



MC Legal Report
Summary of Significant Filings, Legal Activity
and
Federal Energy Regulatory Commission (Commission) Orders
(March 9, 2020 – May 12, 2020)

ORDERS

On May 12, 2020, in Docket No. ER20-1336, the Commission issued a letter order accepting the proposed revisions to the confidentiality provisions of the PJM Operating Agreement to: (i) provide near-term reliability data to PJM's transmission owners; and (ii) add transmission operators to the list of reliability entities to whom PJM may provide information for reliability purposes. The revisions were accepted without further conditions and are effective May 18, 2020, as requested by PJM.

On May 12, 2020 in Docket No. ER20-1387, the Commission issued a letter order accepting revisions to PJM Tariff, Attachment H-27A and Attachment H-27B submitted by Silver Run Electric, LLC (Silver Run) to: (i) include a note in its formula transmission rate to clarify how Silver Run will depreciate Contributions in Aid of Construction for transmission facilities; (ii) correct certain errors in Silver Run's Formula Rate; and (iii) modify the posting requirements related to Silver Run's Formula Rate Implementation Protocols. The revisions are effective as of May 25, 2020, as requested.

On April 24, 2020, in Docket No. ES20-26, PJM requested the Commission issue an order under Federal Power Act, section 204, authorizing: (i) a total line of credit to PJM of \$200 million, consisting of an existing \$150 million line of credit with PNC Bank, N.A. ("PNC") and a new short-term (364-day) revolving line of credit with PNC of \$50 million; and (ii) the ability of PJM to provide a line of credit to PJM Settlement, Inc., not to exceed PJM's total available capacity under the combination of the two lines of credit from PNC. PJM explained in its filing that it will use this combined, increased liquidity to manage the financial uncertainties arising from the impact of the COVID-19 national emergency on PJM and the PJM markets. PJM requested that the Commission issue an order granting the requested authorizations by May 26, 2020, and that the Commission make the authorizations effective as of the date of issuance of such order.

On April 7, 2020, in Docket No. ER17-1519-003, the Commission issued a letter order accepting PECO Energy Company's filing in compliance with the Commission's December 5, 2019 order and Settlement Agreement to set the effective date of December 5, 2019 for PJM Tariff, Attachment H-7C PECO's formula rate protocols.

On April 17, 2020, in Docket No. EL17-62, the Commission issued an order denying the complaint of Potomac Economics, Ltd. (Potomac) against PJM, in which Potomac asserts that PJM's requirements that external resources obtain a pseudo-tie to participate in PJM's capacity market is unjust and unreasonable. The Commission found that the complaint failed to demonstrate that PJM's pseudo-tie construct is unjust and unreasonable. The Commission denied PJM's Motion to Dismiss, as it found that Potomac, as the market monitor, has authority to file a complaint under FPA section 206, and meets the Commission's filing requirements. The Commission also denied

various parties' requests for a technical conference, concluding that the paper record was sufficient to resolve the issues regarding pseudo-ties. Additionally, the Commission declined to consider Potomac's proposed capacity delivery procedures.

