

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Appalachian Power Company,
PJM Interconnection, L.L.C.

Docket No.

ER20-841-000

COMMENTS OF
THE ORGANIZATION OF PJM STATES, INC.

Pursuant to Rule 212 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, and the Notice of Filing issued on January 17, 2020, establishing February 7, 2020, as the deadline for comments and protests in the above-captioned docket, the Organization of PJM States, Inc. ("OPSI")¹ respectfully submits the following comments regarding the proposed Attachment M-4 to the PJM Transmission, L.L.C. ("PJM") Open Access Transmission Tariff filed on January 17, 2020, by the PJM Transmission Owners in the above-captioned docket ("January 17 Filing"). OPSI requests the Commission find the January 17 Filing deficient.

¹ Approved unanimously by the OPSI Board on February 7, 2020.

I. INTRODUCTION

The proposed new Attachment M-4 sets forth unique planning procedures that the PJM Transmission Owners propose to apply to transmission project planning in PJM designed to mitigate the risk associated with critical transmission stations and substations identified pursuant to North American Electric Reliability Corporation (“NERC”) reliability standard CIP-014-2.

In the January 17 Filing, the PJM Transmission Owners explain that, while the physical security requirements of CIP-014 may reduce the risk of loss of a CIP-014 critical transmission station or substation, if such a loss nevertheless occurs, instability, uncontrolled separation, or cascading on the electric grid could result, with the associated loss of electric service.² The PJM Transmission Owners aim to mitigate those negative consequences through their proposal. The PJM Transmission Owners assert that the proposed CIP-014 Mitigation Projects (“CMPs”) “are Supplemental Projects under the PJM Operating Agreement.”³ The PJM Transmission Owners expect the planning process in Attachment M-4 to lead to CMPs that will result in existing CIP-014 critical transmission stations or substations no longer being critical under CIP-014, thus reducing the negative consequences associated with loss of the associated station or substation.⁴

The PJM Transmission Owners acknowledge that the Commission’s policy as set forth in Order No. 890 is that Transmission Owners must plan transmission expansions through open and transparent planning processes.⁵ The PJM Transmission Owners also explain why information about the location and identification of CIP-014 critical transmission stations and substations is highly sensitive and describe the potential consequences of losing such a station or substation.⁶

² January 17 Filing, at 10.

³ See, *e.g.*, January 17 Filing, at 11.

⁴ January 17 Filing, at 10.

⁵ January 17 Filing, at 20.

⁶ January 17 Filing, at 7-9.

The Transmission Owners conclude that “the standard non-disclosure agreements upon which PJM and the PJM Transmission Owners rely to protect Critical Energy Infrastructure Information are insufficient for general use to protect the highly sensitive information about CIP-014-2 critical transmission stations and substations.”⁷ Attachment M-4 represents the PJM Transmission Owners’ effort to balance the need to protect highly sensitive information pursuant to CIP-014-2 with the requirements for openness, transparency, and opportunity for stakeholder input typically associated with the transmission planning process.⁸ OPSI’s position is that the January 17 Filing is deficient, in that it fails to achieve an appropriate balance.

II. COMMENTS

FERC Order No. 890 requires that Transmission Owners plan transmission expansions through open and transparent public planning processes, with input opportunities for stakeholders, including electricity consumers and their representatives.⁹ NERC requires that the location and identification of CIP-014 stations and substations be kept confidential and protected from public disclosure.¹⁰ In developing a CMP planning process to mitigate the criticality of CIP-014 critical transmission stations or substations, these competing requirements must be recognized and balanced. OPSI’s position is that the Attachment M-4 project planning process should strive to maximize openness, transparency, and opportunity for stakeholder input into CMP planning subject to confidentiality constraints needed to protect facility security and system security. OPSI has concerns that the proposed tariff language as filed lacks basic elements required to meet this threshold as described herein.

