

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Independent Market Monitor for PJM)	
v.)	Docket No. EL19-47-000
PJM Interconnection, L.L.C.)	
)	
Office of the People’s Counsel for District of Columbia)	Docket No. EL19-63-000
Delaware Division of the Public Advocate)	
Citizens Utility Board)	
Indiana Office of Utility Consumer Counselor)	
Maryland Office of People’s Counsel)	
Pennsylvania Office of Consumer Advocate)	
West Virginia Consumer Advocate Division)	
PJM Industrial Customer Coalition)	
v.)	
PJM Interconnection, L.L.C.)	
)	
PJM Interconnection, L.L.C.)	Docket No. ER21-2444-000
)	
PJM Interconnection, L.L.C.)	Docket No. ER21-2877-000

**COMPLIANCE FILING CONCERNING
CERTAIN PROPOSED REVISED PRE-AUCTION DEADLINES,
REQUEST FOR WAIVER OF RPM AUCTION DEADLINES,
AND MOTION FOR A SHORTENED COMMENT PERIOD OF 7 DAYS**

In compliance with the September 2, 2021 Order Establishing Just and Reasonable Rate of the Federal Energy Regulatory Commission (“Commission” or “FERC”) in the above referenced proceedings,¹ PJM Interconnection, L.L.C. (“PJM”) hereby submits revised pre-auction deadlines impacted by the revised Market Seller Offer Cap (“MSOC”) for the Base Residual Auction (“BRA”) associated with the 2023/2024 Delivery Year. Through this filing, PJM also submits a request for a prospective waiver, pursuant to Rule

¹ *PJM Interconnection, L.L.C.*, 176 FERC ¶ 61,137 (2021) (“September 2 Order”).

207(a)(5) of the Commission's Rules of Practice and Procedure,² to further delay the upcoming BRA by a modest 55 days in order to allow for the orderly administration of the next auction under the revised MSOC rules.³ Given the proposed condensed timelines, PJM is also seeking a shortened comment period on this compliance filing and waiver request so that the Commission can expedite an order and provide market certainty on the timing of the pre-auction deadlines and upcoming BRA date.

I. SATISFACTION OF THE COMPLIANCE REQUIREMENTS OF THE SEPTEMBER 2 ORDER.

In accordance with the Commission's September 2 Order, PJM submits this filing to propose revised deadlines for pre-auction activities that are impacted by the revised MSOC. In particular, PJM is proposing new deadlines for Capacity Market Sellers to submit a must-offer exception request associated with resource deactivations and the deadline for Capacity Market Sellers to request a unit-specific offer cap. In light of the September 2 Order, PJM proposes that the revised deadlines for both of these submissions be moved to October 1, 2021.⁴ This will provide Capacity Market Sellers three weeks to determine whether to seek a unit-specific offer cap and, if so, to prepare the necessary supporting documentation in seeking a unit-specific offer cap. At the same time,

² 18 C.F.R. § 385.207(a)(5).

³ It is noted that the upcoming BRA associated with the 2023/2024 Delivery Year would normally have been conducted in May of 2020. However, the Commission previously granted a waiver to delay this auction to December 1, 2021 as part of the Minimum Offer Price Rule ("MOPR") proceedings. *See* PJM Interconnection, L.L.C., 173 FERC ¶ 61,061 (2020).

⁴ The current deadlines for Capacity Market Sellers to request must-offer exception requests associated with resource deactivations and submission of unit-specific offer cap requests were July 19, 2021 and August 3, 2021, respectively. These deadlines were set based on the Commission's order granting PJM's March 2020 waiver request. *See* PJM Interconnection, L.L.C., 173 FERC ¶ 61,061 (2020).

consolidating the deadline for these submissions to the same date will save some time and allow PJM to conduct the upcoming BRA without significant additional delays.

Besides amending this deadline, PJM is also proposing to push back the deadline for the Independent Market Monitor for PJM (“Market Monitor”) to review and propose a recommendation on Market Sellers’ unit-specific offer cap and/or must-offer exception request associated with resource deactivations (currently set as September 2, 2021) to October 31, 2021. This will provide the Market Monitor with the usual 30 day period from the unit-specific offer cap and must-offer submission deadline to review and provide its proposed recommendation of various unit-specific offer cap and must-offer exception requests.

In addition, PJM proposes to provide Capacity Market Sellers with five days to review the Market Monitor’s recommendation and notify PJM and the Market Monitor whether it agrees with the unit-specific offer cap or must-offer exception associated with resource deactivations proposed by the Market Monitor (*i.e.*, November 5, 2021). This will provide Capacity Market Sellers time to review the Market Monitor’s proposed unit-specific offer cap before notifying PJM and the Market Monitor whether it agrees with such proposal.

