

## 8.6 Alternative Processes

*Stakeholder Process offers several alternative processes for non-standard situations and minority protections (detailed in Section 12.2). These alternatives include CBIR Lite, the Enhanced Liaison Committee, User Groups, and assignment of topics as special sessions of a committee.*

### 8.6.3 Critical Issue Fast Path (CIFP)

The purpose of the Critical Issues Fast Path process is to provide the PJM Board of Managers (Board) and PJM Members an orderly and facilitated process to directly discuss contentious issues with known PJM/FERC implementation deadlines that were not resolved or would be extremely difficult to resolve within the normal CBIR Stakeholder process. The CFIP process is to be used on major issues in extraordinary circumstances (broad impact to markets or significant reliability issue) and is expected to be used very infrequently.

#### Trigger(s) for Initiating (CIFP)

- Board initiated for time constrained major issues or existing work efforts that have not or are unlikely to achieve consensus, or
- New issue, with greater than 2/3 sector weighted MC vote on PS/IC in favor of sending a letter to the board requesting the CIFP process be initiated, or
- In-process stakeholder issue, at proposal development stage or later with greater than 2/3 sector weighted MC vote on PS/IC in favor of sending a letter to the board requesting the CIFP process be initiated

Reference: Exhibit 8, M34

#### General

It is envisioned that the CIFP process could be completed in as few as 5 consecutive days or take up to several months depending on the issue and necessary deadlines.

For stages 1, 2 and 3 - meeting times will be scheduled to cover the CIFP requirements to meet the decision deadline; multi-day meetings may be used to meeting decision deadlines.

The CIFP meeting can require cancellation/reschedule of any other stakeholder meetings including standing committees

#### CIFP Meeting Stages

Stage 1 – Similar to the normal CBIR process. PJM will provide stakeholder education and their initial solution package and alternatives considered including their option alternatives to stakeholders

Stage 2 - Stakeholders may discuss any considered and/or new alternatives with row by row reviews

Stage 3 – Based on the row by row discussions, PJM will finalize its package and stakeholders will create alternative packages as appropriate

Stage 4 – “Final Meeting” : PJM will review their package proposal row by row to show how their solution addresses the PS/IC for the benefit of all meeting attendees. At the conclusion of the PJM presentation, Members and noted non-Member stakeholders, whether individually or in self-selected coalitions, will provide feedback to the Board on the impacts, positive or negative on the details contained within the solution Matrix. As the issues and interests vary, deference has been afforded to the MC Chair, Vice Chair, and MC Secretary as the decision makers who will determine the allowable speaking times. Similar to an LC meeting, the purpose of the meeting to facilitate Member-Board communications. Therefore, the final meeting is not a regular stakeholder meeting and there will not be Member to Member points and counter points permitted.

#### Steps in the Process

1. For new CIFP issues, PJM will create PS & IC as informational to stakeholders and to set scope and deliverables. No MC approval vote is required.
2. Initial CIFP meeting – Presentation of an Option Matrix, pre-loaded with PJM package including all issue (row) alternatives considered by PJM noting the preferred option choices and why
3. PJM presents simulation results, review studies performed, and reviews forecasted market impacts as appropriate.
4. Stakeholders have opportunity to offer feedback, alternative ideas, request additional studies to be completed as time and manpower permit.
5. PJM will facilitate the CIFP process using the CBIR option/solution matrix. In addition, PJM may provide a whitepaper or briefing paper as needed.
6. Stakeholders do not have any requirement for developing a whitepaper. Stakeholders may add alternate options to the PJM's initial matrix that could lead to alternative solution packages. In addition to the normal values resulting from a CBIR solution matrix, the CIFP matrix has the additional purpose to enhance the Board's decision making regarding their solution package if stakeholder consensus is not achieved in an MC vote.

#### Roles and Responsibilities

1. PJM to create the initial CIFP matrix including all row options considered.
2. PJM will facilitate the first three meeting stages.
3. Stakeholders will be presented with the details of PJM decision making and focus on improving option solutions and noting key areas of support and/or concerns.
4. The PJM IMM is required to meet with PJM prior to Stage 1 meeting to build a consensus package if possible.
5. PJM Board will approve initiation of the CIFP process, establish objectives, establish CIFP deadlines, and solicit detailed Member feedback at the final CIPF.

#### Participation

- Early meetings, Stages 1 -3, Open to all stakeholders. Media permitted, but without individual attribution, PJM, states & IMM are permitted to attend
- PJM Board is required for the final (Step 4) CIPF and Members Committee meeting with two or more Board members in person consistent with MC protocols. Other Board members may participate by phone. The Board is encouraged to participate in Stages 1 -3 meetings as well.

#### Final Meeting Details

- Will be scheduled ideally on the morning of an existing MRC/MC meeting date.
- The meeting will be conducted similarly to a Liaison Committee in that the purpose of the meeting is to facilitate discussion between the Members and the Board. The CIPF meeting may last up to 4 hours of Member-Board conversation (including time limited comments from the IMM, invited non-Members and states)
- Speaker comments will focus on support or concerns with the package details as shown on the matrix
- Attendance
  - Open only to Members, IMM, States, PJM and invited non-Members may attend. Strict time limited presentations. In person only (no phone or video)
  - Media rules are the same as at Liaison Committee

#### Facilitation

- The MC Chair, Vice Chair, and Secretary determine and assign the CIPF facilitator role to a Member, a PJM Staff professional, or an external professional. Facilitation of the meeting shall be done in a non-partisan and effective manner.
- Presentation timing -- As determined on an CIPF by CIPF basis, the MC Chair, Vice Chair, and MC Secretary shall use their best non-partisan judgement to

fairly allocate the speaking times for all final CIFP meeting participants. These decision makers will consider the following parameters in their decision making:

- Balancing Sector time allocation appropriately with Sector interests
  - Consideration of Sector impact of proposed changes
  - Consideration of Impact of changes on individual Members
  - Fixed time limits for any individual Member
  - Consideration may be given to Members with self-selected coalitions may be given more time than individual Members
  - Other factors as appropriate
  - States will be offered a time limited opportunity to speak following PJM
  - IMM will be offered a time limited opportunity to speak during the meeting. If the IMM cannot support the PJM package, they may offer an alternative package focused on row by row concerns similar to Member CIFP meeting requirements.
- Member presentation slides are not permitted at the final meeting.
  - Appropriate time will be allotted for Q&A between the Board and Members

#### After the Stage 4 CIFP Meeting

At the conclusion of the “Final Meeting”, an MC meeting will be convened to vote on the packages. Sector weighted voting on all packages will occur concurrently, similar to 2019 MIC voting. As with all MC sector weighted votes, a MC level voting report will be prepared and posted and available to the Board.

If a package achieves greater than 2/3 support, or the package with the greatest support if more than one reach 2/3 support, the issue can be filed as a Section 205 at FERC with Board concurrence.

#### After the MC Meeting

The Board is required to communicate to the Members before filing a solution at FERC. The communication will include detailed response on why they selected the solution they did; focus on the contentious lines in the matrix - include justification/reasoning to facilitate Member understanding.

Once all steps of this process have been completed, the Board retains its authority to consistent with their charter