In this section you will find an overview of PJM’s transmission planning process that culminates in the Regional Transmission Expansion Plan (RTEP). This process (referred to in this Manual interchangeably as the RTEP process or more generically as the PJM Region transmission planning process) is one of the primary functions of Regional Transmission Organizations (RTOs.) As such, PJM implements this function in accordance with the Regional Transmission Expansion Planning Protocol set forth in Schedule 6 of the PJM Operating Agreement.

As further described in following portions of this manual, the PJM RTEP process consists of baseline reliability reviews as well as analysis to identify the transmission needs associated with generation interconnection and merchant transmission interconnection. PJM implements the planning of interconnections as part of the broader RTEP process pursuant to the PJM Open Access Transmission Tariff (OATT.) The relationship between Interconnection planning and the RTEP is discussed in later sections of this manual and in related manuals.

1.1 Planning Process Work Flow


This ongoing process has continued to evolve since 1997, when PJM’s RTEPP (codified in PJM’s Operating Agreement, Schedule 6) was approved by the Federal Energy Regulatory Commission (FERC). Since that time, the process has been expanded and enhanced in response to member and regulatory input as documented in the Operating Agreement, Schedule 6, OATT, Attachment M-3 and the PJM Manual 14 series. The current PJM regional transmission expansion plan (RTEP) process includes ample opportunity for stakeholder input through frequent oral and written exchange of information and reviews via the Transmission Expansion Advisory Committee (TEAC) and PJM’s three (3) Subregional RTEP Committees (Mid-Atlantic, Southern and Western).

PJM and PJM Transmission Owners’ planning processes are incorporated in an 18-month overlapping planning cycle which begins in September of the previous calendar year and extends through a full calendar year to the February of the next calendar year. This overlapping planning cycle is illustrated in Exhibit 1 in this Manual.

The PJM planning process activities, culminating in PJM’s annual RTEP, constitute PJM’s single, Order No. 890 compliant, transmission planning process.

All PJM OATT facilities are planned through and included in this open, fully participatory, and transparent process.

There are three (3) planning paths that ultimately culminate in the PJM RTEP base case, also referred to as the planning model. Facilities identified in each path allow for the opportunity for early, full and transparent participation by interested PJM stakeholders. The three paths include planning activities associated with: (i) Baseline Projects, (ii) Supplemental Projects; and (iii) Customer-Funded Upgrades. Baseline Projects include projects planned for (i) reliability, (ii) operational performance, (iii) FERC Form No. 715 criteria, (iv) economic planning, and (v) public
policy planning (State Agreement Approach). Supplemental Projects refers to transmission expansion or enhancements not needed to comply with PJM reliability, operational performance, FERC Form No. 715, economic criteria or State Agreement Approach projects. Transmission Owners plan Supplemental Projects in accordance with the Attachment M-3 Process. Projects planned through the Attachment M-3 Process include those that expand or enhance the transmission system and could include needs addressing transmission facilities at the end of their useful life, which, in accordance with good utility practice, is not determined by the facility’s service life for accounting or depreciation purposes. Customer-Funded Upgrades refer to Network Upgrades, Local Upgrades or Merchant Network Upgrades identified pursuant to OATT Parts II, III and VI and paid for by the Interconnection Customer or Eligible Customer or voluntarily undertaken by a New Service Customer in fulfillment of an Upgrade Request.

Planning of Baseline Projects:

Baseline Projects are produced from PJM’s planning cycle activities described in this manual, Operating Agreement Schedule 6, and illustrated in Exhibit 1 in this Manual. PJM leads the analysis and development of Baseline Projects related to reliability, operational performance, FERC Form No. 715 criteria and economic planning for all facilities 100 kV and above under PJM’s operational control. These facilities are designated as Bulk Electric System (BES) facilities and are subject to the North American Electric Reliability Corporation (NERC) standards and criteria for such facilities. The PJM analyses ensure compliance with NERC, PJM and any applicable Regional Entity criteria (e.g. Reliability First (RF) or SERC Reliability Corporation (SERC)). In addition, the PJM-led analyses also include analysis of and solutions for transmission facilities with nominal voltages below 100kV to the extent they are under PJM’s operational control (see http://www.pjm.com/markets-and-operations/ops-analysis/transmission-facilities.aspx). The TEAC and Subregional RTEP Committees provide the opportunity for stakeholders to engage in the PJM transmission planning process of such facilities, as described in this Manual. In addition, for transmission facilities under PJM operational control, the Transmission Owner may submit its local planning criteria in its FERC Form No. 715 filing.

