

Problem/Opportunity Statement

Copy PJM with Members' Governing Documents Filings

Problem / Opportunity Statement

PJM is responsible for the administration of the RTO Governing Documents but has experienced times when an initial filing is made by a Member that directly impacts the administration of the Governing Documents has been not provided to PJM (or its IMM). While FERC has rules regarding the service of a complaint, there are not clear rules with respect to other filings of concern. These include one or more of the following types of filings: reactive rate filings, reliability must run filings, other initial rate filings, market-based rate filings including triennial updates, third party rate schedule/service agreement filings impacting the PJM region, requests for waiver of any provision of the PJM Governing Agreements, and petitions of declaratory order interpreting the Governing Documents or other PJM requirements. Providing a copy of such initial filings to PJM is important to ensure PJM is able to timely intervene and participate in such proceedings to protect the interests of PJM and its Members. There is an opportunity to add requirements to provide PJM with a copy of such initial filings in PJM's Governing Documents and/or Manuals.