



Organization of PJM States, Inc. (OPSI)

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March 12, 2021
Via Electronic Delivery Only

Charles Robinson
Chair, PJM Nominating Committee
PJM Interconnection LLC
2750 Monroe Boulevard
Audubon, Pennsylvania 19408

Dear Mr. Robinson and Nominating Committee,

With two open seats to fill this year, the PJM Board of Managers (“Board”) has an opportunity to broaden its diversity of expertise by selecting one or more candidates with state regulatory experience. The availability of open seats provides the opportunity to add to the skills and experience necessary for a Board overseeing a vital public utility industry undergoing unprecedented change driven largely by public policy mandates. Having individuals on the Board with firsthand knowledge of the need for fair balancing of interests faced by regulators entrusted with implementing public policy directives should be a priority. OPSI acknowledges that PJM has a well-rounded and impressively qualified Board, but addition of one or more members with regulatory experience is necessary.

OPSI notes that PJM’s announcement of the Board openings included a “PJM Board-Position Profile” in which PJM stated that a “preferred candidate may have expertise and experience in public utilities laws and regulations,” or prior “day to day experience in state or federal regulation; possibly a former state or federal public utility regulatory commissioner.” Unfortunately, we believe these criteria fall short for the current Board needs and selection process.

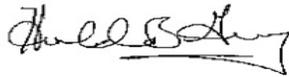
First, OPSI firmly believes that requiring at least one Board member to have experience in state public utility regulation is necessary and will provide critical perspective currently lacking within the Board, which regularly faces a wide range of decisions having a potential impact upon 65 million retail customers that rely on PJM electric markets and transmission. PJM would not be unique to require this of its

Board, as other regional transmission organizations or independent system operators have already included such background on their respective boards.¹

Second, OPSI recommends that PJM maximize the number of new voting Board members that reside within the PJM service area. OPSI does not suggest that PJM ignore the large pool of candidates residing outside its footprint, as the diversity and expertise of current PJM Board members provides great value to the company. OPSI believes, however, that building a consistent presence on the Board from within the PJM service area would add vital understanding of state policies and issues within the PJM footprint.

As you deliberate and ultimately decide upon qualified candidates for the next members of the PJM Board of Managers, now and moving forward, we urge you to consider the fundamental improvements that OPSI's two recommendations would provide, and to nominate accordingly.²

Sincerely,

A handwritten signature in black ink, appearing to read "Harold B. Gray", with a horizontal line underneath the name.

Harold B. Gray, President
Organization of PJM States, Inc.

¹ The respective Boards of Directors for (1) the Midcontinent ISO includes Nancy Lange, former Chair of the Minnesota Public Utilities Commission; (2) ISO New England includes Mark Vannoy, former Chairman of the Maine Public Utilities Commission; (3) the Southwest Power Pool includes Joshua W. Martin, former Chairman of the Delaware Public Service Commission; (4) New York ISO includes Ave M. Bie, former Chair of the Wisconsin Public Service Commission; and (5) Electric Reliability Council of Texas requires the Chair of the Public Utility Commission of Texas to sit on the Board as a non-voting *ex officio* member.

² Approved by the full OPSI Board on March 12, 2021 with the Kentucky Public Service Commission abstaining.