⁷ January 17 Filing, at 9. OPSI takes no position on whether the CEII standards provide sufficient confidentiality for CMP projects.

⁸ January 17 Filing, at 6 and 20.

⁹ January 17 Filing, at 20.

¹⁰ January 17 Filing, at 3.

Because of the importance of ensuring that the location and identification of CIP-014 critical transmission stations or substations are not compromised, the opportunities for public openness and transparency, and opportunities for input from stakeholders into the CMP planning process are necessarily limited. Given the limited opportunities that stakeholders will have prior to the CMP in-service date to directly protect their own interests,¹¹ Attachment M-4 must include alternative provisions to accomplish the consumer protection objectives of the Federal Power Act. In this context, the roles of PJM, state commissions, and the Commission are central to ensuring that stakeholder interests, including electricity consumer interests, are protected. As drafted, Attachment M-4 unreasonably limits the role of PJM, state commissions, and the Commission in this regard. OPSI recommends that proposed Attachment M-4 only be approved with the modifications to Attachment M-4 recommended below.

A. PJM’s Independence Must Not Be Constrained.

The PJM Transmission Owners explain that all PJM Transmission Owners have named PJM as their unaffiliated third-party verifier under CIP-014.¹² The PJM Transmission Owners state that, “[w]ith a few exceptions, PJM’s role in the Attachment M-4 process is as the ‘unaffiliated third-party verifier’ under CIP-014.”¹³ This means that the Transmission Owners would identify potential CMPs and then submit them to PJM for review under Step 4 of the proposed Attachment M-4 process.¹⁴ The PJM Transmission Owners explain that one exception to PJM’s unaffiliated third-party verifier role in Attachment M-4 is where PJM “acts as the Transmission Provider that has been assigned reliability planning responsibility pursuant to

¹¹ See, e.g., January 17 Filing at 4 explaining that the normal Attachment M-3 planning process is “inherently incompatible with the security concerns surrounding CIP-014 facilities and plans to mitigate the risks associated with those facilities.”

¹² January 17 Filing, at note 24.

¹³ January 17 Filing, at note 24.

¹⁴ January 17 Filing, at 14-15.

[Consolidated Transmission Owner Agreement] § 4.1.4 and [Operating Agreement], Schedule 6 § 1.2(e)”¹⁵ and specifically cite the “do no harm” analysis,¹⁶ which, presumably, refers to PJM’s assessment in Step 4.B(v) of Attachment M-4 regarding whether a CMP will “result in reliability or operational performance criteria violations under the RTEP Process.”¹⁷

Because of the limited transparency associated with the proposed Attachment M-4 planning process, as compared to the Attachment M-3 planning process, which features extensive public meetings regarding assumptions, needs, and proposed solutions¹⁸ and extensive public posting of data and information by PJM, PJM’s role in the Attachment M-4 process must be expanded beyond PJM’s role in the Attachment M-3 process for Supplemental Projects. Insofar as CMPs are treated as Supplemental Projects, the Commission should confirm that reduced transparency associated with CMPs under Attachment M-4 requires more participation in planning by PJM as the independent transmission planner/advisor. In Step 4 of Attachment M-4 the Transmission Owners appear to recognize this need and attempt to provide an expanded role for PJM.

However, Step 4 of proposed Attachment M-4 unreasonably constrains PJM, precluding the independence necessary in fulfilling its role in the review, assessment, verification and reporting elements in Step 4. The Commission should find the January 17 Filing deficient since it fails to result in the PJM Transmission Owners’ stated balance objective. Rather, the PJM Transmission Owners’ proposed limits on PJM’s necessary independence in the transmission

¹⁵ January 17 Filing, at note 24.

¹⁶ January 17 Filing, at note 24.

¹⁷ See, January 17 Filing, Attachment B, Step 4.B(v).

