



Mark Takahashi
Chair, PJM Board of Managers

2750 Monroe Blvd.
Audubon, PA 19403

VIA ELECTRONIC DELIVERY

April 17, 2024

Kent A. Chandler
President, Organization of PJM States, Inc.
Chairman, Kentucky Public Service Commission

Dear Chairman Chandler,

Thank you for your correspondence dated April 3, 2024 (OPSI Letter), wherein you discuss concerns associated with the transmission owner initiative to revise the Consolidated Transmission Owners Agreement (CTOA) and to move the PJM planning protocol from the PJM Operating Agreement (OA) into the Open Access Transmission Tariff (Tariff). The OPSI Letter sets forth concerns related to both the proposed revisions to the CTOA and to the process for amending the OA to accomplish the moving of the planning protocol to the Tariff.

The PJM Board appreciates OPSI's input. As to OPSI's concerns regarding the proposed CTOA revisions, the PJM Board will evaluate those concerns in light of the most recently posted CTOA revisions.

The PJM Board shares OPSI's concerns about following a defined process to amend the OA. While the CTOA is a foundational governing document, the OA is also a foundational governing document. As such, an attempt should be made to amend the OA by a vote of the Members Committee.

Accordingly, the PJM Board respectfully invokes OA, section 7.7(v) and states its intent to submit to the Members Committee proposed amendments to the OA that would serve to move Schedule 6 (including Schedules 6-A and 6-B) of the OA to the Tariff along with any necessary conforming OA and Tariff changes; and with the understanding that CTOA revisions, pursuant to the CTOA amendment process, will be needed to effectuate a potential affirmative vote of the Members to move Schedule 6 (including Schedules 6-A and 6-B).

The PJM Board respectfully requests that the Members vote on the proposed OA amendments in a timely manner as the PJM Board expects to gather comments and discuss this matter at its next Board meeting, scheduled to occur immediately after the PJM Annual Meeting.

We thank OPSI for its thoughtful correspondence, and we thank the Members in advance for carrying through on the Board's request to evaluate and vote on potential OA amendments.

Sincerely,

Mark Takahashi
Chair, PJM Board of Managers