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DATE: July 25, 2022
TO: PJM Market Participants
FROM: PJM Market Monitoring Unit (MMU)
SUBJECT: PA RGGI Integration Status and Cost-Based Offers

Legal actions have affected the integration of Pennsylvania into Regional Greenhouse Gas Initiative (RGGI) and therefore affected the ability of generators to include RGGI costs in their cost-based offers in the PJM energy market. These are the related market messages posted by the MMU to date. The prior market messages have been superseded by the July 25 market message.

The July 25 market message is in effect until further action by the courts.

- July 1, 2022: Pennsylvania joined RGGI. As a result generators could include RGGI costs in their cost-based offers per their approved Fuel Cost Policies.
- July 8, 2022: The Commonwealth Court of Pennsylvania issued a preliminary injunction enjoining Pennsylvania from implementing and enforcing Pennsylvania's CO₂ Budget Trading Program, the basis for Pennsylvania's membership in RGGI. As a result generators could not include RGGI costs in their cost-based offers effective beginning on Saturday, July 9, for Sunday July 10, unless and until Pennsylvania is allowed by the courts to implement and enforce Pennsylvania's CO₂ Budget Trading Program.
- July 11, 2022: Governor Wolf's administration appealed the injunction to the PA State Supreme Court, effectively lifting the injunction. As a result, generators can include RGGI costs in their cost-based offers per their approved Fuel Cost Policies beginning on July 13 for July 14 unless and until the injunction is reinstated, if it is.
- **July 25, 2022: The Commonwealth Court of Pennsylvania reinstated its July 8 preliminary injunction enjoining Pennsylvania from implementing and enforcing Pennsylvania's CO₂ Budget Trading Program, the basis for Pennsylvania's membership in RGGI. As a result, generators cannot include RGGI costs in their cost-based offers effective beginning on Tuesday, July 26, for Wednesday, July 27, unless and until Pennsylvania is allowed by the courts to implement and enforce Pennsylvania's CO₂ Budget Trading Program.**

Please contact the MMU (MMU_Energy_Offers_Review@monitoringanalytics.com) if you have any questions.