¹⁸ January 17 Filing, at 5.

planning process would result in unjust and unreasonable rates. The Transmission Owners could approach the necessary balance by modifying Step 4A as recommended below:

A. PJM Review. Upon receiving the Preferred Solution and Potential Solutions from a Transmission Owner pursuant to Step 3 above, PJM (or consultants selected by PJM) shall evaluate those solutions. PJM shall report its findings to the Transmission Owner in writing and either: (i) ~~advise that the Preferred Solution is~~ **identify** the more efficient or cost effective solution from among the Preferred Solutions and Potential Solutions; (ii) suggest modifications to any of the Preferred Solution or Potential Solutions that will permit PJM to advise that one of them is the more efficient or cost effective solution; ~~or~~ (iii) **identify an alternative solution not among the Preferred or Potential Solutions as the more efficient or cost effective solution; or** (iv) advise that a CMP solution not be pursued. PJM's report of its findings shall include an explanation of the basis for its advice **findings and conclusions**.

These modifications would specifically allow PJM to identify and advise a CMP solution that is not among the Preferred and Potential Solutions proposed by the Transmission Owner.

Without these modifications to Step 4A of proposed Attachment M-4, PJM's options will be limited only to the set of Preferred and -Potential solutions submitted by the Transmission Owner. If PJM finds there is a potential solution that is more efficient or cost effective than any identified by the Transmission Owner, PJM must have the authority, and should have the obligation, to so advise the Transmission Owner and include such in the report of its findings provided to the relevant state commissions.

To better clarify the reliance on PJM's independence in the CMP review process, OPSI also recommends the following modifications to Step 4B:

PJM shall report its **independent** assessment of these factors to the Transmission Owner in writing. No CMP solution shall proceed to another step in the Attachment M-4 process until this Step 4 has been completed. ~~Once PJM and the Transmission Owner have agreed that the~~ **shall submit its independent assessment** report is final, PJM's report will be provided to the affected State Commission(s), at that agency's option.

These modifications specify that PJM’s assessment must be independent and not unduly influenced or limited by the Transmission Owner or any market participant. As filed by the PJM Transmission Owners, PJM would be prohibited from providing its review and assessment report under Step 4 until the relevant Transmission Owner has “agreed.”¹⁹ This condition provides the Transmission Owner with undue power over both the content of PJM’s report as well as the timing of its provision to the relevant state commission(s). Indeed, if the Transmission Owner withholds its agreement, the relevant state commission(s) could be prevented from receiving PJM’s report. That kind of blocking action would constitute an inappropriate infringement on PJM’s independence, and represents an improper opportunity for the Transmission Owner to impede a state commission’s receipt of necessary data and information. As an “unaffiliated third-party verifier,” PJM’s review must be objective and independent, and conducted on PJM’s timeline, not on that of the Transmission Owner. Similarly, the submission of PJM’s report to the affected state commissions should proceed apace and not be subject to veto by the affected Transmission Owner.

B. State Jurisdiction Must Be Respected and State Commissions’ Role in Representing the Public Interest Must Not Be Constrained.

The PJM Transmission Owners state that, to avoid unnecessarily exposing highly sensitive information about CIP-014-2 critical transmission stations and substations to public disclosure, their proposed Attachment M-4 process would allow the PJM Transmission Owners to plan CMPs through a confidential process “in consultation with PJM and the affected state commissions without publicly divulging information about the critical transmission station or substation.”²⁰ The Transmission Owners state that their “proposed Attachment M-4 provides as

¹⁹ January 17 Filing, Attachment B, Step 4B.