On April 16, 2020, FERC issued its order ("April 16 Order") in Docket No. EL18-183 (171 FERC ¶ 61,025) on a paper hearing following FERC's November 15, 2018 order that granted in part the Radford's Run Wind Farm, LLC ("Radford") complaint. In its complaint, Radford objected that PJM did not determine or certify Incremental Capacity Transfer Rights ("ICTRs") as a result of the System Impact Study ("SIS") for its interconnection request. In the April 16 Order, FERC found that the PJM Tariff required PJM to use the information available to PJM at the time it completed the SIS for Radford's interconnection request when it evaluated the Radford Upgrade for ICTRs. The April 16 Order therefore requires PJM to award any ICTRs that would have been assigned to Radford based on data as of December 2015; and requires PJM to make a compliance filing within 60 days (i.e., by June 15, 2020) detailing its determination on ICTRs for the Radford Upgrade using the information available to PJM at the time it completed the SIS. The April 16 order further requires that, if PJM determines Radford is entitled to ICTRs, PJM must determine whether Radford would have been entitled to payment relating to the Base Residual Auctions held in 2016, 2017, and 2018, which provide payments for the 2019/2020, 2020/2021, and 2021/2022 Delivery Years, respectively. For the latter two years, PJM will be expected to include any Radford ICTRs as a result of the Radford Upgrade for certification in the Base Residual Auctions for the 2020/2021 and 2021/2022 Delivery Years, and PJM's compliance filing should include PJM's recalculation of ICTRs for the 2020/2021 and 2021/2022 Delivery Years. The April 16 order requires PJM is to submit, as part of its compliance filing, a refund report showing the resettled amounts.

On April 16, 2020, in Docket No. EL16-49-002, the Commission issued an order denying in part and granting in part requests for rehearing and clarification of the Commission's December 19, 2019 order determining the just and reasonable replacement rate for PJM's MOPR. The order also directs PJM to submit a compliance filing within 45 days of the issuance of the order. As a result, PJM will be required to submit a compliance filing that complies with the directives in the April 16, 2020 rehearing order by June 1, 2020.

On April 16, 2020, in Docket No. EL18-169, the Commission issued an order dismissing as moot a complaint filed against PJM alleging that PJM's MOPR is unjust and unreasonable. The order finds that the determination sought by petitioners was made by the Commission in a related proceeding, Docket No. EL16-49-000, et al. in an order issued June 29, 2018. The complaint also seeks a replacement MOPR, a matter subsequently addressed and rendered moot by a Commission order issued in the PJM Capacity Market Proceeding on December 19, 2019.

On April 16, 2020, in Docket No. EL16-49-001, the Commission issued an order denying requests for rehearing and granting requests for clarification of the Commission's June 29, 2018 order finding PJM's then-existing tariff unjust and unreasonable because it failed to protect the integrity of competition in the capacity market against the price-distorting impact of resources receiving out-of-market support.

On April 16, 2020, in Docket No. ER19-105-004, the Commission issued an order denying the rehearing requests of the PJM Power Providers Group, PSEG and the

Public Interest Entities. The rehearing requests pertained to the Commission's April 15, 2019 order accepting PJM's quadrennial revision of its Variable Resource Requirement Curve used in the Reliability Pricing Model.

On April 15, 2020, in Docket No. ER19-2282-001, the Commission issued a letter order accepting the compliance filing of the New York Independent System Operator, Inc. (NYISO) and PJM. The compliance filing establishes an effective date of April 7, 2020 for the revisions to the NYISO-PJM Joint Operating Agreement developed to implement a streamlined and improved method of determining and calculating Market-to-Market Entitlements.

On April 14, 2020, in Docket No. ER20-1009-000, the Commission issued a letter order accepting PJM's revisions to PJM Tariff, Attachment K-Appendix, sections 7.1, 7.1A, and 7.2 and to the identical corresponding provisions in PJM Operating Agreement, Schedule 1, sections 7.1, 7.1A, and 7.2. The revisions enhance PJM's Financial Transmission Rights auction process in a manner that reduces financial risk to PJM and its Members, thereby implementing several key recommendations of the Report of the Independent Consultants on the GreenHat Default. The revisions are effective April 15, 2020.

On April 10, 2020, in Docket No. ER19-2417-001, the Commission issued a letter order accepting PJM's October 11, 2019 compliance filing containing revisions to the PJM Tariff, as directed by the Commission in its order issued on September 16, 2019. The revisions clarify that the requirement to submit a plan only applies to the Capacity Market Sellers that seek an exception to the Reliability Pricing Model (RPM) must-offer requirement on the basis that a Capacity Resource is physically incapable of meeting the Capacity Performance Resource requirements. The revisions are effective September 23, 2019.