Transmission Owner Supplemental Projects:

Supplemental Projects refer to a transmission expansion or enhancement not needed to comply with PJM reliability, operational performance, FERC Form No. 715 or economic criteria and is not a State Agreement Approach project. Transmission Owners plan Supplemental Projects in accordance with the Attachment M-3 Process. Projects planned through the Attachment M-3 Process could include those that: (i) expand or enhance the transmission system; (ii) address Transmission Owner zonal reliability issues; (iii) maintain the existing transmission system; (iv) comply with regulatory requirements or (v) implement Transmission Owner asset management activities (which could include needs related to a transmission facility approaching the end of its useful life, which, in accordance with good utility practice, is not determined by the facility’s service life for accounting or depreciation purposes).

Pursuant to the Attachment M-3 Process, Supplemental Projects are presented through the TEAC (230 kV and above facilities.) or the Subregional RTEP Committees (below 230 kV facilities) for review and comment in a three-part meeting process that includes at a minimum (i) an Assumptions Meeting, (ii) a Needs Meeting and (iii) a Solutions Meeting. The Subregional RTEP Committees’ Solutions Meetings are followed by a round of comments
before the Transmission Owners finalize the Supplemental Projects. The stakeholders are provided a final comment period before the Supplemental Project is included in the Local Plan. Supplemental Projects included in the Local Plan are provided to the TEAC and the PJM Board as informational before integrating the Supplemental Project into the RTEP base case. Supplemental Projects are not approved by the PJM Board. It should also be noted that prior to integrating a Supplemental Project into the RTEP base case PJM performs a “do no harm study” to evaluate whether a proposed Supplemental Project will adversely impact the reliability of the Transmission System as represented in the planning models used in all other PJM reliability planning studies. As part of the review of Supplemental Projects, PJM will determine if a proposed Supplemental Project meets the Operating Agreement Definition of Supplemental Project. Proposed Supplemental Projects not meeting the Operating Agreement Definition of Supplemental Project will not be included in the RTEP Models. Once PJM determines that the proposed Supplemental Project will not adversely impact the reliability of the Transmission System, the proposed Supplemental Project may be integrated into the RTEP base case, consistent with Schedule 6. In this way Supplemental Projects are subject to similar open, transparent and participatory PJM committee activities, as are PJM RTEP Projects (comprising Regional RTEP Projects and Subregional RTEP Projects; see discussion of TEAC and Subregional RTEP Committees.) As part of the review of Supplemental Projects, PJM will determine if the Supplemental Projects might eliminate a baseline violation identified in the RTEP processes which may be in progress. PJM will also apprise the relevant Transmission Owner if an RTEP Project is identified which might alleviate the need for a Supplemental Project. Any changes to the need associated with a Supplemental Project or baseline project will also be discussed with the PJM stakeholders.

Planning for Customer-Funded Upgrades is performed through PJM’s New Services Queue and includes Network Upgrades, Local Upgrades or Merchant Network Upgrades identified pursuant to OATT Parts II, III and VI. Studies of interconnection and transmission service requests and any resulting transmission modifications are posted to PJM’s website in the project queue area (http://www.pjm.com/planning/generation-interconnection.aspx). In addition, any necessary transmission facility modifications are brought to the TEAC for presentation and stakeholder participation. Interconnection planning is discussed in more detail in Manual 14A.

1.2 TEAC and Subregional RTEP Committee and Related Activities

The PJM TEAC functions in accordance with its established charter and provisions of the Operating Agreement, Schedule 6. Additionally, in 2008 PJM began to facilitate more localized planning functions through the Subregional RTEP Committees.

The TEAC and Subregional RTEP Committees provide a transparent and participatory planning process throughout the development of the RTEP, from early assumptions-setting stages to discussion of criteria violations and/or identified system needs, review of recommendations for alternative solutions and then review and comment regarding the solutions incorporated into the RTEP base case.

The Subregional RTEP Committees allow more focused and meaningful stakeholder participation and attention to the subregional and local Transmission Owner zonal issues. Currently there are
three PJM RTEP subregions: Mid-Atlantic, Southern, and Western. When a Subregional RTEP Committee meeting is needed and scheduled, it generally will be implemented as a separate meeting for each subregion.

