



# CONSUMER ADVOCATES OF THE PJM STATES

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February 10, 2021

## **VIA ELECTRONIC DELIVERY**

The PJM Board of Managers  
c/o Ake Almgren, Ph.D., Chairman  
PJM Interconnection, L.L.C.  
PO Box 1525  
Southeastern, PA 19399-1525

Manu Asthana  
President and Chief Executive Officer  
PJM Interconnection, LLC  
PO Box 1525  
Southeastern, PA 19399-1525

Dear Chairman Almgren, the PJM Board of Managers, and Mr. Asthana:

We have come to understand that, on at least two occasions, PJM has entered into common interest and non-disclosure agreements for maintaining confidentiality of some of its communications with transmission owners and has not provided these agreements to PJM members and the public. We are writing with our preliminary concerns about this confidentiality in what otherwise is PJM's public process that effects millions of utility consumers, many of whom we represent.

We know that transparency and independence are valued by PJM and that PJM is required to maintain independence from any particular stakeholder group. We are inquiring about this matter at a time when wholesale transmission costs have increased by almost forty-five percent in the last five years. This increase in costs to consumers is coincidentally happening as PJM has relinquished more and more of its oversight role in planning the grid of the future.

On multiple occasions, including December 23, 2020, Greg Poulos, the executive director of the Consumer Advocates of the PJM States (CAPS) requested copies of the common interest agreements that PJM maintains with certain transmission owners. To date, PJM has declined to provide those agreements. In particular, we understand one of the agreements was signed in 2011 and another agreement was signed in 2017. Therefore, we are asking PJM's Board to require all the currently existing agreements (and any future such agreements) be released to the public domain.

By allowing public access to the common interest agreements, PJM could allay concerns about its independence on issues involving the subject of the agreements, and would be providing transparency.

Thank you for your consideration.

Very truly yours,



William F. Fields  
President