On April 3, 2020, in Docket Nos. ER15-1387-005 and ER15-1344-006, the Commission issued an order denying rehearing and granting clarification. Specifically, the Commission: (i) regarding refunds, denied Linden VFT, LLC's (Linden) request for rehearing and granted Old Dominion Electric Cooperative's (ODEC) and Dominion's requests for clarification by clarifying that the August 30, 2019 Order on Remand required PJM to rebill parties with interest back to May 25, 2015; (ii) denied Con Edison' and Linden's requests for rehearing on the basis that the Commission should have limited its response on remand solely to high-voltage facilities; and (iii) denied Con Edison's rehearing request that it is inequitable for it to bear the financial impact of the Sewaren Project costs when Con Edison does not derive any benefit from the project.

On April 3, 2020, in Docket Nos. ER15-1387-006 and ER15-1344-007, the Commission issued an order on compliance accepting PJM's October 29, 2019 filing in compliance with the Commission's August 30, 2019 order on remand to revise PJM Tariff, Schedule 12-Appendix A cost allocations for 44 enhancements and expansions included in the Regional Transmission Expansion Plan (RTEP) solely addressing individual Transmission Owner Form No. 715 planning criteria and allocated 100 percent to the zone of the Transmission Owner who filed the Form No. 715 criteria for the period May 25, 2015 through August 30, 2019.

On April 3, 2020, in Docket No. ER20-955, the Commission issued an order accepting revisions to PJM Tariff, Attachment K-Appendix, section 6.6 and the parallel provisions in Operating Agreement, Schedule 1, section 6.6, to make clear that when a generation resource fails the three-pivotal-supplier test, it is evaluated on its cost-based offer, and that, when certain emergency conditions are triggered, a generation resource is evaluated on its market-based parameter-limited offer. The revisions are effective April 6, 2020.

On April 3, 2020, in Docket No. ER20-1133, the Commission accepted revisions to PJM Tariff, Attachment L to add Silver Run Electric, LLC (Silver Run) as a new transmission owner. PJM requested a placeholder effective date of 12/31/9998 due to the uncertainties present with construction and energization of the facilities. PJM is directed to submit a further compliance filing to replace the placeholder effective date within 15 days from the in-service date with the actual effective date.

On April 3, 2020, in Docket No. ER20-1132, the Commission accepted revisions to CTOA, Attachment A to add Silver Run as a new transmission owner. PJM requested a placeholder effective date of 12/31/9998 due to the uncertainties present with construction and energization of the facilities. PJM is directed to submit a further compliance filing to replace the placeholder effective date within 15 days from the in-service date with the actual effective date.

On April 3, 2020, in Docket No. ER20-1165, the Commission issued a letter order accepting revisions to the PJM Tariff, Schedule 12 – Appendix A Jersey Central Power and Light Company, Monongahela Power Company, AEP Service Corporation and Virginia Electric and Power Company (collectively, Schedule 12 – Appendix A) to incorporate revisions filed and accepted by the Commission effective January 1, 2020 into the versions of the Schedule 12-Appendix A filed and accepted by the Commission effective January 29, 2020. Due to the overlapping timing of filings and effective dates, the revisions effective January 1, 2020 will not be reflected correctly in the Schedule 12 – Appendix A tariff records effective January 29, 2020 absent this clean up. The revisions remain effective as of January 29, 2020 as accepted by the Commission.

On March 31, 2020, the United States District Court for the Eastern District of Virginia (the District Court) issued an opinion and order granting PJM's motion to dismiss ODEC's claims for costs allegedly incurred during the January 2014 Polar Vortex. The District Court found that such claims for compensation fall entirely within the PJM Tariff and therefore are exclusively governed by federal law and barred by the filed-rate doctrine. Therefore, ODEC's complaint is dismissed.

