**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Recommendations:** 2015 WEQ Annual Plan Item 7.a – Provide for a one-day requirement for posting Available Transfer Capability narratives

**Submitted By:** PJM Interconnection, LLC

**Date:** April 3, 2015

PJM Interconnection, LLC appreciates and thanks the OASIS Subcommittee for their work on Annual Plan Item 7 specific to 7a, 7b and 7d.

PJM is providing comments specific to 7a for which we urge the subcommittee to include the following additional requirement points in both 001-14.1.3 and 001-15.1.2.

Transmission Provider shall track compliance with the posting deadline and post its compliance on the OASIS.  If a Transmission Provider fails to post by 23:59:59 local time, the day following the change of ATC to zero, it shall count that posting as late.  The Transmission Provider shall track the number of days late each report is posted.  The Transmission Provider shall calculate “late days” as the sum of the number of days each report is late. If the total number of late reports exceeds 2 or the total late days exceed 3 in a calendar quarter for two consecutive quarters, the Transmission Provider is required to submit a notification filing with the Commission. The notification must be filed within 30 days of the end of the second calendar quarter of such event. The notification must include the total number of late reports, total number of late days and the reason each report was late.

The quarter after such notification, the Transmission Provider will be required to post on the OASIS:  the total number of late reports, the total number of late days and the reason the reports were posted late.  These metrics are not required to be posted if the Commission concludes the delay in the notification was due to extenuating circumstances.

Thank you for your review and consideration.

Cathy Wesley