



Remaining Issues to Address in Manual 14B following LS Power Motion at June 2019 MRC

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Special PC RTEP Process
Enhancements
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- LS Power has indicated concerns about ensuring PJM's fundamental authority over its Regional Plan as reflected in its Operating Agreement
 - PJM does not believe any authority, as granted by FERC, is being infringed

1. Supplemental Projects Should Not Be Able to be Converted to Baseline Projects
2. Supplemental Projects should be displaced through regional planning
3. Need to maintain the Integrity of the Order 1000 Project Proposal Windows
4. PJM should retain authority over the removal of Supplemental Projects from the RTEP if Permits Are Denied in Final Agency Order

- Supplemental Projects Should Not Be Able to be Converted to Baseline Projects
 - PJM manual language does not convert any type of project to a baseline upgrade
 - Manual language requires that process be informed by any other issues which might impact the violations identified in the Project Proposal Window (Operating Agreement, Section 1.5.8 (c)(ii))

- Supplemental Projects should be displaced through regional planning
 - Manual language allows PJM to continue to identify a baseline upgrade when this is needed to meet required criteria as specified in the Operating Agreement

- Need to maintain the Integrity of the Order 1000 Project Proposal Windows
 - PJM manual language retains all requirements of the Operating Agreement associated with the development of violations, opening Project Proposal Windows, and identifying baseline upgrades

- PJM should retain authority over the removal of Supplemental Projects from the RTEP if Permits Are Denied in Final Agency Order
 - PJM language currently allows for PJM to remove projects from the RTEP when this is appropriate and following discussions with stakeholders

- PJM feels current PJM version of the manual properly address the issues identified
- PJM looking for any additional feedback to prepare for July 18 Special PC
 - Feedback requested from stakeholders by 5 PM on July 15