On March 31, 2020, in Docket No. ER18-680, the Commission issued an order on PJM's January 19, 2018 filing revising Schedules 12-Appendix and Appendix A to convert Linden and Hudson Transmission Partners, LLC (HTP) Firm Transmission Withdrawal Rights (TWRs) to Non-Firm TWRs in compliance with the Commission's December 15, 2017 orders. Specifically, in the March 31 order, the Commission rejected in part PJM's revisions to the PJM Tariff, Schedules 12-Appendix and Appendix A (with the exception of Schedule 12-Appendix A for Baltimore Gas and Electric Company and Public Service Electric and Gas) eliminating Linden's and HTP's cost responsibility assignments for lower voltage facilities using violation-based DFAX and economic projects. The accepted revisions are effective as of January 1, 2018. The

Commission directed PJM to submit a compliance filing to eliminate the revisions include in PJM's January 19, 2018 filing within 60 days from the date of this order.

On March 30, 2020, in Docket No. ER20-1392, the Commission issued an order granting PJM's March 25, 2020 limited-time blanket waiver of certain generator interconnection-related deadlines under the PJM Tariff to allow New Service Customers, Interconnected Transmission Owners, and PJM additional time to meet those deadlines in light of the ongoing National Emergency that has been declared due to the Novel Coronavirus Disease. The waiver is granted with an effective date of March 31, 2020.

On March 26, 2020, in Docket No. ER18-87-002, the Commission issued an order denying rehearing. The order denies PJM and the IMM's requests for rehearing of the March 30, 2018 order rejecting PJM's October 17, 2017 proposal to reform its Regulation market.

On March 26, 2020, in Docket No. ER19-1651, the Commission issued an order approving the contested April 23, 2019 Settlement that resolves the complaints filed by ESA and RESA/Invenergy in 2017 regarding certain changes to PJM's Regulation Market. Consistent with the terms of the Settlement, the Commission directed PJM to submit a compliance filing within 30 days to include the Settlement as an attachment to the PJM Tariff.

On March 26, 2020, the Commission issued an order denying requests for rehearing on the revisions pertaining to the Incremental Auctions in Docket Nos. ER18-988-001, EL14-48-001, ER14-1461-002. Specifically, FERC explained in the rehearing order that it was appropriate to terminate the section 206 proceeding because the evidence in the record did not sufficiently demonstrate the existence of speculative bidding behavior by Capacity Market Sellers buying out of capacity commitments in the Incremental Auctions. FERC also addressed its rejection of the sell-back offer price proposal and indicated that the record does not warrant an artificial floor for sales of excess capacity without reference to the demand curve.

On March 26, 2020, in Docket No. ER20-903, the Commission issued a letter order accepting PJM's revisions to the PJM Tariff and the PJM Operating Agreement to incorporate previously accepted revisions that otherwise would not be reflected due to overlapping filing dates and effective dates of certain PJM filings. No substantive revisions were contained in the clean-up filing. The revisions are effective December 3, 2019.

On March 25, 2020, in Docket No. ER20-1036, the Commission issued a letter order accepting Potomac revisions to the PJM Tariff, Attachment H-11A to remove the Other Supporting Facilities Charge (OSFC) applicable to FC Landfill because the Interconnection Agreement under which OSFC was charged terminated. As a result, FC Landfill is no longer taking transmission service from Potomac. The revisions become effective April 20, 2020.

On March 20, 2020, in Docket Nos. ER17-1138-002 and 003, the Commission issued an order denying the rehearing requests of the Illinois Municipal Electric Agency and American Municipal Power, Inc. and accepting PJM's proposed tariff changes submitted in compliance with the Commission's order issued on November 17, 2017 pertaining to

the establishment of enhanced requirements for external resources that seek pseudo-tie into PJM. The revisions are effective May 9, 2017.