Finally, PJM proposes to maintain the normal 25 day period for PJM to make its final determination of the unit-specific offer cap and/or must-offer exception request associated with resource deactivations where there is disagreement between the Market Monitor and the Capacity Market Seller (*i.e.*, November 25, 2021). For simplicity and clarity, Table 1 below shows the current deadlines for the various revised pre-auction

deadlines associated with the MSOC (based on the Commission’s last waiver order)⁵ and the proposed new deadlines for such activities that is the subject of this compliance filing.

Table 1. 2023/2024 BRA Market Seller Offer Cap related pre-auction activities

Activity Type	Activity	Current Dates	Proposed Dates
Must Offer	Last day for Capacity Market Sellers to request must-offer exception for the reason specified under OATT Attachment M-Appendix § II.C.4.A	7/19/21, Mon	10/1/21, Fri
Sell Offer Caps	Last day for Capacity Market Sellers to submit sell offer cap data	8/3/21, Tue	10/1/21, Fri
Sell Offer Caps	IMM provides participant with determination of offer cap	9/2/21, Thu	10/31/21, Sun
Must Offer	IMM provides participant with determination on must offer exception	9/2/21, Thu	10/31/21, Sun
Sell Offer Caps	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination of offer cap	9/12/21, Sun	11/5/21, Fri
Must Offer	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination on must offer exception	9/12/21, Sun	11/5/21, Fri
Sell Offer Caps	PJM notifies participant/IMM of determination on proposed offer cap	9/27/21, Mon	11/25/21, Thu
Must Offer	PJM notifies participant/IMM of its determination on must offer exception for the reason specified under OATT Attachment M-Appendix § II.C.4.A	9/27/21, Mon	11/25/21, Thu
Must Offer	Last day for Capacity Market Sellers to notify PJM/IMM whether it intends to exclude from its Sell Offer some or all capacity from its generation resource on the basis of an identified exception to the RPM Must Offer Obligation	9/27/21, Mon	11/25/21, Thu

Under these revised deadlines, PJM would be able to provide the final unit-specific offer cap determinations by November 25, 2021, in advance of the currently scheduled December 1, 2021 BRA. However, despite best efforts to further compress this timeline, the revised dates simply do not provide sufficient time for Capacity Market Sellers to seek additional remedies from the Commission prior to the commencement of the auction in the likely event there are disagreements with PJM’s final unit-specific offer cap

⁵ See PJM Interconnection, L.L.C., 173 FERC ¶ 61,061 (2020).

determinations. Given the potential disruptions and market uncertainty that could arise if multiple complaints are filed days before the scheduled BRA, on balance, PJM believes that delaying the next auction slightly will allow for a more orderly administration under the new MSOC rules. As a result, and as further described below, PJM is requesting that the upcoming BRA associated with the 2023/2024 Delivery Year be delayed by a modest 55 days to allow parties to seek additional remedies from the Commission prior to the commencement of the auction.

II. REQUEST FOR WAIVER TO FURTHER DELAY THE BASE RESIDUAL AUCTION ASSOCIATED WITH THE 2023/2024 DELIVERY YEAR.

PJM does not make the decision to seek a further delay of the already delayed upcoming BRA lightly. PJM strongly believes the three-year forward nature of the capacity auctions is a critically important feature of the Reliability Pricing Model construct and would prefer to expeditiously conduct the upcoming auctions without delay. At the same time, however, given the expected volume of unit-specific requests stemming from the significant change to the MSOC rules, PJM believes that a revised timeframe must be established to allow for an orderly and complete Market Monitor and PJM review of all such requests. At the same time, it is important that Capacity Market Sellers and the Market Monitor have a realistic opportunity to appeal PJM's final decisions to the Commission prior to the start of the next BRA.

