

8.6.4 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 for contentious issues with known PJM and/or FERC implementation deadlines that were not resolved, or would be extremely difficult to resolve, within the normal CBIR Stakeholder process. The CIFP process ~~is to~~should only be used ~~on~~for major issues ~~only~~ in extraordinary circumstances (e.g. 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 achieved, or are unlikely to achieve, consensus, or
- For a new issue, by a greater than 2/3 sector-weighted ~~MC Members Committee~~ vote ~~on a PS/IC~~ in favor of sending a letter to the Board requesting the CIFP process be initiated, or
- For an in-process stakeholder issue, at proposal-development stage or later, by a greater than 2/3 sector-weighted ~~Members Committee~~ ~~MC~~ vote ~~on a PS/IC~~ in favor of sending a letter to the Board requesting the CIFP process be initiated

Schedule and Timeline

General

~~It is envisioned that~~ the CIFP process ~~could~~can be completed in as few as ~~5~~five consecutive days or take up to several months depending on the issue and necessary deadlines. For stages ~~one, two, and three, 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 meet decision deadlines. CIFP meetings can require cancellation or rescheduling of any other stakeholder meetings, including standing committees.

The PJM Board will approve initiation of the CIFP process, establish objectives, establish deadlines, and solicit detailed Member feedback at the Stage Four Meeting.

CIFP Participation and Attendance

Pre-CIFP – Stage Three

- Open to all stakeholders.
- Media permitted, but without individual attribution.
- The Board is encouraged to participate during these stages.

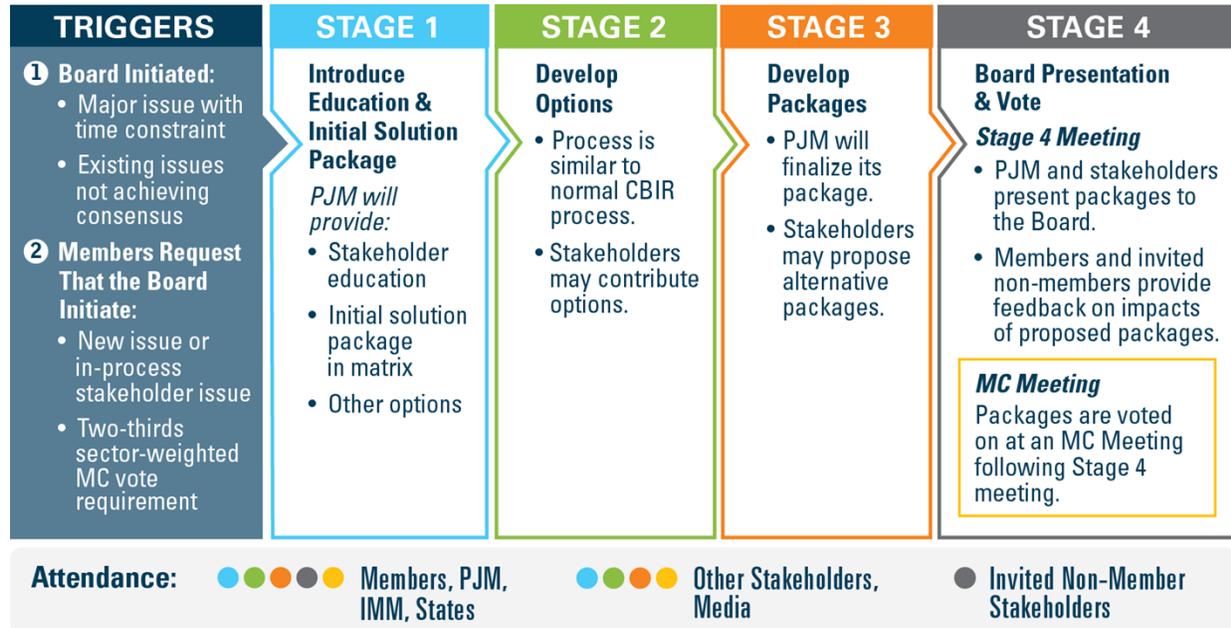
Stage Four Meeting

- PJM Board attendance is required for the Stage Four Meeting with two or more Board members in person consistent with Members Committee protocols. Other Board members may participate remotely.
- The Stage Four Meeting is open only to Members, IMM, States, PJM and invited non-Members. The participation of non-Members will be at the discretion of the Members Committee Chair in consultation with the Members Committee Vice Chair and Members Committee Secretary.
- Media are not permitted at the Stage Four Meeting (same rules as the Liaison Committee).

Stage Four Members Committee Meeting

- PJM Board attendance is required for the stage four Members Committee Meeting with two or more Board members in person consistent with Members Committee protocols. Other Board members may participate remotely.
- Open to all stakeholders.
- Media permitted, but without individual attribution.

