

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

PJM Interconnection, L.L.C.

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**Docket Nos. EL19-58-009
ER19-1486-00__
(Consolidated)**

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

In compliance with the December 22, 2021 Order on Voluntary Remand of the Federal Energy Regulatory Commission (“Commission”) in the above referenced proceeding,¹ PJM Interconnection, L.L.C. (“PJM”) hereby submits this compliance filing to propose a new schedule for RPM Auctions and associated pre-auction deadlines through the 2026/2027 Delivery Years.² The revised auction schedule proposed herein will delay the upcoming RPM Auctions by approximately four and a half months to accommodate the change back to a historical energy and ancillary service offset used in calculating certain capacity offers. This proposed schedule will allow PJM to ultimately return to the normal three year forward Base Residual Auction (“BRA”) associated with the 2027/2028 Delivery Year. Given that the proposed timelines are condensed with the first pre-auction deadline associated with the 2023/2024 BRA set to February 1, 2022, PJM is also seeking a shortened comment period and

¹ *PJM Interconnection, L.L.C.*, 177 FERC ¶ 61,209 (2021) (“December 22 Order”).

² For the purpose of this filing, capitalized terms not defined herein shall have the meaning as contained in the PJM Open Access Transmission Tariff, Amended and Restated Operating Agreement of PJM Interconnection, L.L.C., or the Reliability Assurance Agreement Among Load Serving Entities in the PJM Region.

expedited consideration of this compliance filing so that the Commission can promptly issue an order and provide much needed market certainty on the timing of the pre-auction deadlines and upcoming BRA date.³

I. SATISFACTION OF THE COMPLIANCE REQUIREMENTS OF THE DECEMBER 22 ORDER.

A. PJM Proposes Revised Pre-Auction Timelines and a Revised Base Residual Auction Date for the 2023/2024 Delivery Year.

In accordance with the Commission’s December 22 Order, PJM submits this compliance filing to propose revised deadlines for certain pre-auction activities associated with the 2023/2024 BRA. In particular, PJM is proposing new deadlines for pre-auction activities for the 2023/2024 BRA that are impacted by the use of a historical energy and ancillary services offset (“E&AS Offset”) and the general delay of the BRA necessitating the need to utilize an updated load forecast.⁴ The revised deadlines, as shown in Attachment A of this filing, will provide Capacity Market Sellers and FRR Entities sufficient time to prepare and submit any required information for pre-auction activities that are impacted by the delay. Ultimately, the proposed revised timelines result in the commencement of the 2023/2024 BRA to be delayed until June 8, 2022.

1. PJM Proposes to Revise Deadlines Associated with Pre-Auction Activities that are Impacted by the Required Use of a Historical E&AS Offset.

PJM proposes to revise the pre-auction deadlines for activities that are directly impacted by the Commission required change from the forward-looking E&AS Offset to the historic

³ To effectuate the condensed timelines as proposed in this filing and ensure that the 2023/2024 BRA can commence on June 8, 2022, PJM will initiate the pre-auction activities associated with the 2023/2024 BRA consistent with the proposed deadlines herein. Any and all activities that are initiated before a Commission order on this compliance filing will be contingent upon Commission acceptance of this filing.

⁴ See Tariff, Attachment DD, section 5.10(d).

E&AS Offset. These activities include, among others, reposting the default Minimum Offer Floor Prices (“MOPR”) and offer caps, revised deadlines for Capacity Market Sellers to request unit-specific offers, and the corresponding deadlines for PJM and the Market Monitoring Unit to review such unit-specific requests. Attachment A of this filing provides revised pre-auction deadlines for the 2023/2024 BRA to accommodate such activities. Given that only the E&AS Offset portion of the MOPR and offer cap values are impacted by the December 22 Order to utilize a historical looking E&AS Offset, PJM intends to allow and expects that Capacity Market Sellers who previously requested a unit-specific offer cap to retain the gross cost values previously submitted by Capacity Market Sellers and already reviewed by PJM and the Market Monitoring Unit. In other words, Capacity Market Sellers may simply update the E&AS Offset portion of the unit-specific requests to avoid duplication of previously submitted supporting documentation for the gross cost. This approach will allow for administrative efficiencies by not requiring duplicative information to be resubmitted and ultimately save some time to allow PJM to conduct the upcoming 2023/2024 BRA without unnecessary delay.

