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October 3, 2025

The Honorable Debbie-Anne A. Reese  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E. Room 1A  
Washington, D.C. 20426

**Re: *PJM Interconnection L.L.C., Docket No. ER25-1073-001***  
***Order No. 904 Compliance Filing of PJM Interconnection, L.L.C.***

Dear Secretary Reese,

In compliance with the Federal Energy Regulatory Commission's ("FERC" or the "Commission") August 4, 2025 Order<sup>1</sup> on PJM's Order No. 904<sup>2</sup> compliance filing, PJM Interconnection, L.L.C. ("PJM") hereby submits proposed revisions to the PJM Open Access Transmission Tariff ("Tariff").<sup>3</sup>

PJM respectfully requests an effective date of June 1, 2026 for the Tariff revisions proposed herein, to align with the effective date accepted by the Commission in the August 4, 2025 Order.<sup>4</sup>

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<sup>1</sup> *PJM Interconnection, L.L.C.*, 192 FERC ¶ 61,113 (2025) (hereafter, the "August 4, 2025 Order"). See Order Para. (B) ("PJM is hereby directed to submit a compliance filing that addresses the directives in this order within 60 days of the date of this order, as discussed in the body of this order.").

<sup>2</sup> *Compensation for Reactive Power Within the Standard Power Factor Range*, 189 FERC ¶ 61,034 (2024) ("Order No. 904").

<sup>3</sup> The Tariff is currently located under PJM's "Intra-PJM Tariffs" eTariff title. *Tariff Browser, PJM Interconnection, L.L.C. – Intra-PJM Tariffs*, PJM Interconnection, L.L.C., <https://etariff.ferc.gov/TariffBrowser.aspx?tid=1731>. Terms not otherwise defined herein shall have the same meaning as set forth in the Tariff, the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. ("Operating Agreement"), and the Reliability Assurance Agreement among Load-Service Entities in the PJM Region ("RAA").

<sup>4</sup> August 4, 2025 Order at Order Para. (A) ("PJM's compliance filing is hereby accepted in part, effective June 1, 2026, subject to a further compliance filing, as discussed in the body of this order.").

## I. BACKGROUND

### A. *August 4, 2025 Order*

In the August 4, 2025 Order, the Commission found that “PJM’s filing complies with Order No. 904’s requirement to revise Schedule 2 of the Tariff to remove compensation for the provision of reactive power within the standard power factor range specified in the interconnection customer’s interconnection agreement,”<sup>5</sup> and that “PJM has justified delaying the elimination of reactive power compensation within the standard power factor range until June 1, 2026.”<sup>6</sup>

However, the Commission found PJM’s proposed “gating criteria” and requirements for “fleetwide rates” during the transition period to be beyond the scope of the compliance proceeding.<sup>7</sup> Accordingly, the Commission directed PJM to submit a further compliance filing that “removes the gating criteria and fleetwide rates Tariff language and supersedes the Tariff record accepted in this order within 60 days of the date of this order.”<sup>8</sup>

## II. PJM COMPLIANCE

In compliance with the Commission’s directives, PJM is submitting a superseding eTariff record that removes the gating criteria and fleetwide rates Tariff language in the following manner.

Reactive Supply and Voltage Control from Generation or Other Sources Service is to be provided directly by the Transmission Provider. The Transmission Customer must purchase this service from the Transmission Provider. However, except as otherwise provided for in this Tariff, Schedule 2, the Transmission Provider shall not include in any charges to any Transmission Customer any costs associated with the compensation to a generating facility for Reactive Supply and Voltage Control from Generation or Other Sources Service within the power factor range specified in its

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<sup>5</sup> *Id.* at P 15.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at PP 41-42.

<sup>8</sup> *Id.* at P 45.

Generation Interconnection Agreement or any other interconnection agreement, and shall not credit any Generation Owner or other source owner for such costs.

In addition to the charges and payments set forth in this Tariff, Schedule 2, Market Sellers providing reactive services at the direction of the Office of the Interconnection shall be credited for such services, and Market Participants shall be charged for such services, as set forth in Tariff, Attachment K-Appendix, section 3.2.3B.

