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PJM Package for Avoidance - Critical Infrastructure Stakeholder Oversight

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PC Special Session - Critical
Infrastructure Stakeholder Oversight

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- Avoidance is different than Mitigation
- Avoidance is not subject to CIP-014 standard
- Avoidance solution must balance transparency and risk to include the appropriate level of confidentiality requirements.

- Resilience Driver/Criteria Analysis
 - PJM will perform RTEP Resilience criteria analysis, utilizing the cascading trees tool, to attempt to avoid the creation of any new CIP-014 facilities via the RTEP Process.
- Metrics/Measurements/Factors
 - Consistent with RTEP Resilience criteria analytical methods incorporated in cascading trees tool software.
- Sensitivity Testing
 - Consistent with analysis methods as indicated in the resilience criteria analysis described above.

- Communication Procedures
 - If a proposed project violates PJM's Resilience criteria, PJM will communicate this failure, by way of a verbal update, to the entity who submitted the project proposal. Information is limited to analytical results only.

- Transparency
 - PJM will communicate the failure of a proposed project to meet RTEP Resilience criteria requirements
 - If a project proposal violates PJM's Resilience criteria, PJM shall provide limited/restricted level of information to entity proposing project through the competitive window.

- Competition
 - PJM's competitive Planning Process (Order 1000 Proposal windows) will continue to be the avenue for competition.
 - Proposing entities retain ability to mitigate initial issue identified in competitive process.
 - No opportunity to revise a proposal submitted through a competitive window to address issues that trigger potential violations associated with the Resilience criteria. (Status Quo)
 - Failure of resilience criteria analysis will be treated the same as failure of existing reliability criteria.

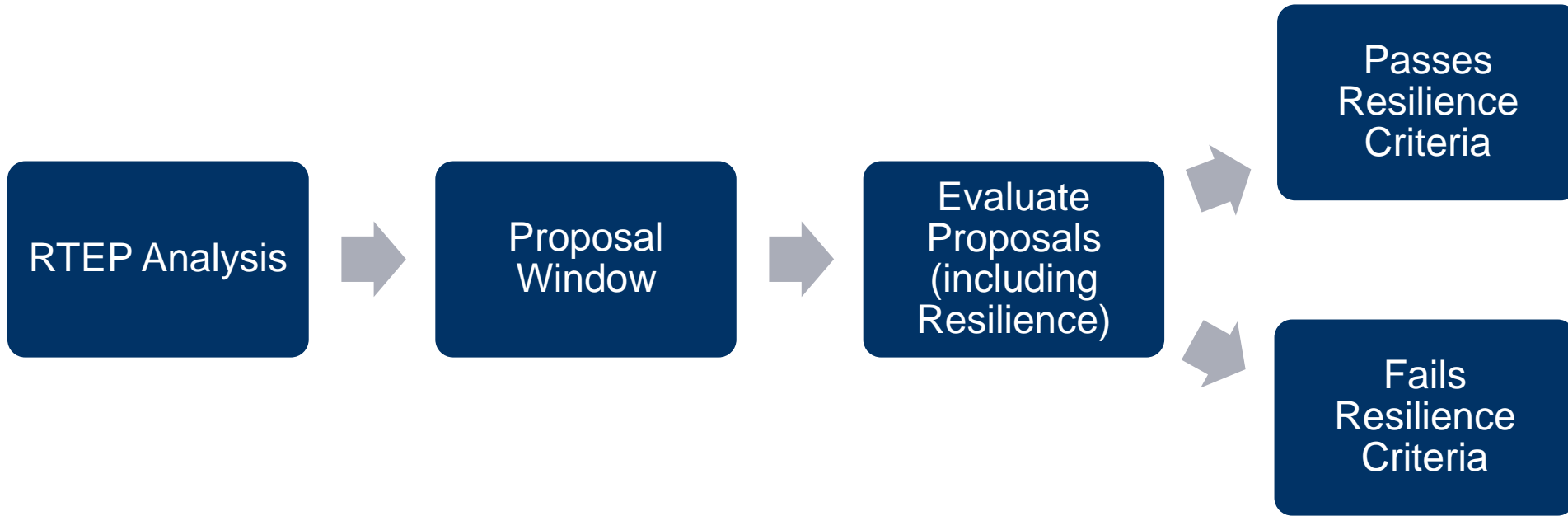
- Confidentiality
 - If project proposal violates PJM's Resilience criteria, PJM shall provide limited/restricted level of information to project proposal.
- CEII – Status Quo
- Re-evaluation Process – N/A
- Cost Allocation/Cost Recovery – Status Quo