2. PJM Also Proposes to Revise Deadlines Associated with Pre-Auction Activities that are Impacted by the Required Use of an Updated Load Forecast and General Delay of the Auction.

Because of the delay to pre-auction activities directly impacted by the change in the E&AS Offset, PJM also proposes to revise the deadlines for certain other pre-auction activities that are impacted by the delay of the upcoming 2023/2024 BRA. Specifically, since the BRA is now proposed to commence on June 8, 2022, PJM intends to utilize the most recently updated load forecast in the planning parameters as required by the Tariff.⁵ The use of an updated load forecast will require the elimination of one additional Energy Efficiency installation period (total

⁵ See Tariff, Attachment DD, section 5.10(d).

of two periods eliminated for the 2023/2024 Delivery Year) as they are already reflected in the updated load forecast. This is because the time period of an Energy Efficiency installation and the date of the peak load forecast used to develop the parameters for an RPM Auction determine whether an installation is eligible to participate as a Capacity Resource in a particular RPM Auction.⁶ In addition, the updated load forecast will also require FRR Plans to be revised and resubmitted because of adjustments to the load requirements.

Finally, additional resources that previously may not have qualified to participate in the 2023/2024 BRA may now be offered into the upcoming auction because of the delayed timeline. To accommodate these new resources, PJM proposes to reopen MOPR related pre-auction activities. This will allow Capacity Market Sellers that did not already certify whether they intend to exercise Buyer Side Market Power or will receive Conditioned State Support will be able to do so in advance of the upcoming BRA. Likewise, the deadline for PJM and the Market Monitoring Unit to notify Capacity Market Sellers of further inquiry into the potential exercise of Buyer Side Market Power will also need to be updated so that previously ineligible resources that participate in the 2023/2024 BRA will also be screened for potential Buyer Side Market Power.

As shown in Attachment A, the revised pre-auction deadlines for activities impacted by the E&AS Offset and load forecast update generally provides the same amount of time for Capacity Market Sellers, PJM, and the Market Monitoring Unit to complete the respective tasks.

⁶ See PJM, *Manual 18B: Energy Efficiency Measurement & Verification*, § 1.2 (rev. 4, Aug. 22, 2019), <https://pjm.com/~media/documents/manuals/m18b.ashx>.

3. *PJM Proposes to Retain Deadlines Associated with Pre-Auction Activities that are Not Impacted by the Change to the E&AS Offset or Updated Load Forecast.*

PJM proposes to retain the deadlines for other pre-auction activities that are unrelated to the change in the E&AS Offset or general delay of the auction. The retention of pre-auction timelines that are not impacted by the use of a historical E&AS Offset and the general delay of the auction will allow for a condensed schedule so that the upcoming BRA can be conducted on June 8, 2022.⁷

Notably, PJM received and considered some stakeholder feedback to reopen the deadlines associated with submissions of Energy Efficiency and Demand Resource plans.⁸ However, while the Tariff deadlines for these activities are typically three years in advance (i.e., 30 days prior to the BRA),⁹ they have already been reduced down to approximately one and a half years for the 2023/2024 BRA given the previous delay of the auction. As a result, Market Participants already have had the opportunity to update their Energy Efficiency and Demand Resource plans for the 2023/2024 Delivery Year so it is not necessary to reopen those activities again and further update previously submitted plans at this juncture. This is reasonable given that none of the recent Commission orders impact any of the rules associated with the participation of Demand Resources and Energy Efficiency Resources. In addition, reopening the deadline for submission of Demand Resource Plans would require all Curtailment Service Providers to resubmit their plans and associated officer certifications because a change in one

⁷ The existing Tariff imposed deadlines would also continue to apply to the extent any pre-auction activity is omitted from Attachment A.

⁸ Energy Efficiency and Demand Resource Plans represent the maximum amount of MWs that may be offered into the RPM Auctions. Typically, however, Market Participants do not offer the full amount of MWs in the approved Energy Efficiency and Demand Resource Plans.

⁹ PJM notes that there are additional administrative deadlines for submitting pre-registrations up to 60 days prior to the BRA for Energy Efficiency and Demand Resource plans.