The Transmission Provider shall administer the purchases and sales of Reactive Supply. PJMSettlement shall be the Counterparty to (a) the purchases of Reactive Supply from owners of Generation or Other Sources and Market Sellers and (b) the sales of Reactive Supply to Transmission Customers and Market Participants.

#### **Transition Mechanism**

The following provisions titled “Charges” and “Payment to Generation or Other Source Owners” shall apply only to a Generation Owner or other source owner that has an effective monthly revenue requirement for Reactive Supply and Voltage Control from Generation or Other Sources Service that has been accepted by the Commission before January 27, 2025, and owns a generator or other source encompassed by the effective monthly revenue requirement that: (i) the Transmission Provider determines is operationally capable of providing Reactive Supply and Voltage Control from Generation or Other Sources Service in a manner that can be relied on by the Transmission Provider to maintain transmission voltages within appropriate limits; (ii) has successfully interconnected to the Transmission Provider’s transmission facilities pursuant to an executed Generation Interconnection Agreement or any other executed interconnection agreement that has been accepted by the Commission; and (iii) obtains a capacity commitment from the Reliability Pricing Model Auctions for the 2025/2026 Delivery Year.

If an effective monthly revenue requirement for Reactive Supply and Voltage Control from Generation or Other Sources Service of a Generation Owner or other source owner applies to multiple generators or other sources, and one or more of such generators or other sources encompassed by that revenue requirement do not meet one or more of the above criteria, the Generation Owner or other source owner shall be ineligible to receive compensation for such revenue requirement under this section titled “Transition

~~Mechanism,” until the Commission accepts revisions to the applicable revenue requirement that remove the specific generators or other sources that do not meet all of the above criteria.~~

~~All provisions under this section titled “Transition Mechanism,” including the following provisions titled “Charges” and “Payment to Generation or Other Source Owners” shall cease to be effective in their entirety on June 1, 2026.~~

### **III. PROPOSED EFFECTIVE DATE**

PJM respectfully requests an effective date of June 1, 2026 for the Tariff revisions proposed herein, to align with the date accepted by the Commission in the August 4, 2025 Order.

### **IV. CORRESPONDENCE AND COMMUNICATIONS**

Please direct any communications regarding this filing to the following individuals:

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Suite 600  
Washington, D.C. 20005  
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Craig.Glazer@pjm.com

### **V. DOCUMENTS INCLUDED WITH THIS FILING**

In accordance with the requirements of Order No. 714<sup>9</sup> and the Commission’s eTariff regulations, PJM hereby submits an eTariff XML filing package consisting of the following materials:

1. This transmittal letter;
2. Attachment A – Revisions to the Tariff, effective June 1, 2026, in redlined format; and
3. Attachment B – Revisions to the Tariff, effective June 1, 2026, in clean format.

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<sup>9</sup> *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270 (2008), *final rule*, Order No. 714-A, 147 FERC ¶ 61,115 (2014).

## VI. 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,<sup>10</sup> PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link: <https://www.pjm.com/library/filing-order> 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<sup>11</sup> alerting them that this filing has been made by PJM today 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 located at the following link: <https://elibrary.ferc.gov/eLibrary/search> in accordance with the Commission's regulations and Order No. 714.

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<sup>10</sup> See 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).

<sup>11</sup> PJM already maintains, updates, and regularly uses e-mail lists for all PJM members and affected commissions.

## VII. CONCLUSION

In accordance with the foregoing, PJM respectfully requests that the Commission accept this submission and associated Tariff record as compliant with the August 4, 2025 Order.

Respectfully submitted,

Craig A. Glazer  
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/s/ Thomas DeVita  
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Thomas.DeVita@pjm.com

*On behalf of*  
*PJM Interconnection, L.L.C.*

October 3, 2025

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this 3rd day of October, 2025, caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Thomas DeVita

Thomas DeVita  
Associate General Counsel  
PJM Interconnection, L.L.C.