²⁰ January 17 Filing, at 13 (emphasis added).

much transparency during the planning process as can reasonably be achieved without risking widespread disclosure of information concerning CIP-014-2 critical transmission stations and substations.”²¹ The PJM Transmission Owners conclude that Attachment M-4 will “achieve an appropriate balance between (1) the security concerns driving the need for information protection and (2) the requirements of Order No. 890 that stakeholders have visibility into the PJM Transmission Owners’ proposed transmission projects.”²²

The PJM Transmission Owners imply that their proposed Attachment M-4 planning process satisfies Order No. 890’s stakeholder visibility requirements because, potentially among other things, the “affected state commission” will have an opportunity for consultations regarding the planning process for CMPs. While OPSI recognizes the PJM Transmission Owners’ intent to comply with Order No. 890, one purpose for the consultation opportunities in Steps 5 and 6 of Attachment M-4 is to reflect state commissions’ public interest objectives.

Similarly, the PJM Transmission Owners assert that they “are responsible for addressing planning procedures”²³ for CMPs because CMPs “are Supplemental Projects under the PJM Operating Agreement.”²⁴ The PJM Transmission Owners state that CMPs would be Supplemental Projects under the PJM Operating Agreement because “they are not required for system reliability, operational performance, economic criteria or individual state public policy purposes.”²⁵ OPSI takes no position herein on whether CMP projects are or should be Supplemental Projects, or whether the PJM Transmission Owners should be responsible for planning CMP projects.

²¹ January 17 Filing, at 19.

²² January 17 Filing, at 20.

²³ January 17 Filing, at 11.

²⁴ January 17 Filing, at 11.

²⁵ January 17 Filing, at 10.

The issue that OPSI takes is that, as filed, the PJM Transmission Owners' Attachment M-4 would allow consultations between a Transmission Owner/PJM and the affected state commission at the sole discretion of the Transmission Owner. State commissions would only receive consultation from the Transmission Owner or PJM "if and to the extent that the Transmission Owner can ensure that such consultations and information will be subject to such appropriate confidential safeguards."²⁶ The January 17 Filing is deficient in demonstrating how the Transmission Owners would rely on the inclusivity of state commissions in their quest for balance in the CMP planning process, yet have the ability to unilaterally determine if a state commission should be informed or consulted.

State commissions are routinely responsible for protecting sensitive and confidential information and applying the necessary safeguards.²⁷ The Commission itself briefs state commissions on matters that are sensitive or confidential as the need arises. Under no circumstance would it be appropriate, just or reasonable to allow a Transmission Owner to be the judge of a state commission's capability to protect confidential material, particularly material affecting that state's regulated utilities or ratepayers. OPSI objects to any attempt to do so. Indeed, given the lack of transparency associated with the CMP planning under proposed Attachment M-4, and absence of stakeholders' opportunities to provide input into CMP planning, state commissions' role in representing the public interest is particularly critical. It would be manifestly unjust and unreasonable to permit a Transmission Owner to preclude an

²⁶ January 17 Filing, Attachment B, Step 5.

²⁷ Many state commissions are subject to statutes that address the safeguard of sensitive information or mirror Confidentiality Exemptions 3 and 7(F) of the Freedom of Information Act (5 U.S.C. 552b(3) and (7)(F)). For example, the New Jersey Board of Public Utilities is able to provide confidentiality through exemptions to the Open Public Records Act (N.J.S.A. § 47:1A-1) or even go beyond the type required for the proposed CMP process, employing staff with Department of Homeland Security clearances to handle classified information. Similarly, the Illinois Commerce Commission may accord confidential treatment to information that companies are required to submit and that would otherwise be deemed public (220 ILCS 5/4-402 and 5/5-108).

affected state commission from receiving consultation on CMPs within its jurisdiction.