Demand Resource Plan may impact what may be included in another Curtailment Service Provider's plan. Such an outcome could be disruptive to the orderly administration of the upcoming BRA as all Curtailment Service Providers would have to resubmit Demand Resource Plans even if they did not plan to do so. More importantly, reopening these activities now could open the door for amending deadlines related to other pre-auction activities that are also not impacted by the recent Commission orders. Such an outcome may ultimately require a further delay of the next BRA beyond June 8, 2022 – one that should not be delayed any further given the proximity to the actual Delivery Year.

Because this new auction schedule would mean the 2023/2024 BRA will be held less than one year from the start of the actual Delivery Year, PJM intends to commence the relevant pre-auction activities based on the revised timelines proposed in this filing without waiting for a Commission order on this compliance filing. This will provide sufficient time for Capacity Market Sellers, PJM, and the Market Monitoring Unit to complete all necessary pre-auction activities in advance of the 2023/2024 BRA on June 8, 2022 without further delay.¹⁰ Notwithstanding, PJM urges the Commission to expeditiously accept the revised auction schedule since any pre-auction activities that are completed in the interim are contingent upon the Commission accepting the proposed revised timelines.

¹⁰ PJM interprets the Commission's December 22 Order as requiring the use of a backward looking E&AS Offset commencing with the 2023/2024 Base Residual Auction. As a result, PJM intends to conduct the Third Incremental Auction for the 2022/2023 Delivery Year, which is scheduled to commence in February 2022, under the existing forward-looking E&AS Offset. Updating the E&AS Offset for the Third Incremental Auction for the 2022/2023 Delivery Year would be unreasonable since the BRA was already conducted using a forward looking E&AS Offset. Moreover, requiring Capacity Market Sellers to resubmit unit-specific requests to incorporate a backward looking E&AS Offset would simply not be feasible at this juncture given that there would not be enough time to further delay the February 2022 Third Incremental Auction in time before the start of the June 1, 2022 Delivery Year.

4. PJM Proposes to Provide Additional Clarity on Deadlines for Posting Net Energy and Ancillary Service Offsets

To provide further certainty and avoid potential disputes that may arise with updates to the calculated E&AS Offset, PJM proposes to include additional clarity on timelines for the Market Monitoring Unit to post unit-specific E&AS Offsets. Specifically, PJM is proposing that the Market Monitoring Unit post preliminary E&AS Offset values by January 27, 2022, while posting final E&AS Offset values by February 4, 2022.¹¹ Notwithstanding, PJM proposes to allow the Market Monitoring Unit and Capacity Market Seller to use an updated unit-specific E&AS value upon mutual agreement so long as that update is prior to the existing Tariff deadline for the Market Monitor Unit to calculate PJM Market Revenues (*i.e.*, 90 days prior to the auction).¹² This approach will ensure that Capacity Market Sellers can rely on the posted E&AS values in determining whether to prepare and submit a unit-specific offer cap request. At the same time, if a relevant Capacity Market Seller and the Market Monitoring Unit mutually agree to update the unit-specific E&AS Offset value that is calculated in accordance with the methodology detailed in the Tariff, they can still do so up to 90 days prior to the conduct of the relevant RPM Auction.

B. PJM Proposes Revised Base Residual Auction and Incremental Auction Dates Through the 2026/2027 Delivery Years.

Given that the commencement date for the 2023/2024 BRA is now proposed to be delayed until June 8, 2022, PJM is also proposing to delay subsequent BRAs through the

¹¹ These dates are proposed for the 2023/2024 BRA as shown in Attachment A. For the 2024/2025 through 2026/2027 BRA, PJM proposes that the Market Monitoring Unit post preliminary and final unit-specific E&AS Offset values no later than 150 and 135 days, respectively, prior to the RPM Auctions for those Delivery Years as shown in Attachment C.

¹² See Tariff, Attachment M-Appendix, section I.

2026/2027 Delivery Year.¹³ This proposed schedule will continue to allow for a compressed pre-auction timeline while also providing a reasonable amount of time for Market Participants to assess the BRA results before preparing for subsequent BRAs. Attachment B of this filing lists the revised auction schedules for the subsequent RPM Auctions through the 2026/2027 Delivery Year.