On March 20, 2020, in Docket Nos. ER19-2915-000 and -001, the Commission accepted revisions to the PJM Operating Agreement, Schedule 6, section 1.5 regarding proposers' ability to voluntarily submit cost commitment proposals during RTEP project proposal windows, and PJM's consideration of such cost commitment proposals through a comparative review and analysis. The Commission concluded that the revisions add clarity that the submission of such cost commitments must at all times remain voluntary, developers are to submit information to define the binding elements of the proposal, PJM will include in its assessment of a proposal's cost-effectiveness the quality and effectiveness of any submitted binding cost commitment proposal, and enhance transparency into how PJM will determine the cost and overall cost-effectiveness of competing proposals. The revisions are effective as of January 1, 2020.

On March 16, 2020, in Docket No. ER20-736, the Commission issued a letter order accepting revisions to the PJM Tariff, Schedule 12-Appendix A to incorporate cost responsibility assignments for 20 baseline upgrades included in the recent update to the RTEP approved by the PJM Board of Managers on December 4, 2019. The revisions become effective on April 2, 2020.

FILINGS

On May 12, 2020, in Docket Nos. ER20-1132-001 and ER20-1133-001, PJM submitted a compliance filing to provide the Commission with an actual effective date of April 28, 2020, that the Silver Run facilities were placed into service and Silver Run became a transmission owner in PJM.

On May 8, 2020, in Docket No. ER20-1383-001, PJM submitted on behalf of PECO Energy Company (PECO) amendments to depreciation and amortization rates set forth in PECO's transmission formula rate template (PJM Tariff, Attachment H-7A) filed on March 25, 2020. PECO requested an effective date of May 29, 2020.

On May 7, 2020, in Docket Nos. 20-1059, et al., PJM submitted a notice of intention to participate in support of petitioners and non-binding statement of issues. PJM anticipates that it may support one or more petitioners in the consolidated review proceedings on one or more issues and anticipates joining a brief in support of respondent on select issues.

On May 7, 2020, in Docket No. ER20-1783 and ER20-1784, PJM and NextEra Energy Transmission MidAtlantic Indiana, Inc. (NEET MidAtlantic Indiana) jointly filed proposed revisions to the PJM Tariff and CTOA that are necessary to accommodate NEET MidAtlantic Indiana's acquisition of certain transmission facilities from Commonwealth Edison Company of Indiana, Inc. that are currently under PJM's functional control. The Parties have included a placeholder effective date of "12/31/9998" in the eTariff metadata of this filing and propose to submit a further filing within 15 days of the closing date of the transaction, specifying the date on which the PJM Tariff and CTOA revisions submitted in this filing took effect.

On May 6, 2020, in Docket No. EL19-91, PJM submitted a motion for leave to respond and limited response to LSP Transmission Holdings II, LLC April 3, 2020 reply relative to the Commission's order instituting a section 206 proceeding regarding PJM's exemption for immediate-need reliability projects.

On May 4, 2020, in Docket No. ER20-1764, PJM submitted proposed revisions to the PJM Operating Agreement. The revisions serve to enhance the Fuel Cost Policies rules by reducing some of the administrative burdens on Market Sellers associated with developing and maintaining Fuel Cost Policies as well as easing, in certain circumstances, the penalties for cost-based offers that do not adhere to an approved Fuel Cost Policy. PJM is requesting an effective date of September 1, 2020.

On May 1, 2020, in Docket No. EL20-30, PJM filed an Answer to the Complaint filed by the Indiana Municipal Power Agency and the City of Lawrenceburg, Indiana. PJM requests that the Commission deny the Complaint with respect to PJM, as PJM has no involvement in the provision of retail service, and therefore does not apply the Tariff provisions challenged by the Complaint to determine the existence or level of any retail service. PJM also requests that the Commission deny the Complaint with respect to PJM because precedent makes clear that the Commission may determine station power for transmission service differently than states determine station power for retail service.