Given that the Commission's order was issued on September 2, 2021, there is simply no realistic scenario for PJM and the Market Monitor to review and make final unit-specific offer cap and must-offer determinations more than 60 days prior to the currently scheduled December 1, 2021 BRA. PJM consulted with stakeholders about the feasibility

of an even shorter pre-auction schedule than what is being proposed above.⁶ However, any timeline that is shorter than what is being proposed would not provide many Capacity Market Sellers with sufficient time to prepare the necessary supporting documentation as part of the unit-specific offer cap request – particularly given that this would be the first time the majority of Capacity Market Sellers will ever have needed to request a unit-specific offer cap and such request may take a significant amount of time and effort to complete. Further, PJM, and likely the Market Monitor, would not be able to complete the unit-specific offer cap review within a shorter period of time.⁷

As a result, pursuant to Rule 207(a)(5) of the Commission’s Rules of Practice and Procedure,⁸ PJM is seeking a modest delay of the currently scheduled December 1, 2021 BRA to allow for the orderly administration of the upcoming auction under the revised MSOC rules. Specifically, PJM is proposing to delay the next BRA by 55 days to January 25, 2022. This modest delay will allow 60 days for Capacity Market Sellers and the Market Monitor to seek remedies from the Commission prior to the commencement of the next BRA. This is necessary and appropriate given PJM’s expectation that many Capacity Market Sellers and/or the Market Monitor will inevitably disagree with the final unit-specific offer cap determinations. Indeed, based on the information currently available to PJM, none of the unit-specific offer caps requested to date under the existing pre-auction

⁶ See Proposed 23-24 BRA Auction Schedule, available at: <https://www.pjm.com/-/media/committees-groups/committees/mic/2021/20210909/20210909-item-13b-proposed-23-24-bra-auction-schedule.ashx>

⁷ PJM expects the unit-specific offer cap review process to require more effort than even the existing unit-specific Minimum Offer Price Rule review process. As such, the unit-specific net ACR determinations will be administratively challenging to complete even within a 21 day period, due to the expected high volume of requests and the complexity of each request. Nonetheless, PJM is willing to commit to this amount of time for completing its review of the unit-specific offer caps in the interest of conducting the next BRA without significant additional delays.

⁸ 18 C.F.R. § 385.207(a)(5).

deadlines for the 2023/2024 BRA have been accepted by the Market Monitor. As a result, it is likely that either the Capacity Market Seller or the Market Monitor (or both) will disagree with PJM's final unit-specific offer cap determination. Without such a delay of the auction, Capacity Market Sellers and the Market Monitor simply would not have sufficient time to seek additional remedies from the Commission, and the Commission would not have enough time to issue orders on such complaints, before the completion of the next BRA.

While the Commission is not required to act within 60 days of such a complaint, it would be much more reasonable and realistic for the Commission to act on such complaints within 60 days rather than a shorter time period. In fact, PJM's Tariff gives Capacity Market Sellers at least 60 days to seek additional remedies from the Commission should a Capacity Market Seller disagree with PJM's final determination.⁹ In the event the Commission does not act on a complaint prior to the conduct of the upcoming BRA, PJM intends to proceed with the conduct of the auction and mitigate resources subject to the MSOC based on the unit-specific offer cap determined by PJM.

Through this waiver, PJM is also proposing to retain all pre-auction Tariff defined activity deadlines that were previously posted consistent with the Commission's order on PJM's initial March 2020 waiver (except for those specified as part of the compliance filing above).¹⁰ Because the previous waiver relating to the BRA that the Commission granted set various pre-auction activity dates based on a specific number of number of days prior to the relevant RPM Auction, revising the BRA date could mean the all of the associated

⁹ See Tariff, Attachment DD, section 6.4(b).

¹⁰ See Posted BRA Schedule, available at: <https://www.pjm.com/-/media/markets-ops/rpm/rpm-auction-info/rpm-auction-schedule.ashx>

pre-auction deadlines for the 2023/2024 Delivery Year would also be extended by 55 days. However, given that these dates were previously posted and unrelated to the revised offer cap, there is no reason to reopen and extend those pre-auction deadlines not specified in the compliance filing above associated with the 2023/2024 BRA. Further, extending pre-auction activities unrelated to the MSOC would only lead to confusion and administrative complexity in the market since many of the currently published dates will have passed prior to the receipt of a Commission order on extending such dates. As a result, PJM requests that the Commission allow PJM to maintain the existing deadlines (which have been posted on the PJM website)¹¹ for all other pre-auction activities not related to the MSOC for the 2023/2024 BRA.¹²

It is noted, however, that delaying the BRA associated with the 2023/2024 Delivery Year will necessitate delaying the subsequent BRAs and one Incremental Auction through the 2026/2027 Delivery Years. This will allow for pre-auction activities to commence two weeks after each BRA result is posted and is consistent with the Commission's prior waiver order granting PJM's initial waiver request to delay the RPM Auctions.¹³ It is necessary to maintain the six and a half month gaps between auctions for subsequent BRAs so that Market Participants have sufficient time to review the results of each auction before deciding whether to continue offering a resource in the subsequent auction. To be clear, the Commission already previously granted PJM's prior waiver request to delay the RPM

¹¹ See Posted BRA Schedule, available at: <https://www.pjm.com/-/media/markets-ops/rpm/rpm-auction-info/rpm-auction-schedule.ashx>

¹² For additional clarity, PJM is including, as Attachment A of this filing, a list of all deadlines associated with all pre-auction tariff defined activities for the 2023/2024 BRA. This attachment includes all existing deadlines as well as the revised proposed pre-auction activities impacted by the new MSOC rules.

