

PJM RPCTF: Disposition Notification Timing

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PJM Tariff & FERC 203 Timelines Do Not Align

- PJM Tariff: 90-day notification before transferring ownership of a facility with Schedule 2 tariff, per [OATT Schedule 2](#)
- Federal Power Act Section 203(a)(1): need FERC approval for transfer of jurisdictional facilities \$10M+, up to 180-day review period per 203(a)(5), but commonly quicker (<60 days) where market power issues do not exist.
- Alignment issue: generator owners must submit notice to PJM 90 days before an unknown date. Results in numerous waiver requests of this 90-day provision¹.
- GlidePath proposed solution: maintain 90-day requirement for facilities not requiring 203 approval, but have notice to PJM of filing under 203 constitute notice to transfer.

¹ Several waivers requested in 2021 alone, including: ER19-2858-005, ER20-2148-003, ER20-2452-001, ER20-2453-002, ER21-2209-000