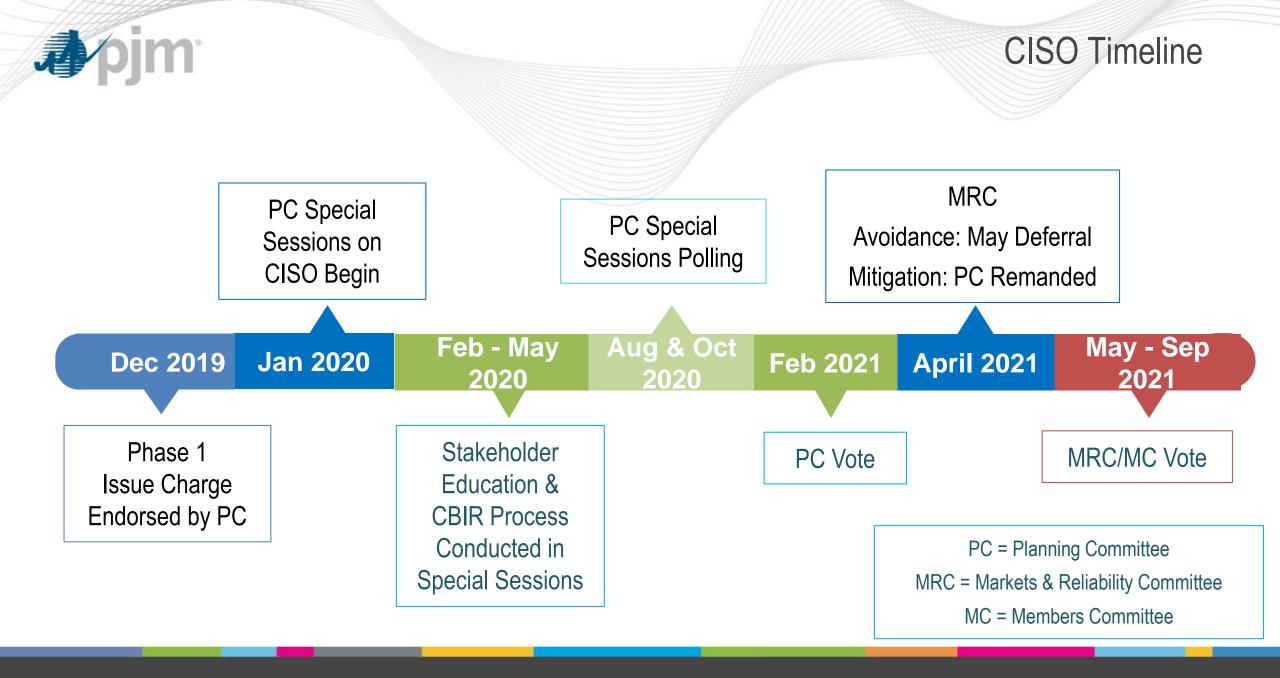


Critical Infrastructure Stakeholder Oversight

Michael Herman Planning Committee July 13, 2021





Critical Substation Planning Analysis Project

- "Critical Substation Planning Analysis Project" or "CSPA Project" shall be defined to mean a Regional RTEP Project or Subregional RTEP Project (1) with an anticipated in-service date of more than three years but no more than five years from the year in which the Office of the Interconnection identifies the need for the potential CSPA Project and (2) which is identified, developed, and selected by the Office of the Interconnection as the more efficient or cost-effective solution to address potential reliability violations stemming from the contingency loss of a critical substation, as set forth in Operating Agreement, Schedule 6, section 1.5.11(b). Such violations are based upon NERC Reliability Standard TPL-001 (referred to as "extreme events"). Prior to termination of Tariff, Attachment M-4, a CSPA Project shall be considered only to mitigate substations for which Tariff, Attachment M-4 is inapplicable.
- PJM recommending to remove the language in red



Design Component 2: Transparency with respect to CMP

 A project that falls under current PJM competitive window rules (exempted less than 200kV, substation equipment and immediate need) will be open to competition as part of an RFP process if the mitigating solution does not disclose the substation associated with the substation contingency. Full details of the solution to be published following completion of construction.

Design Component 3a: Competitive Process & Design Component 9b: Process for Identified Facilities

To the extent the PJM recommended transmission enhancement or expansion would be available for competition <u>under current PJM competitive window rules</u> (exempted less than 200kV, substation equipment and immediate need), the project will be open to competition as part of an RFP process if the mitigating solution does not disclose the substation associated with the substation contingency. Any recommended transmission enhancement or expansion, under these provisions, which includes component(s) that require public disclosure of siting prior to completing construction may only proceed in states where confidentiality provisions allow restricting access to information associated with the need driving the recommended transmission enhancement or expansion to the state commission and commission staff.



1.5.11 Critical Substation Planning Analysis Project Process

- (f)(1) The Office of the Interconnection determines that including the proposed CSPA Project in an RFP proposal window process would publicly disclose the location of or vulnerabilities associated with the critical substation contingencies and associated facilities (an example includes, but is not limited to, disclosure of rerouting an existing line(s) associated with a critical substation). However, if the Office of the Interconnection determines that any component of such CSPA Project can be included in an RFP proposal window without disclosing the location of or vulnerabilities associated with the critical substation contingencies and associated facilities, the Office of the Interconnection may include those project components in an RFP window; or
- *PJM recommending to keep the language in red*



Design Component 3a: Competitive Process & Design Component 9b: Process for Identified Facilities

To the extent the PJM recommended transmission enhancement or expansion would be available for competition under current PJM competitive window rules (exempted less than 200kV, substation equipment and immediate need), the project will be open to competition as part of an RFP process if the mitigating solution does not disclose the substation associated with the substation contingency. Any recommended transmission enhancement or expansion, under these provisions, which includes component(s) that require public disclosure of siting prior to completing construction may only proceed in states where confidentiality provisions allow restricting access to information associated with the need driving the recommended transmission enhancement or expansion and commission staff.



Next Steps

- Conduct a PC stakeholder vote at July Planning Committee meeting to ensure OA language reflects the CISO Mitigation Package.
 - Affirmative Vote Question: "Does the <u>amended</u> draft Operating Agreement Language reflect the CISO Mitigation Package approved at the February 9, 2021 Planning Committee?"



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