



PJM's Request for Rehearing/Clarification

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Jan. 28, 2020



PJM's Rehearing Request and Compliance Plan

Items in PJM's Rehearing	Items in PJM's Compliance Filing
Self-Supply Exemption	No
Exclude Energy Efficiency From MOPR	No
Exclude Resources Whose Primary Purpose is Not Electric Generation From MOPR	No
Materiality Thresholds (i.e., 20MWs or value of subsidy less than 1% of annual revenues)	No
Exclude Resources Generating Voluntary RECs From MOPR	Yes – with certification that RECs used only to meet voluntary obligations
Defer Development of Default Floor Prices for Resources Whose Primary Purpose is Not Electric Generation	Yes – unit-specific determination



PJM's Clarification Request and Compliance Plan

Items in PJM's Clarification	Items in PJM's Compliance Filing
Any Interconnection Construction Service Agreement or Equivalent Agreement Executed Prior to 12/19/2019 Qualifies Under Existing Exemptions	Exempt ISA, ICSA, WMPA, and Interim ISA Prior to December 19, 2019
State Subsidy Excludes RGGI and Default Service Procurement Programs	Excluded from State Subsidy Definition
Maintain Existing IMM Roles for Unit-Specific Review	Yes
Resource Receiving Both Federal and State Subsidies are Subject to MOPR, but Retains Benefit of Federal Subsidy in Unit Specific Reviews	Yes
Flexibility in Developing MOPR Price for Energy Efficiency	Yes

- PJM must comply with the directives set forth in the December 19 Order - irrespective of the pending rehearing requests.
- Stakeholder discussions will help inform PJM's compliance filing in determining whether additional compliance modifications are necessary.
- PJM's compliance filing, including any modifications, must be consistent with the December 19 Order's intended outcome - unless unworkable.