¹³ See *PJM Interconnection, L.L.C.*, 173 FERC ¶ 61,061 (2020) (allowing six and a half months between each BRA through the 2025/2026 Delivery Year).

Auctions and associated pre-auction deadlines through the 2025/2026 Delivery Year by maintaining a 6.5 month gap between each auction.¹⁴ As a result, the Commission does not need to further adjust the previously granted waiver for those RPM Auctions as part of this filing.

Notwithstanding the foregoing, PJM is requesting that the Commission also allow a delay of the RPM Auctions and associated pre-auction deadlines associated with the 2026/2027 Delivery Year as part of this waiver filing. The need to delay the RPM Auctions and associated pre-auction deadlines for the 2026/2027 Delivery Year does not actually arise from the requested 55 day delay of the upcoming BRA. Rather, when PJM filed its initial waiver request in March of 2020, PJM expected that the Commission would issue an order allowing PJM to proceed with the 2022/2023 BRA by December 2020.¹⁵ Unfortunately, in that separate docket, the Commission did not allow the 2022/2023 BRA to be conducted until May 2021.¹⁶ Because of the significant delay with the 2022/2023 BRA, the 2026/2027 BRA will not be able to be conducted in May 2023 as regularly scheduled in accordance with the Tariff requirements¹⁷ as that would require the pre-auction activities associated with that auction to begin before the 2025/2026 BRA is even conducted.¹⁸ As a result, PJM is requesting that the same 6.5 month gap apply between the 2025/2026 BRA and the 2026/2027 BRA. Likewise, PJM requests a waiver of the pre-auction activity

¹⁴ *Id.*

¹⁵ See PJM Compliance Filing and Request for Waiver, Attachment A, Docket Nos. EL16-49, ER18-1314, EL18-178 (filed Mar. 18, 2020) (“March 2020 Filing”)

¹⁶ 173 FERC ¶ 61,061, at P 360.

¹⁷ Tariff, Attachment DD, section 5.4(a).

¹⁸ Currently, the 2025/2026 is scheduled to commence on January 2, 2023 (or February 28, 2023 if this waiver is granted). However, pre-auction activities associated with the 2026/2027 BRA would begin earlier than either of those dates absent a waiver.

timelines for the 2026/2027 RPM Auctions, as shown in Attachment C of this filing. These revised pre-auction activity timelines are based on the same condensed schedule that PJM previously requested, and the Commission previously granted, for the RPM Auctions through the 2025/2026 Delivery Year.¹⁹ PJM is simply proposing to extend the condensed schedule to the RPM Auctions associated with the 2026/2027 Delivery Year as part of this waiver filing. Under this schedule, PJM will conduct the 2027/2028 RPM Auctions in accordance with the usual Tariff requirements so no waiver is needed to delay RPM Auctions or associated pre-auction activities beginning with that Delivery Year.

In addition to the above, there is also one Incremental Auction date that needs to be adjusted from what is currently scheduled to avoid different auctions from being conducted during the same time. Specifically, PJM requests that the Third Incremental Auction associated with the 2023/2024 Delivery Year be delayed by approximately three weeks from the currently scheduled February 27, 2023 date to March 21, 2023. This Third Incremental Auction needs to be adjusted so as to not overlap with the administration of the BRA associated with the 2025/2026 Delivery Year (scheduled to commence on February 28, 2023). For additional clarity, PJM is attaching all of the BRA and Incremental Auction dates through the 2025/2026 Delivery Year as Attachment B of this filing.

Finally, PJM is seeking a waiver of the requirement in Tariff, Attachment DD, section 5.10(v-1)(C) to “calculate the average day-ahead on-peak and day-ahead off-peak energy prices for each month during the Delivery Year *over the most recent thirty trading days as of 180 days prior to the Base Residual Auction.*” Given PJM’s requested waiver

¹⁹ March 2020 Filing; *see also* PJM’s Third Compliance MOPR Filing, Attachment A, Docket Nos. EL16-49, ER18-1314, EL18-178 (filed Nov. 13, 2020)

to delay the upcoming BRA by 55 days, the requirement in this section of the Tariff would also require PJM to use an updated set of energy prices in calculating the Net Energy and Ancillary Services (“Net EAS”) offset. However, PJM already calculated the Net EAS using energy prices in accordance with the Tariff requirements earlier this year for purposes determining the MOPR floor prices (and the deadlines associated with MOPR are not proposed to be updated). In addition, PJM also utilized the Net EAS offset that was calculated for purposes of calculating the Net Cost of New Entry utilized by the Variable Resource Requirement curve. Therefore, it would not be reasonable to use a different set of Net EAS for calculating the MSOC. As a result, PJM seeks to waive the requirements of Tariff, Attachment DD, section 5.10(v-1)(C) only for the BRA associated with the 2023/2024 Delivery Year.