Stages and Process



*For full CIFP requirements, refer to M34, Section 8.6.4.

CIFP Meeting Stages PJM will facilitate any pre-CIFP meetings and stages one through three of the CIFP process unless stakeholders follow the procedures for an alternate facilitator.

Stages one through three will be facilitated using the CBIR option/solution matrix. During stages one through three of the CFIP process, stakeholders may add alternate options to the initial matrix and will have the opportunity to contribute alternative solution packages. Stakeholders will be presented with the details of PJM decision making and focus on improving solution options, noting key areas of support and/or concerns. In addition to the normal value resulting from creating and utilizing a CBIR solution matrix to facilitate consensus building, the CIFP matrix has the additional purpose to enhance the Board's decision making regarding its solution package if stakeholder consensus is not achieved in a Members Committee vote.

In addition, PJM may provide a whitepaper or briefing paper as needed. Stakeholders do not have any requirement for developing a whitepaper¹.

Before the Stage One Meeting(s)

¹ Stakeholders always have the normal communication protocols with the Board of Managers available.

For new CIFP issues, PJM will create a Problem Statement and Issue Charge as informational to stakeholders and to set the scope and deliverables. No Members Committee approval vote is required.

PJM and the IMM will meet prior to stage one. The IMM will provide its feedback on the PJM package and discuss its alternative package, if applicable.

If time allows and/or as needed, pre-CIFP stakeholder meetings may be held to allow for additional education and topic discussion.

● Stage One

Stage 1— Similar to the normal CBIR process, PJM will provide stakeholder education, and a pre-populated matrix with its initial solution package and alternatives solution options considered, including its option alternatives to stakeholders.

- PJM will present education, simulation results, review studies performed, and will review forecasted market impacts as appropriate.
- PJM will present a “pre-loaded” options matrix with design components, the initial PJM package, and all solution options alternatives considered by PJM.
- PJM will note PJM’s preferred option choices and the reasons therefor.

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. **Stage Two**

● Stage 2— Stakeholders may discuss any previously considered solution options and/or may offer new solution option alternatives, with row-by-row reviews of the CIFP matrix. Stakeholders will have an opportunity to offer feedback, alternative ideas, and request additional information or studies that will be prioritized by PJM and completed on an expedited schedule, as time and resources permit.

Stage Three

● Stage 3— Based on the row-by-row discussions, PJM will finalize its package, and stakeholders will may create contribute alternative packages.

PJM and any stakeholders offering packages may produce a short briefing document for their package to aid the Board and stakeholders in understanding their proposal and key differences between their proposal and other offered proposals for use during stage four. The CIFP facilitator will determine the appropriate length limit of the briefing document based on the complexity of the issue and number of proposals.

PJM will facilitate the first three meeting stages. **Stage Four**

Stage Four of the CIFP process is comprised of a Stage Four Meeting and a Members Committee Meeting. Ideally, these meetings will be scheduled on the same day. If feasible, the Stage Four Meeting and Stage Four Members Committee Meeting will be conducted as in-person meetings (no

phone or video). If an in-person meeting is not feasible, the in-person meeting requirement may be waived at the discretion of the Members Committee Chair.

The Members Committee Chair, Members Committee Vice Chair, and Members Committee Secretary determine and assign the Stage Four Meeting 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.

Prior to establishing the agenda for the Stage Four Meeting, the Members Committee Chair will invite stakeholders to indicate their interest(s) in speaking at the Stage Four Meeting and to provide the specific interests that they want to communicate to the Board for use by the Members Committee Chair in determining the Stage Four Meeting agenda and time allocations.

Stage Four Meeting

The purpose of the Stage Four Meeting is to aid the Board in its decision-making and to facilitate stakeholder-to-Board conversation. As such, stakeholder-to-stakeholder debate will not be permitted (similar to a Liaison Committee meeting).

- **as appropriate**

Stage 4 —“Final Meeting”: ~~For the benefit of all meeting attendees, PJM- and stakeholders who contributed alternative packages will be allocated a time-limited opportunity to present to the Board. PJM will review its package proposal in the solution Matrix on a row-by-row basis to show how its solution addresses the PS/IC~~ Problem Statement/Issue Charge. Stakeholders who contributed alternative packages will review their packages, focusing on how their package differs from PJM's and other offered alternative packages.

At the conclusion of the PJM presentation, Members, the IMM, States, and invited non-Member stakeholders may provide time-limited feedback to the Board individually or in self-selected coalitions. Stakeholder comments shall focus on support or concerns with package details as shown on the matrix. Package sponsors may be allocated time-limited comments after stakeholder feedback.