All PJM stakeholders can participate in any or all subregional activities on a voluntary basis, with one exception. The exception is that the Transmission Owners that comprise each of
the various subregions must participate in the Subregional RTEP Committee meeting that includes their area and each Transmission Owner must be present at the TEAC meeting where its Supplemental Projects are presented. PJM will facilitate TEAC and Subregional RTEP Committees to review Regional RTEP Projects, Subregional RTEP Projects and Supplemental Projects. PJM, with stakeholder input, may initiate additional Subregional RTEP Committees meetings consistent with OATT, Attachment M-3 to review and address stakeholder questions or concerns regarding needs or proposed solutions, as may be necessary or beneficial. Separate local meetings or more localized reviews may also be held by individual PJM Transmission Owners in the event that the individual Transmission Owner decides that it is a more appropriate way to address local issues. In addition to their participation in the TEAC and Subregional RTEP Committees meetings, stakeholders can also provide written comments on the development of the RTEP. Written comments can be provided to PJM through the Planning Community on PJM.com.

For administrative convenience, RTEP projects (i.e., baseline projects) are separated into Regional RTEP Projects (230 kV and above) and Subregional RTEP Projects (below 230 kV) (referred to collectively herein as “RTEP Projects”), as defined in the Operating Agreement, in order to make an initial categorization and posting of violations and upgrades that will enable stakeholders to more easily sort through and review issues of interest.

Regional RTEP Projects and Supplemental Projects (230 kV and above) will be reviewed at the TEAC. Subregional RTEP Projects and Supplemental Projects (below 230 kV) will be reviewed at the applicable Subregional RTEP Committee. The Subregional RTEP Committee is responsible for the initial review of Subregional RTEP Projects. For Regional and Subregional RTEP Projects, the TEAC and Subregional RTEP Committees follow the procedure set forth in the Operating Agreement, Schedule 6 specific to the TEAC and other applicable PJM committee procedures. For Supplemental Projects subject to Attachment M-3, the Attachment M-3 Process will apply.

Review of RTEP Projects and Supplemental Projects at the TEAC and/or Subregional RTEP Committees normally occurs during the February through August RTEP stakeholder analysis and review periods (see Exhibit 1). However, additional Supplemental Projects for unforeseen needs that a PJM Transmission Owner identifies later in the year will follow OATT, Attachment M-3 Process for inclusion in the RTEP.

Stakeholders will be provided the information necessary for participation in the discussions and evaluations, including: (1) the PJM and/or Transmission Owners models, criteria and assumptions that underlie transmission system plans, (2) the procedure to access the study information necessary to replicate the PJM and/or Transmission Owner planning studies and participate in the evaluation and discussion of the identified need, (3) information regarding the project proposed to address the identified need, (4) the current cost estimate for the project, and (5) a description of the proposed modifications to existing facilities that may be part of the project.

In addition, projects that originate through Transmission Owner planning will be posted on the PJM web site. This site will include all currently planned Baseline and newly planned Supplemental Projects and Transmission Owner Initiated projects from past RTEP cycles that are yet to be placed in-service. This website will provide tracking information about the status of listed projects and planned in-service dates. It will also include information regarding criteria, assumptions and availability of study cases.
1.3 Planning Assumptions and Model Development

1.3.1 Reliability Planning (including Operational Performance and Public Policy Planning)
PJM’s planning analyses are based on a consistent set of fundamental assumptions regarding load, generation and transmission built into power flow models. Load assumptions are based on the annual PJM entity load forecast independently developed by PJM (found at http://www.pjm.com/planning/resource-adequacy-planning/load-forecast-dev-process.aspx.) This forecast includes the basis for all load level assumptions for planning analyses throughout the 15 year planning horizon. Generation and transmission planning assumptions are embodied in the base case power flow models developed annually by PJM and derived from the Eastern Reliability Assessment Group processes and procedures pursuant to NERC standard MOD-032, as well as Transmission Owners’ assumptions included in their respective FERC Form No. 715. As necessary, PJM updates those models with the most recent data available for its own regional studies. All PJM base power flow and related information are available pursuant to applicable Critical Energy Infrastructure Information, Non-Disclosure and OATT-related requirements (accessible via http://www.pjm.com/planning/rtep-development/powerflow-cases.aspx or by contacting the PJM Planning Committee contacts.) Each type of RTEP analysis (e.g., load deliverability, generator deliverability etc.) encompasses its own methodological assumptions as further described throughout the rest of this Manual. Additional details regarding the reliability planning criteria, assumptions, and methods can be found in following sections and this manual’s Attachments.

