

Governing Document Enhancement & Clarifications Subcommittee (GDECS) First Read of Proposed Revisions

Janell Fabiano
Markets & Reliability Committee
November 17, 2021

Remove [Tariff, Attachment DD, section 6.2\(c\)](#) in its entirety

Reasoning:

- Tariff sections referenced in this language no longer require PJM to file any reports with the Commission.
- FERC recently affirmed PJM's position that this section of the Tariff is no longer applicable and encouraged PJM to remove this provision as part of its next Tariff clean up filing.
- Reference: [Jackson Generation, LLC v. PJM Interconnection, L.L.C., 176 FERC ¶ 61,127 at P25 \(2021\)](#).

- October 1 - GDECS email notification
- October 1 – October 15 - GDECS vote open
- November 17 – First Read, MRC
- December 15 – Vote, MRC
- January – Vote, MC

GDECS Vote Result:
80% in Favor

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Appendix

- “The requirement in section 6.2(c) of attachment DD to the Tariff to file a report detailing any determinations made pursuant to sections 5.14(h), 6.5(a)(ii), or 6.7(c) of attachment DD is only applicable to the mitigation determinations that are ‘identified in such sections as subject to the procedures of [section 6.2(c)].’ Sections 5.14(h), 6.5(a)(ii), and 6.7(c) no longer state that they are subject to the procedures of section 6.2(c), and accordingly, PJM was not required to file a report.” P23
- “It is not an oversight that sections 5.14(h), 6.5(a)(ii), and 6.7(c) are now void of references to section 6.2(c).” P24
- “We note that PJM has suggested that it could remove this provision as part of its next Tariff clean up filing. We encourage PJM to do so as this would clarify PJM’s obligations.” P25