~~Members and invited non-Member stakeholders, whether individually or in self-selected coalitions, will provide feedback to the Board on the impacts, positive or negative on the option details contained within the solution Matrix. Strict time-limited presentations will be enforced for all speakers. As the issues and interests vary, deference will be afforded to the Members Committee Chair, Members Committee Vice Chair, and Members Committee Secretary to determine the allowed speaking times. The Members Committee Chair, Members Committee Vice Chair, and Members Committee Secretary shall use their best non-partisan judgement to fairly allocate the speaking times for all Stage Four 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 speaker
- Consideration may be given to Members with self-selected coalitions may be given more time than individual Members

- Appropriate time at the Stage Four Meeting will be allotted for Q&A between the Board and stakeholders presenting a package or proving feedback.
- Other factors as appropriate

Stage Four Members Committee Meeting

After the Stage Four Meeting, a Members Committee meeting will be convened to vote on the packages.

- The stage four Members Committee meeting may last up to two hours.
- Package sponsors will have a time-limited opportunity to offer a summary and/or clarification points on their packages prior to the vote.
- Following the summary from package sponsors, Members will be given the choice to move straight to a vote on the packages with no further discussion or have time-limited additional discussion of the packages prior to the vote.
- Sector-weighted voting on all packages will occur concurrently. As with all Members Committee sector-weighted votes, a Members Committee 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 package were to reach 2/3 support, the package may be filed as a Section 205 at FERC.

~~As the issues and interests vary, deference will be afforded to the MC Chair, Vice Chair, and MC Secretary to determine the allowed speaking times. Similar to an LC meeting, the purpose of the meeting to facilitate Member-Board communications. Therefore, the CFIP Final Meeting is not a regular stakeholder meeting, and Member-to-Member discussion on points and counter points will not be 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 the reasons therefor.~~
- ~~3. PJM presents simulation results, review studies performed, and reviews forecasted market impacts as appropriate.~~
- ~~4. Stakeholders will have an opportunity to offer feedback, alternative ideas, and request additional information or studies that will be prioritized by PJM and completed on an expedited schedule, as time and resources permit.~~
- ~~5. As outlined in Manual 34, PJM will facilitate the CIFP process using the CBIR option/solution matrix unless stakeholders follow the procedures for an alternate facilitator. In addition, PJM may provide a whitepaper or briefing paper as needed. Stakeholders do not have any requirement for developing a whitepaper.~~
- ~~6. Stakeholders do not have any requirement for developing a whitepaper. Stakeholders always have the normal communication protocols with the Board of Managers available. During stages~~

one through three of the CFP process, stakeholders may add alternate options to the PJM's initial matrix that could lead to alternative solution packages. In addition to the normal value resulting from creating and utilizing a CBIR solution matrix to facilitate consensus building, the CFP matrix has the additional purpose to enhance the Board's decision making regarding its solution package if stakeholder consensus is not achieved in an MC vote.

Roles and Responsibilities

1. PJM to create the initial CFP 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. PJM and the IMM will meet prior to Stage 1 meeting. The IMM will provide its feedback on the PJM package and discuss its alternative package, if applicable.
5. PJM Board will approve initiation of the CFP process, establish objectives, establish CFP deadlines, and solicit detailed Member feedback at the final CFP.

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) CFP 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 CFP meeting may last up to 4 hours of Member-Board conversation (including time-limited comments from the IMM, invited nonMembers and states).
- Prior to establishing the agenda for the Final CFP Meeting, the MC Chair will invite the Members to indicate their interest(s) in speaking at the Final Meeting and to provide their specific interests that they want to communicate to the Board regarding the CFP matrix row comments for use by the MC Chair in determining the Final Meeting agenda and time allocations.

Speaker comments shall 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. The participation of non-Members will be at the discretion of the MC Chair in consultation with the Vice Chair and MC Secretary. Strict time limited presentations will be enforced for all speakers. In person only meeting participation (no phone or video)
- Media rules will be the same as for the Liaison Committee.

Facilitation

The MC Chair, Vice Chair, and Secretary determine and assign the CFP 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 topics and interests will change for each time the CIFP process is utilized, 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 at the Final Meeting 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. As with all MC sector-weighted votes, an 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 package were to reach 2/3 support, the package may be filed as a Section 205 at FERC.

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After the Stage Four MC Members Committee Meeting

The Board is required to communicate to the Members before filing a proposal with FERC. The communication will include a detailed response on the decision-making behind the solution selected by the Board why the Board selected the solution they did, focusing on the contentious lines in the matrix and including justification/reasoning to facilitate Member stakeholder understanding.

~~Once all steps of this process have been completed, the~~The Board retains its authority to act consistent with the PJM Operating Agreement.