On May 1, 2020, in Docket No. ER20-1737, PJM submitted proposed revisions to the PJM Operating Agreement, Schedule 12, and the RAA, Schedule 17, to (i) add new

members, (ii) remove withdrawn members, (iii) reflect the signatories to the RAA, and (iv) reflect members' whose corporate names changed through the first quarter of 2020. PJM requested the revisions be effective as of March 31, 2020.

On April 29, 2020, in Docket No. ER19-1958-002, PJM submitted a motion for leave to answer and answer to comments and protest filed in response to PJM's second filing in compliance with the Commission's December 19, 2019 Order regarding Order No. 845 revisions to generator interconnection procedures.

On April 29, in Docket No. ER15-994-000, PJM submitted its annual compliance report on unreserved use penalties, late study penalties, and the distribution of such penalties pursuant to Order No. 890 and Order No. 890-A to report PJM's assessment and distribution of operating penalties for the period of January 1, 2019 through December 31, 2019.

On April 29, 2020, in Docket Nos. ER18-1902-000 and ER18-1903, PJM filed a request for rejection of previously filed and accepted PJM Tariff and CTOA revisions subject to an effective date which would have replaced the City of Rochelle with NextEra as a PJM TO. PJM was informed that the transaction has been cancelled and the Tariff and CTOA sections filed in Docket Nos. ER18-1902-000 and ER18-1903-000 will not go into effect.

On April 27, 2020, in Docket No. EL19-100-000, PJM submitted a notice of intent advising of its intent to proceed on the basis that the commencement of the next Base Residual Auction ("BRA") is not conditioned upon the outcome of the proceedings in this docket.

On April 24, 2020, in Docket No. ES20, PJM Settlement requested the Commission issue an order under Federal Power Act, section 204, authorizing PJM Settlement to: (i) guarantee obligations of PJM Interconnection, L.L.C. ("PJM") in an amount not exceeding the \$170.6 million amount previously authorized by the Commission plus an additional \$50 million to reflect additional liquidity support being acquired by PJM, bringing the total guaranty amount to \$220.6 million; and (ii) provide a line of credit to PJM in an amount not exceeding the cash that PJM Settlement holds due to remittances from Market Participants that PJM Settlement is not yet obligated to disburse, in an amount not to exceed \$158.1 million. PJM Settlement explained in its filing that it seeks these authorizations to help manage near-term uncertainties in PJM administrative service revenues and expenses stemming from the novel coronavirus disease ("COVID-19") pandemic. PJM Settlement requested that the Commission issue an order granting the requested authorizations by May 26, 2020, and that the Commission make the authorizations effective as of the date of issuance of such order.

On April 17, 2020, in Docket No. ER20-1590-000, PJM submitted proposed revisions to the PJM Tariff, PJM Operating Agreement, and the RAA. The proposed revisions will enhance the testing requirements for Demand Resources and Price Responsive balancing the costs associated with such testing. PJM is requesting an effective date of June 16, 2020.

On April 15, 2020, in Docket No. SBA-2020-0015, PJM submitted public comments in response to the Small Business Administration's Interim Final Rule concerning the Paycheck Protection Program.

On April 7, 2020, in Docket No. ER19-1651-001, in compliance with the Commission's directive in its March 26, 2020 order approving the April 23, 2019 Regulation Market Settlement Agreement, PJM submitted an eTariff record of the Settlement Agreement for inclusion in the PJM Tariff. PJM is requesting an effective date of July 1, 2020.

On March 31, 2020, in Docket No. ER20-1451, PJM, in conjunction with PJM Settlement, submitted revisions to the PJM Tariff and the PJM Operating Agreement to enhance the rules for evaluating and managing credit risk posed by entities seeking to participate or participating in the PJM Markets. The proposed revisions will update and enhance PJM's procedures for monitoring and mitigating credit risk in the PJM Markets for the purpose of reducing and better managing the risk of financial defaults, which are ultimately borne by PJM Members. PJM proposed an effective date of June 1, 2020, for the proposed revisions, and requested that the Commission issue an order accepting the filing by no later than May 30, 2020, so that the new rules will be in place for its upcoming long-term Financial Transmission Rights auction scheduled to commence on June 2, 2020.

