



Enhanced Know Your Customer (KYC)

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March 19, 2024

- Scope focuses on reevaluating and expanding the current definition of Principal
 - Definition in PJM Tariff and Operating Agreement currently focuses on Officers or Senior Managers of the company
 - Expand definition to include others with ownership or substantial control of the company

"Principal" shall mean:

- i. the chief executive officer or senior manager that controls or directs strategy for the Participant,
- ii. the chief legal officer or general counsel,
- iii. the chief financial officer or senior manager that controls or directs the financial affairs and investments of the Participant,
- iv. the chief risk officer or senior manager responsible for managing commodity and derivatives market risks, and
- v. the officer or senior manager responsible for or to be responsible for transactions in the applicable PJM Markets.

PJM's definition of Principal focuses on specific roles/titles and does not include other individuals that have ownership interest in or substantial control of the Participant

FinCEN Customer Due Diligence 4 Pillars

- Identify and verify the identity of customers (CIP).
- Understand the nature and purpose of customer relationships to develop customer risk profiles.
- Identify and verify the identity of the beneficial owners of companies opening accounts.
- Conduct ongoing monitoring to identify and report suspicious transactions and, on a risk basis, to maintain and update customer information.

PJM seeks to lean on FinCEN 4 Pillars as framework for enhancements to PJM's KYC process.

- Adopting best practices from FinCEN standards and the Corporate Transparency Act (CTA) and tailoring them to PJM's needs
- Consideration for FinCEN best practices already adopted by other ISOs/RTOs
 - Inclusion of Beneficial Owners
 - Individuals with 10% or greater ownership interest in the company
 - Individuals who exercise substantial control over the company
 - Identity Verification
 - Providing copies of government issued identification

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