Attachment J contains the checklist for the new equipment energization process to be utilized by Transmission Owners and Designated Entities from inception to energization of upgrade projects.

1.3.2 Economic Planning
PJM will perform a market efficiency analysis each year, following the completion of the near-term reliability plan for the region. PJM’s market efficiency planning analyses will utilize many of the same starting assumptions applicable to the reliability planning phase of the RTEP development. In addition, key market efficiency input assumptions, used in the projection of future market inefficiencies; include load and energy forecasts for each PJM zone, fuel costs and emissions costs, expected levels of potential new generation and generation retirements and expected levels of demand response. PJM will input its study assumptions into a commercially available market simulation data model that is available to all stakeholders. The data model contains a detailed representation of the Eastern Interconnection power system generation, transmission and load. In addition, the market efficiency analysis of the cost/benefit of potential market efficiency upgrades will also include the discount rate and annual revenue requirement rate. The discount rate is used to determine the present value of the enhancements’ annual benefits and annual cost. The annual revenue requirement rate is used to determine the enhancements’ annual cost. PJM will finalize the market efficiency analysis input assumptions soon after the development of the PJM load forecast that is generally available approximately in late January. Prior to finalizing, PJM will review the proposed assumptions at the PJM Transmission Expansion Advisory Committee. This review will provide the opportunity for stakeholder review of and input to all of the key assumptions that form the basis of the market efficiency analysis. In this way, PJM will facilitate a comprehensive stakeholder review and input regarding RTEP study assumptions. All final assumptions and analysis parameters will be presented to the TEAC for discussion and review and to the PJM Board for consideration.
1.3.3 FERC Form No. 715

The Transmission Owner’s process specific to the Transmission Owner’s zone, including projects that could address the end of useful life of existing facilities, which, in accordance with good utility practice, is not determined by the facility’s service life for accounting or depreciation purposes, may be memorialized as Transmission Owner planning criteria under the Transmission Owner’s FERC Form No. 715.

1.3.4 Supplemental Projects

Supplemental Projects are included in both PJM and Transmission Owners planning models for the applicable reliability studies conducted outside the Attachment M-3 Process, to the extent the Supplemental Project impacts the transmission system.

The Transmission Owners’ planning of Supplemental Projects follows the sequence of steps set out in OATT, Attachment M-3. PJM will include in the activities associated with the model development for the next year’s RTEP, which begins in September (see 18-month planning cycle illustrated in Exhibit 1 in this Manual), those Supplemental Projects included in the Local Plans submitted for incorporation into the PJM planning model in the July timeframe.

Additional Supplemental Projects for unforeseen, customer driven expansions or enhancements that a PJM Transmission Owner identifies later in the year, and which are finalized after July, may be included in the base case if the inclusion of these projects would not disrupt analysis associated with the development of the RTEP violations.

Nothing in this section affects the requirements for either inclusion or removal of upgrades as further discussed in sections 1.4.2 and 1.4.3 of this Manual.

1.4 RTEP Process Key Components

PJM’s goal is to ensure electric supply adequacy and to enhance the robustness of energy and capacity markets. Achieving these objectives requires the successful completion of PJM’s planning, facility construction and operational and market infrastructure requirements.

1.4.1 Key Process Components

Key components of PJM’s 15-year transmission planning process discussed in this Manual include:

1.4.1.1 Baseline reliability analyses:

The PJM Transmission System (“PJM System”) provides the means for delivering the output of interconnected generators to the load centers in the PJM energy and capacity markets. Baseline reliability analyses ensure the security and adequacy of the Transmission System to serve all existing and projected long term firm transmission use including existing and projected native load growth as well as long term firm transmission service. RTEP baseline analyses include system voltage and thermal analysis, and stability, load deliverability, and generator deliverability testing. These tests variously entail single and multiple contingency testing for violations of established NERC reliability criteria regarding stability, thermal line loadings and voltage limits. Baseline reliability analyses are discussed in more detail in Section 2 and Attachment C.
2. **1.4.1.2 Economic analyses (Market Efficiency studies):**

   In addition to reliability based analyses PJM also evaluates the economic merit of proposed transmission enhancements. These analyses focus on the economic impacts of security constraints on production cost, congestion charges to load and other econometric measures of market impacts. PJM’s market efficiency analyses are
discussed in Section 2 of this Manual and Attachment E. PJM development of economic transmission enhancements is also codified under Schedule 6 of the PJM Operating Agreement.

