



Sending a Copy of Initial FERC Filings to PJM

Steven Pincus, Associate General
Counsel

Markets & Reliability Committee

September 21, 2022

- PJM is responsible for the administration of the RTO Governing Documents, but has experienced times when a initial filing is made by a Member has been not provided to PJM (or its IMM) that directly impacts the administration of the Governing Documents.
- While FERC has rules regarding who should receive a copy of certain initial filings, currently there are not clear rules with respect to other filings of concern to PJM and its Members that directly affect or pertain to the Governing Documents.

- Section 205 Filings (e.g. Reactive Rate Filings, IMM not copied);
- Section 206 Complaints (IMM not copied);
- Petitions for Declaratory Orders;
- Requests for Waiver of PJM's Tariff Requirements;
- Section 203 Transactions; and
- Applications for Market-Based Rate Authority and related filings and reports (e.g. Notices of Succession) .

- PJM proposes that this work effort be assigned to a MRC Senior Task Force and use the CBIR Lite process.
- Key Work Activities and Scope
 - Review and provide education on the need for PJM to be copied with initial filings that impact PJM’s rights and obligations under the Governing Agreements.
 - Develop a solution to include in the PJM Governing Documents and/or Manuals, as appropriate, that addresses the concern raised in the Problem Statement/Opportunity Statement.

Presenter

Steven Pincus, Steven.Pincus@pjm.com



Member Hotline

(610) 666 – 8980

(866) 400 – 8980

custsvc@pjm.com

**PROTECT THE
POWER GRID**
**THINK BEFORE
YOU CLICK!**



Be alert to
malicious
phishing emails.

Report suspicious email activity to PJM.
(610) 666-2244 / it_ops_ctr_shift@pjm.com