# Attachment A

## Revisions to the PJM Open Access Transmission Tariff

(Marked / Redline Format)



## SCHEDULE 2

### Reactive Supply and Voltage Control from Generation or Other Sources Service

In order to maintain transmission voltages on the Transmission Provider's transmission facilities within acceptable limits, generation facilities and non-generation resources capable of providing this service that are under the control of the control area operator are operated to produce (or absorb) reactive power. Thus, Reactive Supply and Voltage Control from Generation or Other Sources Service must be provided for each transaction on the Transmission Provider's transmission facilities. The amount of Reactive Supply and Voltage Control from Generation or Other Sources Service that must be supplied with respect to the Transmission Customer's transaction will be determined based on the reactive power support necessary to maintain transmission voltages within limits that are generally accepted in the region and consistently adhered to by the Transmission Provider.

Reactive Supply and Voltage Control from Generation or Other Sources Service is to be provided directly by the Transmission Provider. The Transmission Customer must purchase this service from the Transmission Provider. However, ~~except as otherwise provided for in this Tariff, Schedule 2,~~ the Transmission Provider shall not include in any charges to any Transmission Customer any costs associated with the compensation to a generating facility for Reactive Supply and Voltage Control from Generation or Other Sources Service within the power factor range specified in its Generation Interconnection Agreement or any other interconnection agreement, and shall not credit any Generation Owner or other source owner for such costs.

In addition to the charges and payments set forth in this Tariff, Schedule 2, Market Sellers providing reactive services at the direction of the Office of the Interconnection shall be credited for such services, and Market Participants shall be charged for such services, as set forth in Tariff, Attachment K-Appendix, section 3.2.3B.

The Transmission Provider shall administer the purchases and sales of Reactive Supply. PJMSettlement shall be the Counterparty to (a) the purchases of Reactive Supply from owners of Generation or Other Sources and Market Sellers and (b) the sales of Reactive Supply to Transmission Customers and Market Participants.

#### **Transition Mechanism**

~~The following provisions titled "Charges" and "Payment to Generation or Other Source Owners" shall apply only to a Generation Owner or other source owner that has an effective monthly revenue requirement for Reactive Supply and Voltage Control from Generation or Other Sources Service that has been accepted by the Commission before January 27, 2025, and owns a generator or other source encompassed by the effective monthly revenue requirement that: (i) the Transmission Provider determines is operationally capable of providing Reactive Supply and Voltage Control from Generation or Other Sources Service in a manner that can be relied on by the Transmission Provider to maintain transmission voltages within appropriate limits; (ii) has successfully interconnected to the Transmission Provider's transmission facilities pursuant to an~~

~~executed Generation Interconnection Agreement or any other executed interconnection agreement that has been accepted by the Commission; and (iii) obtains a capacity commitment from the Reliability Pricing Model Auctions for the 2025/2026 Delivery Year.~~

~~If an effective monthly revenue requirement for Reactive Supply and Voltage Control from Generation or Other Sources Service of a Generation Owner or other source owner applies to multiple generators or other sources, and one or more of such generators or other sources encompassed by that revenue requirement do not meet one or more of the above criteria, the Generation Owner or other source owner shall be ineligible to receive compensation for such revenue requirement under this section titled “Transition Mechanism,” until the Commission accepts revisions to the applicable revenue requirement that remove the specific generators or other sources that do not meet all of the above criteria.~~

~~All provisions under this section titled “Transition Mechanism,” including the following provisions titled “Charges” and “Payment to Generation or Other Source Owners” shall cease to be effective in their entirety on June 1, 2026.~~

## **Charges**

Purchasers of Reactive Supply and Voltage Control from Generation or Other Sources Service shall be charged for such service in accordance with the following formulae.

Monthly Charge for a purchaser receiving Network Integration Transmission Service or Point-to-Point Transmission Service to serve Non-Zone Load = Allocation Factor \* Total Generation Owner or other source owner Monthly Revenue Requirement

Monthly Charge for a purchaser receiving Network Integration Transmission Service or Point-to-Point Transmission Service to serve Zone Load = Allocation Factor \* Zonal Generation Owner or other source owner Monthly Revenue Requirement \* Adjustment Factor

Where:

Purchaser serving Non-Zone Load is a Network Customer serving Non-Zone Network Load or serving Network Load in a zone with no revenue requirement for Reactive Supply and Voltage Control from Generation or Other Sources Service, or a Transmission Customer where the Point of Delivery is at the boundary of the PJM Region.