3. **1.4.1.3 Operational performance issue reviews and accompanying analyses:**

Maintaining a safe and reliable Transmission System also requires keeping the transmission system equipment in safe, reliable operating condition as well as addressing actual operational needs. On an ongoing basis, PJM operating and planning personnel assess the PJM transmission development needs based on recent actual operations. This may lead to special studies or programs to address actual system conditions that may not be evident through projections and system modeling.

To ensure that system facilities are maintained and operated to acceptable reliability performance levels, PJM has implemented an Aging Infrastructure Initiative to evaluate appropriate spare transformer levels and optimum equipment replacement or upgrade requirements. This initiative, based on a Probability Risk Assessment (PRA) process, is intended to result in a proactive, PJM-wide approach to assess the risk of facility failures and to mitigate operational and market impacts. Section 2 of this manual provides further discussion of the PRA process.

4. **1.4.1.4 FERC Form No. 715**

Each Transmission Owner specifies reliability criteria it uses to evaluate system performance in its FERC Form No. 715 filing. As part of the RTEP process, PJM will identify system needs using each Transmission Owner’s planning criteria, which could include end of useful life, which, in accordance with good utility practice, is not determined by the facility’s service life for accounting or depreciation purposes and other asset management activities, reflected in the Transmission Owner’s FERC Form No. 715.

5. **1.4.1.5 Supplemental Project Planning**

Transmission Owner may identify a need associated with a transmission expansion or enhancement not required to comply with the PJM reliability, operational performance, FERC Form No. 715 or economic criteria and is not a State Agreement Approach project. The PJM Transmission Owners plan Supplemental Projects in accordance with the Attachment M-3 Process. Projects planned through the Attachment M-3 Process could include those that: (i) expand or enhance the transmission system; (ii) address local reliability issues; (iii) maintain the existing transmission system; (iv) comply with regulatory requirements; or (v) implement Transmission Owner asset management activities (which could include needs related to a transmission facility approaching the end of its useful life, which, in accordance with good utility practice, is not determined by the facility’s service life for accounting or depreciation purposes.

PJM will determine if a proposed Supplemental Project meets the Operating Agreement Definition of Supplemental Projects. Proposed Supplemental Projects not meeting the Operating Agreement Definition of Supplemental Projects will not be included in the RTEP Models and Supplemental Project review process, per the OATT, Attachment M-3.
6. **1.4.1.6 Customer-Funded Upgrade analyses:**

All entities requesting interconnection of a generating facility (including increases to the capacity of an existing generating unit) or requesting interconnection of a merchant transmission facility within the PJM RTO must do so within PJM’s defined interconnection process. In addition to the baseline analyses discussed above, as
resources or merchant transmission requests interconnection, deliverability in the local area of the request is restudied and updated. The generation and transmission interconnection process and deliverability testing procedures are discussed in Attachment C and Manual 14A. The evaluation of generation and merchant transmission interconnection requests is codified in the PJM Open Access Transmission Tariff (available on the PJM Web site at http://www.pjm.com/).

### 1.4.1.7 The Final RTEP Plan:

Based on all of the requirements for firm transmission service on the PJM System, PJM develops an annual RTEP to meet those requirements on a reliable, economic system development and environmentally acceptable basis.

Furthermore, by virtue of its regional scope, the RTEP process assures coordination of expansion plans across multiple transmission owners’ systems, permitting the identification of the most efficient or cost-effective expansion plan for the region. The RTEP developed through this process is reviewed by PJM’s independent Board of Managers who has the final authority for approval of the RTEP (except approval of Supplemental Projects) and implementation. The following Section 2 describes the PJM RTEP Process analysis.