The delay in the BRAs through the 2026/2027 Delivery Year also require updates to the Incremental Auction schedule for the impacted Delivery Years. The updates include delaying the corresponding Incremental Auctions as well as eliminating certain additional Incremental Auctions through the 2026/2027 Delivery Year. In canceling additional Incremental Auctions, PJM proposes to utilize the same guiding principles for canceling Incremental Auctions that were previously proposed in 2020.¹⁴ Specifically, those principles (1) eliminate Incremental Auctions whose normally scheduled dates have already passed, (2) eliminate Incremental Auctions that fall within 10 months of the associated BRA, and (3) maintain all Third Incremental Auctions for each Delivery Year. Consistent with these considerations, PJM proposes to cancel the Second Incremental Auctions associated with the 2023/2024 through 2025/2026 Delivery Years, as well as the First Incremental Auction associated with the 2023/2024 through 2026/2027 Delivery Year as shown in the table below and in Attachment B of this filing.

¹³ PJM Compliance Filing Concerning Minimum Offer Price Rule, Request for Waiver of RPM Auction Deadlines, and Request for an Extended Comment Period of at Least 35 Days, at 84-85 and 91, Docket No. ER18-1314-003 (Mar. 18, 2020) (“March 2020 Compliance Filing”)

¹⁴ See March 2020 Compliance Filing, at 88-89.

Delivery Year	Current BRA Schedule	Draft Revised BRA Schedule	IAs Cancelled
2023/24	Jan 2022	Jun 2022	1 st and 2 nd
2024/25	Aug 2022	Dec 2022	1 st and 2 nd
2025/26	Feb 2023	June 2023	1 st and 2 nd
2026/27	Aug 2023	Nov 2023	1 st
2027/28 (back on schedule)	May 2024	May 2024	

To avoid the need to seek potential future waivers for unforeseen circumstances that may necessitate slight changes to the auction dates in the future, PJM is proposing only the month and year of the impacted auctions and not the specific date of the auction in this filing. This will provide some flexibility for PJM to make minor adjustments to the actual auction date as necessary. In fact, this approach is consistent with the existing Tariff requirement that only specifies the BRA must be held in the month of May without mandating a specific date.¹⁵ Consistent with prior practice, however, PJM would post the specific auction date and associated pre-auction timelines at least eight months before the commencement of the relevant RPM Auction.

C. PJM Proposes to Maintain the Pre-Auction Timelines Last Accepted by the Commission for RPM Auctions associated with the 2024/2025 Through the 2026/2027 Delivery Years.

While PJM is proposing revised pre-auction deadlines associated with the 2023/2024 BRA to further condense the timelines associated with the upcoming auction, PJM proposes to generally retain the pre-auction timelines for subsequent RPM Auctions consistent with those

¹⁵ See Tariff, Attachment DD, section 5.4(a).

that the Commission previously accepted.¹⁶ For clarity, Attachment C of this filing shows the pre-auction activities and associated timelines that PJM intends to follow for RPM Auctions through the 2026/2027 Delivery Year.

To promote administrative efficiencies, as part of this revised pre-auction schedule, PJM proposes to retain limited discretion of up to 10 business days to set the specific deadlines associated with any pre-auction activities. This is appropriate and reasonable given the numerous pre-auction activities and the fact that the associated deadlines may fall on a weekend or holiday where PJM, the Market Monitoring Unit, and Market Participants may not have staff available on the actual date of the pre-auction deadline. In such instances, PJM proposes limited discretion in adjusting the deadline as needed. It would be cumbersome and administratively inefficient to seek further amendments to the auction timelines for such minor adjustments to the deadlines. Of course, to ensure that all Market Participants are aware of the relevant deadlines, PJM intends to post the specific dates of pre-auction activities no later than eight months prior to the commencement of any associated RPM Auction.

II. MOTION FOR A SHORTENED COMMENT PERIOD AND EXPEDITED CONSIDERATION

Pursuant to Rule 212 of the Commission's Practice and Procedure,¹⁷ PJM respectfully requests that the Commission shorten the deadline for comments concerning this filing to seven days, *i.e.*, January 28, 2022. In addition, PJM requests expedited consideration of this filing to help to facilitate prompt Commission action on this filing, which will provide much needed market certainty on the upcoming BRA and associated pre-auction deadlines.