The Commission has granted waiver of tariff provisions where: (1) the applicant acted in good faith; (2) the waiver is of limited scope; (3) the waiver addresses a concrete problem; and (4) the waiver does not have undesirable consequences, such as harming third parties.²⁰ As explained below, the circumstances of PJM’s waiver request satisfies all four of these criteria.

First, PJM is acting in good faith in requesting this prospective waiver given that PJM had hoped a Commission order on a replacement MSOC would have been issued by an earlier date that would not have necessitated a further delay of the upcoming BRA. However, PJM had no control over when the Commission could issue an order establishing a replacement MSOC. Likewise, PJM had expected to conduct the 2022/2023 BRA by

²⁰ See, e.g., *Citizens Sunrise Transmission LLC*, 171 FERC ¶ 61,106, at P 10 (2020); *Midcontinent Indep. Sys. Operator, Inc.*, 154 FERC ¶ 61,059, at P 13 (2016).

December of 2020, but was instead directed to commence that auction in May of 2021 – necessitating the need to delay the RPM Auctions and associated pre-auction deadlines associated with one extra Delivery Year (*i.e.*, 2026/2027).

Second, this waiver request is of limited scope as it is narrowly tailored to directly address the issues identified above by (1) seeking a modest 55 day delay of the upcoming BRA associated with the 2023/2024 Delivery Year, (2) a waiver of the provisions in Tariff, Attachment DD, section 5.10(v-1)(C) only for the BRA associated with the 2023/2024 Delivery Year, (3) a delay of the 2026/2027 RPM Auctions and associated pre-auction activities, and (4) a further three week delay to the Third Incremental Auction associated with the 2025/2026 Delivery Year.²¹

Third, this waiver request remedies a concrete problem given that Capacity Market Sellers will not receive the final unit-specific offer cap determination until November 25, 2021 under the proposed revised pre-auction timelines and this simply does not give parties sufficient time to seek appropriate remedies from the Commission prior to the currently scheduled December 1, 2021 BRA. This waiver request will provide Capacity Market Sellers and the Market Monitor with a more reasonable amount of time to seek a remedy from the Commission in the likely event there is disagreement with PJM's unit-specific offer cap determination – particularly given the expected large volume of unit-specific offer cap requests. In addition, this granting this waiver will allow for the orderly conduct of the subsequent RPM Auctions by ensuring that no auctions overlap in time and that pre-

²¹ As acknowledged above, other BRAs and Incremental Auctions will also be pushed back by 55 days by virtue of the Commission's prior waiver order allowing PJM to space each BRA out by six and a half months.

auction activities for the 2026/2027 BRA do not commence before the conduct of the 2025/2026 BRA.

Finally, the requested waiver will not have undesirable consequences given that a modest 55 day delay of the immediate auction (and subsequent BRAs through the 2026/2027 Delivery Year) will only help to ensure the orderly administration of the upcoming RPM Auctions. While delaying an RPM Auction is never ideal from an investment perspective, on balance, it is appropriate for the reasons provided above. Capacity Market Sellers will all retain the opportunity to offer resources into the RPM Auction sufficiently in advance of the Delivery Year even with this modest delay and resources that clear the auction will continue to receive capacity revenues during the Delivery Year.

III. MOTION FOR A SHORTENED COMMENT PERIOD

Pursuant to Rule 212 of the Commission's Practice and Procedure, PJM respectfully requests that the Commission shorten the deadline for comments concerning this filing to seven days, *i.e.*, September 17, 2021. This will help to facilitate an expedited Commission action on this filing, which will provide much needed market certainty on the upcoming BRA and associated pre-auction deadlines.