On March 27, 2020, in Docket No. ER20-1414, PJM submitted proposed revisions to PJM Tariff, Attachment K-Appendix, section 1.10, and to the identical corresponding provisions in PJM Operating Agreement, Schedule 1, section 1.10. The proposed revisions provide PJM Market Sellers with the ability to submit hourly differentiated segmented ramp rates for resources in both the PJM Day-ahead Energy Market and the Real-time Energy Market, and to update those values intraday. PJM is requesting an effective date of January 5, 2021.

On March 27, 2020, in Docket No. ER20-1416, PJM submitted proposed revisions to the Operating Agreement, Schedule 6, section 1.5.8(c)(i) that provide that any entity submitting a proposal through the proposal window process that is pre-qualified as eligible to be a Designated Entity must pay all actual proposal study costs incurred by PJM to evaluate the submitted proposal, and, if the proposal is submitted with a cost estimate above \$5 million, a \$5,000 non-refundable deposit that will be fully credited to the actual proposal study costs incurred by PJM. PJM requested an effective date of May 27, 2020.

On March 25, 2020, in Docket No. ER20-1392, PJM filed a limited-time blanket waiver of certain generator interconnection-related deadlines under the PJM Tariff in order to allow New Service Customers, Interconnected Transmission Owners, and PJM additional time to meet those deadlines in light of the ongoing National Emergency that has been declared due to the Novel Coronavirus Disease.

On March 25, 2020, in Docket Nos. EL16-49, EL18-178 and ER18-1314-004, PJM submitted a correction to the Brattle report that was included in its March 18, 2020 compliance filing. The purpose of this correction is make clear that the Hope Creek nuclear plant will be treated as a multi-unit nuclear plant for purposes of theMOPR application.

On March 18, 2020, in Docket No. ER19-2282-001, PJM and the NYISO filed a compliance filing to establish an April 7, 2020 effective date for NYISO/PJM Joint Operating Agreement revisions implementing entitlement rules for M2M coordination in

accordance with the letter order issued on August 28, 2019, and the January 23, 2020 Notice of Extension of Time.

On March 18, 2020, in Docket Nos. ER18-1314-003, EL16-49, and EL18-178, PJM submitted, in compliance with the Commission's December 19, 2019 order, a compliance filing concerning the MOPR, a request for waiver of the RPM auction deadlines and a request for an extended comment period of at least 35 days. The compliance filing contains revisions to the PJM Tariff to modify the application of the MOPR to address State Subsidies. PJM will await a Commission Order before implementing the modified rules. A separate link is provided for the Excel spreadsheet containing the calculations for the default MOPR values.

On March 13, 2020, in Docket Nos. ER20-939, ER20-942 and ER20-944, PJM submitted a motion to leave to answer and answer to comments filed in response to PJM's and MISO's February 3, 2020 filings submitted in compliance with the Commission's September 19, 2019 Order relative to the RTO's Affected System coordination processes requiring revisions to the MISO-PJM JOA and PJM Tariff.

On March 12, 2020, in Docket No. ER20-1258, PJM submitted proposed revisions to PJM Tariff, Schedule 12-Appendix A to incorporate cost responsibility assignments for 41 baseline upgrades included in the recent update to the Regional Transmission Expansion Plan approved by the PJM Board of Managers on February 11, 2020. PJM requested an effective date of June 10, 2020, which is 90 days after the date of this filing to allow a 30 day comment period.

On March 9, 2020, in Docket No. ER20-955, PJM submitted an answer in response to the February 25, 2020 protest of the Independent Market Monitor pertaining to PJM's filing containing clarifications to the application of Parameter Limited Schedule