¹⁶ See *PJM Interconnection, L.L.C.*, 177 FERC ¶ 61,050 (2021).

¹⁷ 18 CFR § 385.212.

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

IV. COMMUNICATIONS

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

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V. SERVICE

PJM has served a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by posting this filing electronically. In accordance with the Commission's regulations, 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 Region 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 FERC's eLibrary website located at the following link: <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.

VI. CONCLUSION

For the reasons set forth above, PJM respectfully requests that the Commission expeditiously accept this compliance filing so that the next BRA auction window can open on June 8, 2022.

Respectfully submitted,



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Attachment A

Pre-Auction Deadlines Associated with 2023/2024 Base Residual Auction¹⁸

Activity Type	Activity	Previously Accepted Dates	Proposed Revised Dates	Tariff Source
Sell Offer Caps	Market Monitor posts preliminary unit-specific Energy and Ancillary Services Offset		1/27/22	Tariff, Attachment M - Appendix
MOPR	PJM posts preliminary MOPR screen prices	7/4/21	2/3/22	Tariff, Attachment DD 5.14
Sell Offer Caps	Market Monitor posts final unit-specific Energy and Ancillary Services Offset ¹⁹		2/4/22	Tariff, Attachment M - Appendix
Winter CIRs	PJM solicits requests for Winter CIRs	7/9/21	7/9/21	Tariff, 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	7/19/21	Tariff, Attachment DD-1
PSA	Last day for Sellers to submit Peak-Shaving Adjustment Plans	7/19/21	7/19/21	Tariff, Attachment DD-2
Winter CIRs	Last day for Seller request for Winter CIRs	7/19/21	7/19/21	Tariff IV Preamble

¹⁸ The existing Tariff imposed deadlines continue to apply to the extent any pre-auction activity is intentionally omitted from Attachment A.

¹⁹ PJM will accept a Sell Offer that may contain an Energy and Ancillary Services Offset that is revised after this deadline should the relevant Capacity Market Seller and the Market Monitor mutually agree to update this value after February 4, 2022. Notwithstanding, the ability to reach a mutually agreed to Energy and Ancillary Services Offset after the proposed February 4, 2022 deadline can only be exercised until March 10, 2022 (90 days prior to the proposed date of the upcoming Base Residual Auction as specified in Tariff, Attachment M-Appendix, section I).

Activity	Previously Accepted Dates	Proposed Revised Dates	Tariff Source
First day for first time election of FRR Alternative starting with DY due	8/2/21	8/2/21	RAA, Schedule 8.1.C
First 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	2/1/22	Tariff, Attachment DD 5.14
First day for PJM/IMM notification for inquiry of fact-specific reviews where buyer-side market power may be present		2/4/22	Tariff, Attachment DD 5.14
First day for Capacity Market Seller resource-specific MOPR exception request	8/3/21	2/8/22	Tariff, Attachment DD 5.14
First day for Capacity Market Sellers to submit request for alternate max EFORd	8/3/21	8/3/21	Tariff, Attachment 6.6
First day to submit PRD Plan for BRA	8/6/21	8/6/21	Tariff, Attachment 6.6
First day for Planning Parameters	8/23/21	2/28/22	M18; Tariff, Attachment DD 15
First day PJM provides participant with determination on resource-specific MOPR exception request	9/2/21	3/10/22	Tariff, Attachment M – Appendix
First day PJM provides participant with determination on alternate max EFORd request	9/2/21	9/2/21	Tariff, Attachment M – Appendix
First day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM termination of alternate max EFORd	9/12/21	9/12/21	Tariff, Attachment DD 5.14 & 6.6
First day for Capacity Market Sellers to request must-offer exception for the reason specified under Tariff, Attachment M-Appendix § II.C.4.A	10/1/21	2/8/22	Tariff, Attachment DD 6.6