IV. DOCUMENTS ENCLOSED

PJM encloses the following in support of this filing:

1. This transmittal letter;
2. Attachment A: Pre-auction deadlines associated with the 2023/2024 Base Residual Auction;
3. Attachment B: Updated RPM Auction Schedule through the 2026/2027 Delivery Year; and

4. Attachment C: RPM Pre-Auction Deadlines for the 2024/2025 through 2026/2027 Delivery Years.

V. COMMUNICATIONS

Correspondence and communications with respect to this filing should be sent to the following persons:

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VI. SERVICE

PJM has served a copy of this filing on all PJM Members and on the affected state utility regulatory commissions in the PJM Region by posting this filing electronically. In accordance with the Commission's regulations,²² PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <http://www.pjm.com/documents/ferc-manuals/ferc-filings.aspx> with a specific link to the newly-filed document, and will send an e-mail on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region²³ alerting them that this filing has been made by PJM and is available by following such link. If the document is not immediately available by using the referenced link, the document will be available through the referenced link within 24 hours of the filing.

Also, a copy of this filing will be available on the Commission's eLibrary website

²² See 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).

²³ PJM already maintains, updates, and regularly uses e-mail lists for all PJM Members and affected state commissions.

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located at the following link: <http://www.ferc.gov/docs-filing/elibrary.aspx> in accordance with the Commission's regulations and Order No. 714.²⁴

VII. CONCLUSION

For the reasons set forth above, PJM respectfully requests that the Commission expeditiously accept this compliance filing and grant the requested waiver to delay the upcoming 2023/2024 BRA so that the auction window will open on January 25, 2022.

Respectfully submitted,



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²⁴ *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270 (2008), *final rule*, Order No. 714-A, 147 FERC ¶ 61,115 (2014).

Attachment A

Pre-Auction Deadlines Associated with 2023/2024 Base Residual Auction

Activities highlighted with an orange tab on the left side of each row (and in blue font) are those that are proposed to be changed as a result of this filing while deadlines corresponding to activities in black are existing deadlines that should remain the same.

Activity Type	Activity	Current Dates	Proposed Dates	Tariff Source
MOPR	PJM posts preliminary MOPR screen prices	7/4/21, Sun	7/4/21, Sun	OATT DD 5.14
Winter CIRs	PJM solicits requests for Winter CIRs	7/9/21, Fri	7/9/21, Fri	OATT IV Preamble
Demand Resource	PJM posts the Zones and sub-Zones, if any, for which end-use customer site-specific information shall be required for DR sell offers under the conditions specified in RAA Schedule 6 subsection A-1(1)(c)(iv).	7/19/21, Mon	7/19/21, Mon	OATT DD-1
PSA	Last day for Seller Peak-Shaving Adjustment Plans	7/19/21, Mon	7/19/21, Mon	OATT DD-2
Winter CIRs	Last day for Seller request for Winter CIRs	7/19/21, Mon	7/19/21, Mon	OATT IV Preamble
FRR	Last day for first time election of FRR Alternative starting with DY due	8/2/21, Mon	8/2/21, Mon	RAA Schedule 8.1.C
MOPR	Last day for a Capacity Market Seller to certify whether or not each Generation Resource qualifies as a Capacity Resource with State Subsidy	8/3/21, Tue	8/3/21, Tue	OATT DD 5.14
MOPR	Last day for Capacity Market Seller resource-specific MOPR exception request	8/3/21, Tue	8/3/21, Tue	OATT DD 5.14
EFORd	Last day for Capacity Market Sellers to submit request for alternate max EFORd	8/3/21, Tue	8/3/21, Tue	OATT 6.6
PRD	Last day to submit PRD Plan for BRA	8/6/21, Fri	8/6/21, Fri	OATT 6.6
Planning Parameters	Post Planning Parameters	8/23/21, Mon	8/23/21, Mon	M18; OATT DD 15
MOPR	IMM provides participant with determination on resource-specific MOPR exception request	9/2/21, Thu	9/2/21, Thu	OATT M – Appendix
EFORd	IMM provides participant with determination on alternate max EFORd request	9/2/21, Thu	9/2/21, Thu	OATT M – Appendix