Zonal Generation Owner or other source owner Monthly Revenue Requirement is the sum of the monthly revenue requirements for each generator or other source located in a Zone, as such revenue requirements have been accepted or approved, upon application, by the Commission.

Total Generation Owner or other source owner Monthly Revenue Requirement is the sum of the Zonal Generation or other source owner Monthly Revenue Requirements for all Zones in the PJM Region.

Allocation Factor is the monthly transmission use of each Network Customer or Transmission Customer per Zone or Non-Zone, as applicable, on a megawatt basis divided by the total transmission use in the Zone or in the PJM Region, as applicable, on a megawatt basis.

For Network Customers, monthly transmission use on a megawatt basis is the sum of a Network Customer's daily values of DCPZ or DCPNZ (as those terms are defined in Tariff, Part III, section 34.1) as applicable, for all days of the month.

For Transmission Customers, monthly transmission use on a megawatt basis is the sum of the Transmission Customer's hourly amounts of Reserved Capacity for each day of the month (not curtailed by PJM) divided by the number of hours in the day.

Adjustment Factor is determined as the sum of the total monthly transmission use in the PJM Region, exclusive of such use by Transmission Customers serving Non-Zone Load, divided by the total monthly transmission use in the PJM Region on a megawatt basis.

In the event that a single customer is serving load in more than one Zone, or serving Non-Zone Load as well as load in one or more Zones, or is both a Network Customer and a Transmission Customer, the Monthly Charge for such a customer shall be the sum of the Monthly Charges determined by applying the appropriate formulae set forth in this Schedule 2 for each category of service.

### **Payment to Generation or Other Source Owners**

Each month, the Transmission Provider shall pay each Generation Owner or other source owner an amount equal to the Generation Owner's or other source owner's monthly revenue requirement as accepted or approved by the Commission. In the event a Generation Owner or other source owner sells a generator or other source which is included in its current effective monthly revenue requirement accepted or approved by the Commission, payments in that Generation Owner's or other source owner's Zone may be allocated as agreed to by the owners of the generator or other source in that Zone. Such Generation Owner or other source owners shall inform the Transmission Provider of any such agreement and submit either a filing to revise its cost-based rate or an informational filing in accordance with the requirements below in this Schedule 2. In the absence of agreement among such Generation Owners or other source owners, the Commission, upon application, shall establish the allocation. Generation Owners shall not be eligible for payment, pursuant to this Schedule 2, of monthly revenue requirement associated with those portions of generating units designated as Behind The Meter Generation. The Transmission Provider shall post on its website a list for each Zone of the annual revenue

requirements for each Generation Owner receiving payment within such Zone and specify the total annual revenue requirement for all of the Transmission provider.

At least 90 days prior to the Deactivation Date or disposition date of a generator or other source receiving payment in accordance with a Commission accepted or approved revenue requirement for providing reactive supply and voltage control service under this Schedule 2, the Generation Owner or other source owner must either:

(1) submit to the Commission the appropriate filings to terminate or revise its cost-based revenue requirement for supplying reactive supply and voltage control service under this Schedule 2 to account for the deactivated or transferred generator or other source; or

(2) provide to the Transmission Provider and file with the Commission an informational filing that includes the following information:

- (i) the acquisition date, Deactivation Date, and transfer date of the generator or other source;
- (ii) an explanation of the basis for the decision by the Generation Owner or other source owner not to terminate or revise the cost-based rate approved or accepted by the Commission associated with the planned generator or other source deactivation or disposition;
- (iii) a list of all of the generators or other sources covered by the Generation Owner's or other source owner's cost-based tariff from the date the revenue requirement was first established until the date of the informational filing;
- (iv) the type (i.e., fuel type and prime mover) of each generator or other source;
- (v) the actual (site-rated) megavolt-ampere reactive ("MVAR") capability, megavolt-ampere ("MVA") capability, and megawatt capability of each generator or other source, as supported by test data; and
- (vi) the nameplate MVAR rating, nameplate MVA rating, nameplate megawatt rating, and nameplate power factor for each generator or other source.