Activity	Previously Accepted Dates	Proposed Revised Dates	Tariff Source
Latest day for Capacity Market Sellers to submit sell offer cap data	10/1/21	2/8/22 ²⁰	Tariff, Attachment 6.6
Latest 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	2/8/22	Tariff, Attachment 6.6
IMM notifies participant/IMM with determination on resource-specific MOPR exception request	9/27/21	4/4/22	Tariff, Attachment DD 5.14
IMM notifies participant/IMM of determination on alternate max EFORD	9/27/21	9/27/21	Tariff, Attachment DD 5.14 & 6.6
IMM notifies participant/IMM of its determination on must offer exception for any reason other than the reason specified under Tariff, Attachment M-Appendix § II.C.4.A	9/27/21	4/4/22	Tariff, Attachment DD 5.14 & 6.6
Latest day for FRR termination of election	10/1/21	10/1/21	RAA Schedule 8.1.C
Participant provides commitment on MOPR price to be used	10/2/21	4/9/22	Tariff, Attachment DD 5.14
IMM provides participant with determination of offer cap	10/31/21	3/10/22	Tariff, Attachment M – Appendix
IMM provides participant with determination on must offer exception	10/31/21	3/10/22	Tariff, Attachment M – Appendix
Latest day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM termination of offer cap	11/5/21	3/20/22	Tariff, Attachment DD 5.14 & 6.6

As revised deadline for Market Sellers to request a unit-specific offer cap, Market Sellers that previously submitted a unit-specific offer previously requested gross cost components of the unit-specific request and update only the energy and ancillary services data. This will

Activity Type	Activity	Previously Accepted Dates	Proposed Revised Dates	Tariff Source
Must Offer	Last day for Capacity Market Sellers to notify PJM/IMM of agreement with IMM determination on must offer exception	11/5/21	3/20/22	Tariff, Attachment DD 5.14 & 6.6
FRR	Last day for DR Plan Template and Officer Certification for FRR Capacity Plan	10/13/21	4/4/22	Tariff, Attachment DD-1
ICTR/QTU	Last day for ICTR/QTU Certification of Increase in Import Capability due	10/17/21	10/17/21	Tariff, Attachment DD 5.6.4
Sell Offer Caps	PJM notifies participant/IMM of determination on proposed offer cap	11/25/21	4/4/22	Tariff, Attachment DD 5.14 & 6.6
Must Offer	PJM notifies participant/IMM of its determination on must offer exception for the reason specified under Tariff, Attachment M-Appendix § II.C.4.A	11/25/21	4/4/22	Tariff, Attachment DD 6.6
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	11/25/21	4/4/22	Tariff, Attachment DD 6.6
FRR	Last day for submission of FRR Capacity Plan due	11/1/21	5/9/22	RAA, Schedule 8.1.C
Energy Efficiency	Last day for Initial/Updated EE M&V Plan Due for RPM	11/1/21	11/1/21	Tariff, Attachment DD-1
Demand Resource	Last day for DR Sell Offer Plan and Officer Certification Required	11/1/21	11/1/21	Tariff, Attachment DD-1
Auction	Auction window opens	1/25/22	6/8/22	
Auction	Auction window closes	1/31/22	6/14/22	
Auction	Auction results posted	2/7/22	6/21/22	

Attachment B

Updated RPM Auction Schedule Through the 2026/2027 Delivery Years

		Current	Proposed ²¹
Auction	2023/24 BRA	Jan. 25, 2022, Tue	June 8, 2022
	2022/23 Third IA	Feb. 28, 2022, Mon	Feb. 28, 2022
	2024/25 BRA	Aug. 9, 2022, Tue	December 2022
	2025/26 BRA	Feb. 28, 2023, Tue	June 2023
	2023/24 Third IA	March 21, 2023, Tue	March 2023
	2026/27 BRA	Aug. 29, 2023, Tue	November 2023
	2024/25 Second IA	July 31, 2023, Mon	Cancel (within 10 months from conduct of BRA)
	2024/25 Third IA	Feb. 26, 2024, Mon	Feb. 2024
	2025/26 Second IA	July 15, 2024, Mon	Cancel (within 10 months from conduct of BRA)
	2026/27 First IA	Sept. 9, 2024, Mon	Cancel (within 10 months from conduct of BRA)
	2025/26 Third IA	Feb. 24, 2025, Mon	Feb 2025
	2026/27 Second IA	July, 14, 2025, Mon	July 2025
	2026/27 Third IA	Feb. 23, 2026, Mon	Feb 2026

²¹ Rather than proposing specific dates, PJM is proposing to conduct the auctions during the relevant month listed above to allow for limited flexibility in the event of unforeseen circumstances that would require the auction date to be adjusted by a few days within the proposed month. PJM commits to posting on the PJM website the specific dates of the auction (and associated pre-auction activity deadlines) no later than eight months prior to the relevant auction.