Activity Type	Activity	Current Dates	Proposed Dates	Tariff Source
EFORd	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination of alternate max EFORd	9/12/21, Sun	9/12/21, Sun	OATT DD 5.14 & 6.6
Must Offer	Last day for Capacity Market Sellers to request must-offer exception for the reason specified under OATT Attachment M-Appendix § II.C.4.A	7/19/21, Mon	10/1/21, Fri	OATT DD 6.6
Sell Offer Caps	Last day for Capacity Market Sellers to submit sell offer cap data	8/3/21, Tue	10/1/21, Fri	OATT 6.6
Must Offer	Last day for Capacity Market Sellers to request must-offer exception for any reason other than the reason specified under OATT Attachment M-Appendix § II.C.4.A	8/3/21, Tue	8/3/21, Tue	OATT 6.6
MOPR	PJM notifies participant/IMM with determination on resource-specific MOPR exception request	9/27/21, Mon	9/27/21, Mon	OATT DD 5.14
EFORd	PJM notifies participant/IMM of determination on alternate max EFORd	9/27/21, Mon	9/27/21, Mon	OATT DD 5.14 & 6.6
Must Offer	PJM notifies participant/IMM of its determination on must offer exception for any reason other than the reason specified under OATT Attachment M-Appendix § II.C.4.A	9/27/21, Mon	9/27/21, Mon	OATT DD 5.14 & 6.6
FRR	Last day for FRR termination of election	10/1/21, Fri	10/1/21, Fri	RAA Schedule 8.1.C
MOPR	Participant provides commitment on MOPR price to be used	10/2/21, Sat	10/2/21, Sat	OATT DD 5.14
Sell Offer Caps	IMM provides participant with determination of offer cap	9/2/21, Thu	10/31/21, Sun	OATT M – Appendix
Must Offer	IMM provides participant with determination on must offer exception	9/2/21, Thu	10/31/21, Sun	OATT M – Appendix
Sell Offer Caps	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination of offer cap	9/12/21, Sun	11/5/21, Fri	OATT DD 5.14 & 6.6
Must Offer	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination on must offer exception	9/12/21, Sun	11/5/21, Fri	OATT DD 5.14 & 6.6
FRR	Last day for DR Plan Template and Officer Certification for FRR Capacity Plan	10/13/21, Wed	10/13/21, Wed	OATT DD-1
ICTR/QTU	Last day for ICTR/QTU Certification of Increase in Import Capability due	10/17/21, Sun	10/17/21, Sun	OATT DD 5.6.4
Sell Offer Caps	PJM notifies participant/IMM of determination on proposed offer cap	9/27/21, Mon	11/25/21, Thu	OATT DD 5.14 & 6.6
Must Offer	PJM notifies participant/IMM of its determination on must offer exception for the reason specified under OATT Attachment M-Appendix § II.C.4.A	9/27/21, Mon	11/25/21, Thu	OATT DD 6.6

Activity Type	Activity	Current Dates	Proposed Dates	Tariff Source
Must Offer	Last day for Capacity Market Sellers to notify PJM/IMM whether it intends to exclude from its Sell Offer some or all capacity from its generation resource on the basis of an identified exception to the RPM Must Offer Obligation	9/27/21, Mon	11/25/21, Thu	OATT DD 6.6
MOPR	Last day for Capacity Market Seller to certify that they elect to forego receiving any State Subsidy for the applicable delivery year by electing the competitive exemption	11/1/21, Mon	11/1/21, Mon	OATT DD 5.14
FRR	Last day for submission of FRR Capacity Plan due	11/1/21, Mon	11/1/21, Mon	RAA Schedule 8.1.C
Energy Efficiency	Last day for Initial/Updated EE M&V Plan Due for RPM	11/1/21, Mon	11/1/21, Mon	OATT DD-1
Demand Resource	Last day for DR Sell Offer Plan and Officer Certification Required	11/1/21, Mon	11/1/21, Mon	OATT DD-1
Auction	Auction window opens	12/1/21, Wed	1/25/22, Tue	
Auction	Auction window closes	12/7/21, Tue	1/31/22, Mon	
Auction	Auction results posted	12/14/21, Tue	2/7/22, Mon	

Attachment B

Updated RPM Auction Schedule Through the 2026/2027 Delivery Years

		AUCTION OPENING DATE	
		Current	Proposed
Auction	2023/24 BRA	Dec. 1, 2021, Wed	Jan. 25, 2022, Tue
	2022/23 Third IA	Feb.28, 2022, Mon	Feb. 28, 2022, Mon
	2024/25 BRA	June 15, 2022, Wed	Aug. 9, 2022, Tue
	2025/26 BRA	Jan. 4, 2023, Wed	Feb. 28, 2023, Tue
	2023/24 Third IA	Feb. 27, 2023, Mon	March 21, 2023, Tue
	2026/27 BRA	May 17, 2023, Wed	Aug. 29, 2023, Tue
	2024/25 Second IA	July 31, 2023, Mon	July 31, 2023, Mon
	2024/25 Third IA	Feb. 26, 2024, Mon	Feb. 26, 2024, Mon
	2025/26 Second IA	July 15, 2024, Mon	July 15, 2024, Mon
	2026/27 First IA	Sept. 9, 2024, Mon	Sept. 9, 2024, Mon
	2025/26 Third IA	Feb. 24, 2025, Mon	Feb. 24, 2025, Mon
	2026/27 Second IA	July 14, 2025, Mon	July, 14, 2025, Mon
	2026/27 Third IA	Feb. 23, 2026, Mon	Feb. 23, 2026, Mon

■ Proposed date changes

Attachment C
RPM Pre-Auction Deadlines
For the 2024/2025 through 2026/2027 Delivery Years

“Adjusted Days Prior” refer to PJM’s requested modified deadline for the corresponding activity prior to the relevant BRA.
“Deadline” refers to the current Tariff imposed deadlines for the corresponding activity.

