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**DATE:** July 13, 2022  
**TO:** PJM Market Participants  
**FROM:** PJM Market Monitoring Unit (MMU)  
**SUBJECT:** PA RGGI Integration Status and Cost-Based Offers

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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:

- 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 CO<sub>2</sub> 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 CO<sub>2</sub> 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.

Please contact the MMU (MMU\_Energy\_Offers\_Review@monitoringanalytics.com) if you have any questions.