Attachment C

RPM Pre-Auction Deadlines from the 2024/2025 through 2026/2027 Delivery Years

refer to PJM’s requested modified deadline for the corresponding activity prior to the relevant BRA.
the current Tariff imposed deadlines for the corresponding activity.

Action Task or Activity	Deadline, with Tariff Source	<u>Adjusted Days Prior</u>²²
Certification	150 days prior to BRA beginning with 2024/2025 BRA (Tariff, Attachment DD section 5.14)	150
Submits requests for Winter CIRs	Aug. 31 of each calendar year (Tariff, Attachment IV Preamble)	145
Final Must-Offer exception request (Deactivation)	Dec. 1 prior to BRA (Tariff, Attachment DD section 6.6)	135
Submits DR Zones of Concern	Dec. 1 prior to BRA (Tariff, Attachment DD-1)	135
Preliminary Must-Offer exception (Deactivation)	Sept. 1 prior to BRA (Tariff, Attachment DD, section 6.6)	waived
Request for Winter CIRs	Oct. 31 prior to BRA (Tariff, IV Preamble)	135
Submits Preliminary MOPR Screen and Market Monitor Posts and Preliminary Unit-Specific E&AS Offset	150 and 90 days, respectively, prior to auction (Tariff, Attachments DD section 5.14 and M-Appendix, section I.)	150

Action Task or Activity	Deadline, with Tariff Source	<u>Adjusted Days</u> <u>Prior</u>²²
Monitor Posts Final Unit-Specific Offset ²³	90 days prior to auction (Tariff, Attachment M-Appendix, section I.)	135
Real-time election	4 months prior to BRA (RAA, Schedule 8.1.C)	121
Unit-specific MOPR request	120 days prior to BRA (Tariff, Attachment DD section 5.14)	120
Unit-specific request (Must-Offer, Offer Cap, EFORd)	120 days prior to auction (Tariff, Attachment DD, section 6.6)	120
Submission of Price Responsive Demand	Jan. 15 prior to BRA (RAA, Schedule 6.1)	117
Establish Planning Parameters	Feb. 1 prior to BRA (M18; Tariff, Attachment DD, section 15)	100
Monitor Determination (MOPR)	90 days prior to auction (Tariff, Attachment M – Appendix)	90
Monitor Determination (Must-Offer Cap, EFORd)	90 days prior to auction (Tariff, Attachment M – Appendix)	90
Notification to PJM (Must-Offer, Offer Cap, EFORd)	80 days prior to auction (Tariff, Attachment DD, sections 5.14 & 6.6)	80
Termination (MOPR)	65 days prior to auction (Tariff, Attachment DD section 5.14)	65
Termination (Must-Offer, Offer Cap, EFORd)	65 days prior to auction (Tariff, Attachment DD sections 5.14 & 6.6)	65

²² Offer that may contain an Energy and Ancillary Services Offset that is revised after this deadline should the relevant Capacity Market participants mutually agree to an update value. Notwithstanding, the ability to reach a mutually agreed to Energy and Ancillary Services Offset

Actor	Pre-Auction Task or Activity	Deadline, with Tariff Source	<u>Adjusted Days Prior</u>²²
Seller	Seller Notification of intent to exclude Must-Offer Exception MW	65 days prior to auction (Tariff, Attachment DD section 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 (Tariff, Attachment DD section 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 (Tariff, Attachment DD section 5.6.4)	45
FRR Entity	FRR Capacity Plan	1 month prior to BRA (RAA, Schedule 8.1.C)	30
Seller	Submission of Energy Efficiency Plan	30 days prior to auction (Tariff, Attachment DD-1)	30
Seller	Submission of Demand Resource Plan	30 business days prior to auction (Tariff, Attachment 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 21st day of January 2022.

/s/ Chenchao Lu
Chenchao Lu