<i>Base Residual Auctions</i>			2024/2025, 2025/2026, and 2026/2027 Delivery Years
Actor	Pre-Auction Task or Activity	Deadline, with Tariff Source	<u>Adjusted Days Prior</u>
PJM	PJM solicits requests for Winter CIRs	Aug. 31 of each calendar year (OATT IV Preamble)	145
Seller	Seller Final Must-Offer exception request (Deactivation)	Dec. 1 prior to BRA (OATT DD 6.6)	135
PJM	PJM posts DR Zones of Concern	Dec. 1 prior to BRA (OATT DD-1)	135
Seller	Seller Preliminary Must-Offer exception request (Deactivation)	Sept. 1 prior to BRA (OATT DD 6.6)	waived
Seller	Seller request for Winter CIRs	Oct. 31 prior to BRA (OATT IV Preamble)	135
Seller	Seller State Subsidy Certification	120 days prior to BRA (OATT DD 5.14)	120
PJM	Post Preliminary MOPR Screen Prices	150 days prior to auction (OATT DD 5.14)	150
FRR Entity	FRR first-time election	4 months prior to BRA (RAA Schedule 8.1.C)	121
Seller	Seller unit-specific MOPR request & Self-Supply Exemption	120 days prior to BRA (OATT DD 5.14)	120
Seller	Seller unit-specific request (Must-Offer, Offer Cap, EFORd)	120 days prior to auction (OATT 6.6)	120
Seller	Seller PRD Plan	Jan. 15 prior to BRA (RAA Schedule 6.1)	117
PJM	PJM posts Planning Parameters	Feb. 1 prior to BRA (M18; OATT DD 15)	100

<i>Base Residual Auctions</i>			2024/2025, 2025/2026, and 2026/2027 Delivery Years
Actor	Pre-Auction Task or Activity	Deadline, with Tariff Source	<u>Adjusted Days Prior</u>
Market Monitor	Market Monitor Determination (MOPR)	90 days prior to auction (OATT M – Appendix)	90
Market Monitor	Market Monitor Determination (Must-Offer, Offer Cap, EFORd)	90 days prior to auction (OATT M – Appendix)	90
Seller	Seller Notification to PJM (Must-Offer, Offer Cap, EFORd)	80 days prior to auction (OATT DD 5.14 & 6.6)	80
PJM	PJM Determination (MOPR & Self-Supply Exemption)	65 days prior to auction (OATT DD 5.14)	65
PJM	PJM Determination (Must-Offer, Offer Cap, EFORd)	65 days prior to auction (OATT DD 5.14 & 6.6)	65
Seller	Seller Notification of intent to exclude Must-Offer Exception MW	65 days prior to auction (OATT DD 6.6)	65
FRR Entity	FRR termination of election	2 months prior to BRA (RAA Schedule 8.1.C)	61
Seller	Seller Confirmation of MOPR price	60 days prior to auction (OATT DD 5.14)	60
FRR Entity	FRR DR Plan	15 business days prior to FRR Plan (OATT DD-1)	49
Seller	Seller needs ICTR/QTU certification of CETL increase	45 days prior to BRA (OATT DD 5.6.4)	45
Seller	Seller election to forgo State Subsidy (Competitive Exemption)	30 days prior to auction (OATT DD 5.14)	30

<i>Base Residual Auctions</i>			2024/2025, 2025/2026, and 2026/2027 Delivery Years
Actor	Pre-Auction Task or Activity	Deadline, with Tariff Source	<u>Adjusted Days</u> <u>Prior</u>
FRR Entity	FRR Capacity Plan	1 month prior to BRA (RAA Schedule 8.1.C)	30
Seller	Seller Energy Efficiency Plan	30 days prior to auction (OATT DD-1)	30
Seller	Seller DR Plan	15 business days prior to auction (OATT DD-1)	30

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Audubon, PA, this 10th day of September 2021.

/s/ Chenchao Lu
Chenchao Lu