#### 1.4.2 Key Process Component Interactions

The Regional Transmission Expansion Plan (RTEP) incorporates changes to the system based on the process drivers outlined in section 1.4.1 in the form of reinforcements to the system as three different types of upgrades: 1) items 1.4.1 – 1.4.4 resulting in baseline upgrades (see 1.4.1 – 1.4.4); 2) item 1.4.5 resulting in Supplemental Projects (see 1.4.5); and 3) item 1.4.6 resulting in Network Upgrades (see 1.4.6). These transmission system reinforcements to the system for one process driver may require the modification of facilities which were identified for another process driver. During the course of the review of any upgrade, whether it is a Network Upgrade, baseline upgrade, or Supplemental Project, PJM will work with the Transmission Owners and the Stakeholders to identify any upgrades, or portions of the upgrades, which have common system elements in order to determine the proper classification of a project as based on one or more of these types of upgrades drivers.

In the event that all or a portion of a baseline upgrade is required for a previously identified Supplemental Project or a Network Upgrade, the baseline upgrade will be classified as needed, and constructed as a baseline upgrade. Only if the Supplemental Project or Network Upgrade does not move forward in construction, Any identification of the need for a baseline upgrade will require that PJM administer the processes to identify the violation as available for competitive solicitation under the rules established in Schedule 6 of the Operating Agreement.

PJM will note in the RTEP that the baseline need exists and will only cancel the baseline upgrade with the approval of the PJM Board. PJM shall post a written explanation for its decision to cancel the baseline upgrade at the applicable subregional RTEP committee or TEAC and will also provide it to the applicable federal, state or municipal authority for project siting or approval.

when the Network Upgrade or Supplemental Project is constructed in a timeframe which mitigates the baseline need for an baseline upgrade.
1.4.3 Addition and removal of upgrades from RTEP power flow base cases

The development of a Regional Transmission Expansion Plan (RTEP) requires that PJM maintain a base case to be used in various types of analysis. PJM must solidify finalize the assumptions in a base case and in order to move forward with the analysis while incorporating only a minimal minimizing the amount of modeling changes to the base case on a normal basis. In order to provide that the system topology in the RTEP base case is to be stable, PJM will employ the following guidelines for all upgrades:

1. Baseline upgrades will be included in the next RTEP case if the baseline upgrade is approved by the PJM Board in accordance with Schedule 6 of the Operating Agreement.

2. Network Upgrades will be included in the next RTEP case if 1) the Network Upgrades are associated with a New Service Queue Request which has executed an Interconnection Service Agreement or 2) if the completion of the RTEP requires incorporation of New Service Queue Requests which are at the Facilities Study stage in the queue process in order to meet the new load requirements resulting from normal forecasted load growth.

3. Supplemental Projects will be included in the next RTEP case if the Supplemental Project was included in the local plan submitted by the Transmission Owner in accordance with Section 1.3.4 of this Manual.

4. Any Network Upgrade removal from applicable cases, may be removed from the RTEP base case in accordance with consistent with termination of the process for a New Service Request as outlined in Part VI of the PJM Open Access Transmission Tariff (OATT) and PJM Manual 14A or an interconnection or Construction Service Agreement.

5. Baseline upgrades and Supplemental Projects may be generally removed in the next RTEP case if a Start Commission confirms the need for the baseline requirement upgrade or Supplemental Project is no longer valid based on the construction status of.
the baseline upgrade/Supplemental Project has not been constructed or progressed to the point that the upgrade or project must be completed in order to maintain the reliability of the system reliability. Baseline requirement validity is determined through a review of the applicable criteria, whether it is reliability criteria, market efficiency criteria, a change in the stated Public Policy driver, or change in status of the operational performance driver for the upgrade. PJM will apprise the relevant Transmission Owner, PJM stakeholders, and any applicable federal, state or municipal authority for project siting or approval of any changes to the baseline requirement or need associated with a project so that it is no longer deemed valid.

5. Baseline upgrades, Supplemental Projects, and Network Upgrades may be removed from the next RTEP base case if a relevant federal, state, local or municipal authority makes a final determination that there is no legal means by which construction of the baseline upgrade or Supplemental Project construction might be completed.

6. Supplemental Projects will generally be removed from the RTEP case if a relevant federal, state, local or municipal authority makes a final determination denying construction of the upgrade and the removal of these projects would not disrupt analysis associated with the development of the RTEP violations.