

December 29, 2025

Mr. David Mills
Chair, PJM Board of Managers
2750 Monroe Blvd.
Audubon, PA 19403
*via electronic delivery

Dear Chairman Mills and Members of the PJM Board of Managers,

First, I would like to reiterate the appreciation for the Critical Issue Fast Path-Large Load Additions (CIFP-LLA) process that was initiated by the Board on August 8, 2025. The process was expedited, but very thorough. Items moved quickly, and the level of engagement and analysis reflected the seriousness with which PJM approached this effort. My apologies for providing this input so late in the process, yet, I thought it still might provide helpful insight for your ongoing review.

As you continue to deliberate, I need to bring one concern, and perhaps, a misunderstanding about the voting on November 19 to your attention.¹ This clarification relates specifically to the Southern Maryland Electric Cooperative (SMECO) Price Responsive Demand (PRD) proposal. The posted documents relating to the SMECO package focused solely on providing modifications to the PRD components of the PJM proposal. However, SMECO's posted materials and the final presentation, perhaps, provided two different pictures. The final SMECO presentations on November 19 may suggest that SMECO's proposal was providing changes to the PRD components of the PJM proposal AND adopting the remaining components of PJM's proposal. That was not the understanding the consumer advocates had when voting on November 19th.

SMECO's posted final meeting materials only address demand response components of the CIFP process. SMECO specifically did not take any position on other aspects of PJM's package - supporting or rejecting - in their posted materials.² For example, the SMECO proposal incorporated into the final Excel "Options and Packages" matrix narrowly focuses on the demand response topic.³

¹ Given the expedited nature of the CIFP process, I am not aware of another appropriate or timely avenue to communicate this matter, and therefore offer it here for your consideration.

² See Special MC – Critical Issue Fast Path – Large Load Additions, November 19, 2025 posting: Item 01L – SMECO PRD package – Executive Summary. (The SMECO PRD package only mentions the PRD components of the PJM package.) In addition, see also Item 3 – Critical Issue Fast Path – Large Load Additions – Options and Package Matrix: Tab 3. "Package Matrix"; Column N "SMECO PRD"

³ See Special MC – Critical Issue Fast Path – Large Load Additions, November 19, 2025 posting: Item 3 – Critical Issue Fast Path – Large Load Additions – Options and Package Matrix: Tab 3, Column N "SMECO PRD". Overall, the PJM Matrix includes fourteen categories of design components and over seventy actual design components. The only category SMECO addressed in the matrix was the six design components of the "demand response" category. SMECO's position for the other 13 categories of design components were all described as "N/A" - not applicable.

As you are aware, in my role as Executive Director of the Consumer Advocates of the PJM States (CAPS), my responsibility is to provide support and recommendations on voting matters to the Consumer Advocates. With respect to the November 19th Special Members Committee vote on the SMECO PRD proposal, my recommendation to the Consumer Advocate offices was to support the SMECO PRD proposal. My recommendation to support the SMECO PRD proposal included the understanding that it was a stand-alone recommendation on the PRD proposal. The SMECO PRD proposal seemed like a reasonable set of modifications to the PJM PRD proposal – or any other PRD proposal – under the circumstances.

More broadly, my recommendations to the Consumer Advocates consistently emphasized that the PJM proposal had some good ideas, yet, it does not, in any way, ensure reliability moving forward. Ensuring reliability was the core objective of the CIFP process, as outlined in the August 8th correspondence from the PJM Board.⁴ The addition of the PRD proposal to the PJM proposal does not, in my assessment, resolve or meaningfully address the fundamental concerns of the PJM proposal regarding reliability or affordability for the residential consumers in the region.⁵

Again, thanks for your efforts, consideration and most importantly your prioritization of this critical issue as it relates to the affordability and reliability of electricity in our region.

Respectfully submitted,



Greg Poulos,
Executive Director,
Consumer Advocates of the PJM States (CAPS)

⁴ PJM Board Letter re Implementation of Critical Issue Fast Path Process for Large Load Additions, August 8, 2025, page 2, item 1 (Resource Adequacy: The Board desires development of reliability-focused solutions to ensure large loads can continue to be integrated rapidly and reliably, without causing resource inadequacy....)

⁵A PRD package is unlikely to provide a material impact to the reliability and affordability of the PJM package – or any other package. In the latest auction for the 2027/2028 delivery year, 106.5 MW of PRD resources were offered and cleared. (see PJM 2027/2028 Base Residual Auction Report, December 17, 2025, page 12.)