The Generation Owner or other source owner must submit the informational filing in the docket in which its cost-based revenue requirement was approved or accepted by the Commission or as otherwise directed by the Commission.

The requirement to submit the filings at least 90 days prior to the Deactivation Date or disposition date of a generator or other source shall not apply to generators or other source deactivations or transfers occurring between June 18, 2015, and September 16, 2015. For generator or other source deactivations or transfers occurring between June 18, 2015, and September 16, 2015, the Generation Owner or other source owner shall submit the informational filing or filings to terminate or revise its cost-based revenue requirement by September 16, 2015.

# Attachment B

## Revisions to the PJM Open Access Transmission Tariff

(Clean Format)

## **SCHEDULE 2**

### **Reactive Supply and Voltage Control from Generation or Other Sources Service**

In order to maintain transmission voltages on the Transmission Provider's transmission facilities within acceptable limits, generation facilities and non-generation resources capable of providing this service that are under the control of the control area operator are operated to produce (or absorb) reactive power. Thus, Reactive Supply and Voltage Control from Generation or Other Sources Service must be provided for each transaction on the Transmission Provider's transmission facilities. The amount of Reactive Supply and Voltage Control from Generation or Other Sources Service that must be supplied with respect to the Transmission Customer's transaction will be determined based on the reactive power support necessary to maintain transmission voltages within limits that are generally accepted in the region and consistently adhered to by the Transmission Provider.

Reactive Supply and Voltage Control from Generation or Other Sources Service is to be provided directly by the Transmission Provider. The Transmission Customer must purchase this service from the Transmission Provider. However, the Transmission Provider shall not include in any charges to any Transmission Customer any costs associated with the compensation to a generating facility for Reactive Supply and Voltage Control from Generation or Other Sources Service within the power factor range specified in its Generation Interconnection Agreement or any other interconnection agreement, and shall not credit any Generation Owner or other source owner for such costs.

In addition to the charges and payments set forth in this Tariff, Schedule 2, Market Sellers providing reactive services at the direction of the Office of the Interconnection shall be credited for such services, and Market Participants shall be charged for such services, as set forth in Tariff, Attachment K-Appendix, section 3.2.3B.

The Transmission Provider shall administer the purchases and sales of Reactive Supply. PJMSettlement shall be the Counterparty to (a) the purchases of Reactive Supply from owners of Generation or Other Sources and Market Sellers and (b) the sales of Reactive Supply to Transmission Customers and Market Participants.

### **Charges**

Purchasers of Reactive Supply and Voltage Control from Generation or Other Sources Service shall be charged for such service in accordance with the following formulae.

Monthly Charge for a purchaser receiving Network Integration Transmission Service or Point-to-Point Transmission Service to serve Non-Zone Load = Allocation Factor \* Total Generation Owner or other source owner Monthly Revenue Requirement

Monthly Charge for a purchaser receiving Network Integration Transmission Service or Point-to-Point Transmission Service to serve Zone Load = Allocation Factor \* Zonal

Generation Owner or other source owner Monthly Revenue Requirement \* Adjustment Factor

Where:

Purchaser serving Non-Zone Load is a Network Customer serving Non-Zone Network Load or serving Network Load in a zone with no revenue requirement for Reactive Supply and Voltage Control from Generation or Other Sources Service, or a Transmission Customer where the Point of Delivery is at the boundary of the PJM Region.

Zonal Generation Owner or other source owner Monthly Revenue Requirement is the sum of the monthly revenue requirements for each generator or other source located in a Zone, as such revenue requirements have been accepted or approved, upon application, by the Commission.

Total Generation Owner or other source owner Monthly Revenue Requirement is the sum of the Zonal Generation or other source owner Monthly Revenue Requirements for all Zones in the PJM Region.

Allocation Factor is the monthly transmission use of each Network Customer or Transmission Customer per Zone or Non-Zone, as applicable, on a megawatt basis divided by the total transmission use in the Zone or in the PJM Region, as applicable, on a megawatt basis.