Entity	Role/Responsibility
PJM	Performs RTEP Resilience criteria analysis with cascading trees tool. Communicates information in accordance with confidentiality requirements as described above. E.g., release limited/restricted level of information to proposing entity.
State Commissioners	Provide feedback consistent with the confidentiality provisions in the Operating Agreement
PJM Stakeholders	Status Quo with limited/restricted level of communications to entity proposing project triggering potential violations of PJM's RTEP Resilience criteria.
Asset Owners	Status quo with limited/restricted level of communications to entity proposing project triggering potential violation of PJM's RTEP Resilience criteria.

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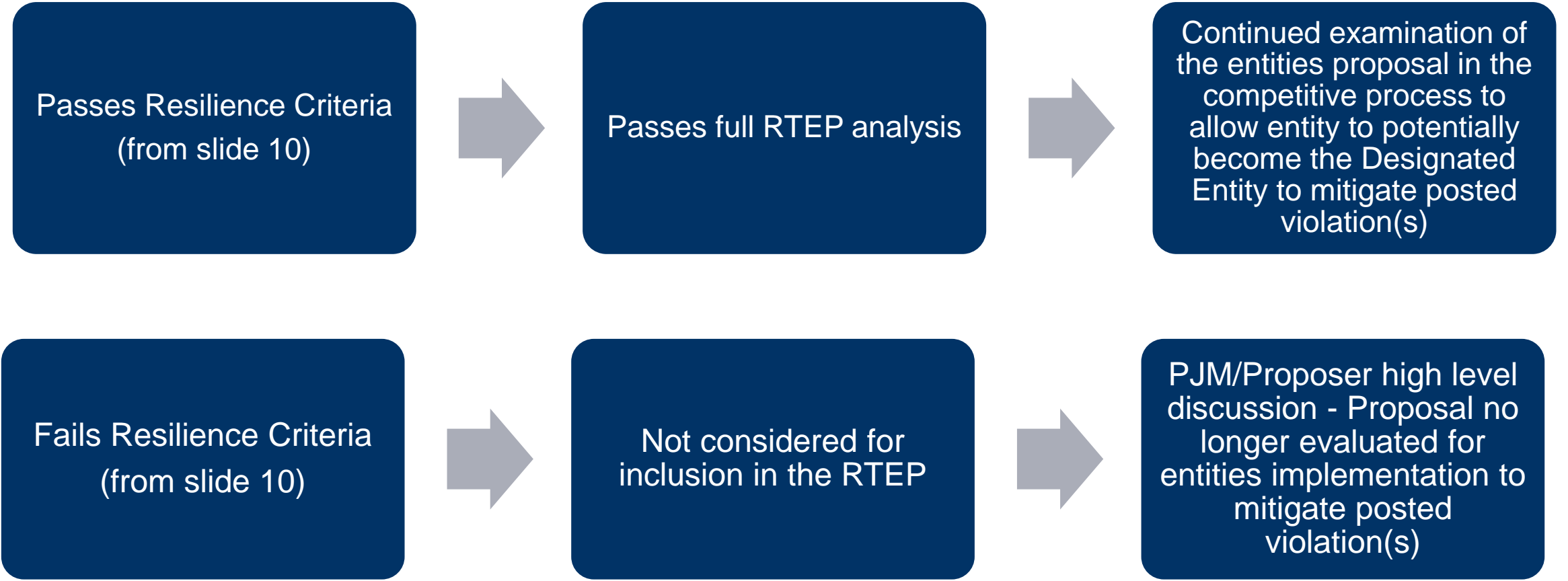
Examples

Process Example



Note: For the purposes of this example we are focusing on Resilience Criteria, but please note this example is applicable to all RTEP criteria

Process Example



- Questions?