PJM TOP/TO Relationship
Compliance Reporting Process

TOA-AC
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• PJM NERC-Registered Transmission Operator (TOP)
• Member Transmission Owners (TOs) NERC-Registered TO
  – Member TOs are delegated a variety of TOP-related tasks
    • Tasks outlined in TOP/TO Matrix – updated regularly
    • PJM governing agreements (CTOA, OA, RAA) provide authority
  – PJM remains primarily responsible to RF/NERC for all TOP standards
    • OA Schedule 11 provides for allocation of resulting penalties if required
What happens if a TOP Standard is violated?

- PJM remains primarily responsible for TOP standard compliance
  - Issues identified during triennial BA/RC/TOP audit
  - Potential violations detected during PJM audits of TOs
  - Self-identified issues

- PJM is the primary interface with the regulator prior to TO intervention
  - Self-report
  - Mitigation plans
Enforcement Process

- RF Issues Notice of Preliminary Screen to PJM
- PJM requests RF determination of responsibility
  - NERC CMEP – Appendix 4C, Section 5.11
  - Copy of request provided to TO
- PJM issues notification to TO, requesting participation in proceeding
  - OA Schedule 11, Section 1.3
- RF grants intervention
  - Parties must execute NDA
- Importantly – Responsibility determined regardless of TO participation
How can you help?

- **Timeliness**
  - Discuss issue with PJM compliance as soon as possible

- **Collaboration**
  - Open and direct communications

- **Responsiveness**
  - Data requests
  - Dialogue