For Network Customers, monthly transmission use on a megawatt basis is the sum of a Network Customer's daily values of DCPZ or DCPNZ (as those terms are defined in Tariff, Part III, section 34.1) as applicable, for all days of the month.

For Transmission Customers, monthly transmission use on a megawatt basis is the sum of the Transmission Customer's hourly amounts of Reserved Capacity for each day of the month (not curtailed by PJM) divided by the number of hours in the day.

Adjustment Factor is determined as the sum of the total monthly transmission use in the PJM Region, exclusive of such use by Transmission Customers serving Non-Zone Load, divided by the total monthly transmission use in the PJM Region on a megawatt basis.

In the event that a single customer is serving load in more than one Zone, or serving Non-Zone Load as well as load in one or more Zones, or is both a Network Customer and a Transmission Customer, the Monthly Charge for such a customer shall be the sum of the Monthly Charges determined by applying the appropriate formulae set forth in this Schedule 2 for each category of service.

## **Payment to Generation or Other Source Owners**

Each month, the Transmission Provider shall pay each Generation Owner or other source owner an amount equal to the Generation Owner's or other source owner's monthly revenue requirement as accepted or approved by the Commission. In the event a Generation Owner or other source owner sells a generator or other source which is included in its current effective monthly revenue requirement accepted or approved by the Commission, payments in that Generation Owner's or other source owner's Zone may be allocated as agreed to by the owners of the generator or other source in that Zone. Such Generation Owner or other source owners shall inform the Transmission Provider of any such agreement and submit either a filing to revise its cost-based rate or an informational filing in accordance with the requirements below in this Schedule 2. In the absence of agreement among such Generation Owners or other source owners, the Commission, upon application, shall establish the allocation. Generation Owners shall not be eligible for payment, pursuant to this Schedule 2, of monthly revenue requirement associated with those portions of generating units designated as Behind The Meter Generation. The Transmission Provider shall post on its website a list for each Zone of the annual revenue requirements for each Generation Owner receiving payment within such Zone and specify the total annual revenue requirement for all of the Transmission provider.

At least 90 days prior to the Deactivation Date or disposition date of a generator or other source receiving payment in accordance with a Commission accepted or approved revenue requirement for providing reactive supply and voltage control service under this Schedule 2, the Generation Owner or other source owner must either:

(1) submit to the Commission the appropriate filings to terminate or revise its cost-based revenue requirement for supplying reactive supply and voltage control service under this Schedule 2 to account for the deactivated or transferred generator or other source; or

(2) provide to the Transmission Provider and file with the Commission an informational filing that includes the following information:

- (i) the acquisition date, Deactivation Date, and transfer date of the generator or other source;
- (ii) an explanation of the basis for the decision by the Generation Owner or other source owner not to terminate or revise the cost-based rate approved or accepted by the Commission associated with the planned generator or other source deactivation or disposition;
- (iii) a list of all of the generators or other sources covered by the Generation Owner's or other source owner's cost-based tariff from the date the revenue requirement was first established until the date of the informational filing;
- (iv) the type (i.e., fuel type and prime mover) of each generator or other source;
- (v) the actual (site-rated) megavolt-ampere reactive ("MVAR") capability, megavolt-ampere ("MVA") capability, and megawatt capability of each generator or other source, as supported by test data; and



- (vi) the nameplate MVAR rating, nameplate MVA rating, nameplate megawatt rating, and nameplate power factor for each generator or other source.

The Generation Owner or other source owner must submit the informational filing in the docket in which its cost-based revenue requirement was approved or accepted by the Commission or as otherwise directed by the Commission.

The requirement to submit the filings at least 90 days prior to the Deactivation Date or disposition date of a generator or other source shall not apply to generators or other source deactivations or transfers occurring between June 18, 2015, and September 16, 2015. For generator or other source deactivations or transfers occurring between June 18, 2015, and September 16, 2015, the Generation Owner or other source owner shall submit the informational filing or filings to terminate or revise its cost-based revenue requirement by September 16, 2015.