

# PJM Manual 14C

Proposed Friendly Amendment or in  
alternative proposed alternative

Greg Poulos, CAPS

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# Today's discussion and focus on 6.1.2 and 6.2.1

- Modify Section 3.1.2 Assignments and Entity Changes
- Modify Section 5, Option to Build
- Modify Section 6.1.2 Tracking of Baseline Projects (Today's Discussion)
- New Section 6.1.2.1 Cost Tracking for Baseline Projects
- Modify Section 6.2.1 Tracking of Supplemental Projects (Today's Discussion)
- New Section 6.2.1.1 Supplemental Cost Tracking

# The concern and the process

- The proposed language in Manual 14C is not consistent with the recently reviewed language in Manual 14B.
- The language in Manual 14C is currently going through the process – and thus, is where we can address any issues.
- In 14B the transmission owners must update PJM on the status of state regulatory approval in the quarterly updates.
- In 14C the onus is on PJM to “request” the status of state regulatory approvals
- The language in Manual 14B and 14C set vastly different expectations on the same subject.
- Currently, PJM does not wait for state approval of supplemental projects. With this change it is less likely that PJM will even be aware of the state procedural process.

**1.4.2.3 When a baseline upgrade is included in RTEP base case (in a prior RTEP cycle) and a Supplemental Project or Customer-Funded Upgrade is identified which interacts with the need for the baseline upgrade**

PJM will review the needs for each of the upgrades or projects and review these needs with the stakeholders. This review will include, but is not limited to, the determination of how each upgrade or project may or may not satisfy the needs of one or more of the processes, and a review of the proposed schedules for the upgrades or projects and the system timing needs in order to inform these discussions.

Following a review of the applicable information, PJM shall determine the steps to be taken in order to preserve baseline reliability while also accommodating other system needs for the M-3 and the New Services Queue processes. Stakeholders will be provided an opportunity to discuss PJM's findings prior to PJM making a decision as to how PJM will proceed.

The Transmission Owners provide status updates in accordance with Section 6 of Manual 14C. **Such status updates should include an indication of any relevant regulatory siting authority approval necessary for the project and the status of such approval.** If at any time, PJM identifies a baseline need where a possible baseline upgrade would more efficiently and cost-effectively address the baseline need, as well as the identified needs for any proposed Supplemental Project, PJM will notify the relevant regulatory siting authority where the Supplemental Project is being reviewed that PJM has identified a baseline violation for which the baseline upgrade may impact the supplemental need for the Supplemental Project.

The relevant language in PJM Manual 14B (For reference only No changes suggested or in-progress)

# PJM's proposed language for 14C

Relevant aspects of 6.2.1 Supplemental Updates Projects)

\*Endorsed by PC, First read at MRC, Motion to Defer at December MRC

\*same applies to 6.1.2 Baseline Upgrades

## 6.2.1 Tracking

The PJM Interconnection Coordinator is responsible for tracking the completion of supplemental upgrades. ~~Regular updates from the Transmission Owner need to include the following:~~

PJM may request additional information regarding projects, including status of permits and state approvals that impact the project schedule. Any permit or certificate delays that are anticipated to impact the projected in-service date should be timely communicated to PJM.

Regular updates from the Transmission Owner need to include the following:

- General status of engineering and construction
- Percent complete (Transmission Owners should follow 'percent complete' guidance given in the 'Schedule and Milestone Tracking' section)
- Current target in-service date or actual completion date

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# My proposal for Manual 14C

6.1.2 Baseline Project Tracking and 6.2.1 Supplemental Project Tracking  
(in coordination w/ PJM per December MRC motion to defer, **red is change from PC endorsement**)

6.1.2 Tracking: PJM may request additional information regarding projects **consistent with PJM Manual 14B, section 1.4.2.3**, ~~including status of permits and state approvals that impact the project schedule~~. Any permit or certificate delays that are anticipated to impact the projected in-service date should be timely communicated to PJM. Regular updates need to include the following:

- General status of engineering and construction **(including any relevant regulatory siting authority approval necessary for the project and the status of such approval)**
- Percent complete (Transmission Owners should follow 'percent complete' guidance given the 'Schedule and Milestone Tracking' section)
- Current target in-service date or actual completion date

6.2.1 Tracking: PJM may request additional information regarding projects **consistent with PJM Manual 14B, section 1.4.2.3**, ~~including status of permits and state approvals that impact the project schedule~~. Any permit or certificate delays that are anticipated to impact the projected in-service date should be timely communicated to PJM. Regular updates from the Transmission Owners need to include the following:

- General status of engineering and construction **(including any relevant regulatory siting authority approval necessary for the project and the status of such approval)**
- Percent complete (Transmission Owners should follow 'percent complete' guidance given the 'Schedule and Milestone Tracking' section)
- Current target in-service date or actual completion date

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