability, when comparing to the generation directly connected to the PJM footprint, as it relates to the criteria used to test the system and the extent to which the system is reinforced for the deliverability of that generation and the system surrounding that generation. The initial study of generation inside the PJM footprint is conducted under procedures as outlined in PJM Manual 14A, under the feasibility and system impact study requirements of sections 2.1.6 and 2.2.2, as well as the general study procedures as outlined in Section C.7 of Attachment C, and Attachment G of PJM Manual 14B. Ongoing study requirements for the study of generation in the PJM footprint must be maintained under these same standards as is conducted in the annual RTEP studies.

Any entity seeking to pseudo-tie a generation resource to PJM may consult with PJM to review the criteria to be utilized in the transmission planning studies which may be performed, by entities outside of PJM during the conduct of required transmission service studies, in order to allow PJM to provide comment as to the potential need for additional study beyond those transmission service studies. In order to allow PJM to conduct this evaluation, the entity seeking
to pseudo-tie to PJM shall provide to PJM the criteria requirements used to both study the 
individual generation to be pseudo-tied to as well as provide the criteria which shall be used 
on an on-going basis to study the system surrounding that generation. This will allow PJM 
to evaluate both the current process for study as well as that process which may be used to 
continue to ensure the system is reinforced appropriately.

Alternately, if the transmission service studies have already been completed, the entity seeking 
to pseudo-tie to PJM may provide the study reports which documented the studies performed to 
grant the transmission service on those systems outside of PJM. PJM will review these studies 
to determine if other studies are required in order to allow certification of that initial study. This 
review will ensure that the study used criteria meets, is similar to, or exceeds the requirements 
associated with the studies of generation seeking to connect to the PJM footprint. The entity 
seeking to pseudo-tie to PJM must also provide the criteria which shall be used on an on-going 
basis to study the system surrounding that generation.

If the studies conducted, or that will be conducted, to allow the external Balancing Authority to 
grant transmission service to the entity seeking to pseudo-tie to PJM, as well as the studies 
conducted which will examine the system surrounding the generation on an on-going basis, 
meet the PJM transmission planning criteria requirements, then no additional work will be 
required to meet the transmission planning requirements associated with the process to 
pseudo-tie generation to PJM. If the studies which were conducted, or that will be conducted, do 
not meet the PJM criteria requirements, the entity seeking to pseudo-tie generation to PJM will 
be required to engage a consultant to perform studies to ensure that all studies, taken together, 
can be assured as meeting the PJM criteria requirements. PJM will not require performance of 
duplicate studies in the event that additional studies are to be performed by a consultant.

The entity wishing to pseudo-tie to PJM should also understand that, beyond any initial studies 
to verify that the generation is deliverable to PJM under the same criteria as is used to study 
new generation internal to the PJM footprint, the entity seeking to pseudo-tie generation will 
be required to continue to demonstrate, on an on-going basis, that studies performed on the 
system surrounding the generation are conducted in a manner such that the PJM transmission 
planning criteria continues to be used. This will again ensure that the system capabilities are 
being maintained to be consistent with the system capabilities associated with the generation 
directly connected to PJM.

In the event that any study conducted to certify the transmission planning requirements on 
the systems outside of PJM’s footprint identify the need for system reinforcement through 
documentation of a constraint in the study, the entity seeking to pseudo-tie generation to PJM 
must complete upgrades as needed to eliminate any constraints identified in those studies. 
This will require that the entity seeking to pseudo-tie generation to PJM engage the external 
Balancing Authority to complete required upgrades as well as demonstrate to PJM that those 
upgrades are completed.

**Modeling Eligibility Criteria**

In order for a requested Pseudo-Tie to be approved, the particular resource must meet the 
following two modeling criteria: (1) Electrical Distance Test and (2) Seams Coordination Model 
Consistency. Each of the aforementioned criteria is described in detail below

**Electrical Distance Test**
PJM staff will evaluate the feasibility of upgrading the PJM Energy Management System (EMS) 
model to explicitly model the pseudo-tied resource by performing an electrical distance test.