Accordingly, OPSI recommends the following modifications to Step 5:

5. Consultation with State Commissions. ~~The Transmission Owner shall ensure that all consultations with a State Commission as set forth in this Step 5, are~~ **and information exchanged therein, shall be** subject to appropriate confidential safeguards. ~~The Transmission Owner shall only be required to engage in consultations with a State Commission with respect to the planning and construction of a CMP under Step 5 and the Transmission Owner and PJM shall only consult with or provide information to a State Commission under Steps 5 or 6, if and to the extent that the Transmission Owner can ensure that such consultations and information will be subject to such appropriate confidential safeguards.~~

Similarly, OPSI recommends the following modifications to Step 6:

6. PJM Interim/Periodic Review and Interim Consultation with State Commissions. Nothing in this Attachment M-4 precludes PJM, at its sole discretion, from conducting additional periodic examinations to verify the continuing validity of its findings and assessment under Step 4, above. Similarly, nothing in this Attachment M-4 precludes PJM from consulting with State Commissions in addition to those consultations specified in Step 5 above, with or without the participation of the relevant Transmission Owner. **The consultations**

in this Step 6, and information exchanged therein, shall be subject to appropriate confidential safeguards.

These modifications would remove the Transmission Owners' proposal to wield sole discretion regarding consultations under Steps 5 and 6. These modifications allow a state commission the option of ensuring that it receives consultation about the planning of a CMP over which it has jurisdiction, subject to appropriate confidential safeguards.²⁸ These modifications respect state commissions' ability to protect sensitive and confidential information.

Lastly, in recognition of state jurisdiction, OPSI recommends the following modification to Step 7.B:

B. State Jurisdiction and Compliance Therewith. The State Commission(s) shall retain full authority over their jurisdictional facilities and retain the right to approve or deny whether a proposed project has met any applicable state laws with respect to the facilities at issue. The Transmission Owner will comply with all applicable licensing, permitting, siting, or certification requirements as well as all applicable proceedings for eminent domain authority.

C. The Commission's Role in Reviewing CMP Cost Recovery Filings Must Be Enhanced.

²⁸ This provision does not limit a state commission's ability to require the production of relevant information and data needed in the exercise of the state commission's siting authority conferred by state law.

The PJM Transmission Owners describe CMPs as “beneficial and resilience-enhancing projects.”²⁹ However, the only support for this assertion is the statement that CMPs will “reduce the severity of the consequences of a physical attack on a critical transmission station or substation that is currently on the PJM CIP-014 List to the benefit and protection of their [the PJM Transmission Owners’] load served.”³⁰

The PJM Transmission Owners acknowledge there are no NERC system reliability standards driving the development of CMP projects.³¹ The PJM Transmission Owners explain that NERC’s CIP-014 rule requires only physical security.³² Rather, to support the M-4 proposal the PJM Transmission Owners point only to the “resilience-enhancing” nature of CMPs. However, while the Commission currently has a proceeding open related to grid resilience,³³ it has yet to prescribe a definition of resilience, and the Commission has not issued planning requirements for transmission projects driven by resilience objectives. Under these circumstances, the PJM Transmission Owners’ reliance on “resilience” as support for the proposed Attachment M-4 planning process does not have underpinning.

Also, while CMPs could be driven by state public policy requirements, the PJM Transmission Owners acknowledge that CMP projects are currently not required for state public policy purposes and that Attachment M-4 is not driven by state public policy objectives.³⁴

²⁹ January 17 Filing, at 18.

³⁰ January 17 Filing, at 18.

³¹ January 17 Filing, at 10 (stating that CMP projects “are not required for **system reliability**, operational performance, economic criteria or individual state public policy purposes.”) (emphasis added).

³² January 17 Filing, at 1-2.

³³ See, Grid Resilience in Regional Transmission Organizations and Independent System Operators, *et al*, 162 FERC ¶ 61,012 (January 8, 2018).

³⁴ January 17 Filing, at 10 (stating that CMP projects “are not required for system reliability, operational performance, economic criteria or individual **state public policy purposes**.”) (emphasis added).

Lastly, the PJM Transmission Owners acknowledge that CMP projects are not driven by economics.³⁵ There is no benefit/cost test in the PJM Transmission Owners' proposed Attachment M-4 process for CMPs analogous to PJM's planning process for market efficiency projects. So, the PJM Transmission Owners' suggestion that CMP projects are *per se* beneficial³⁶ is not backed up by any benefit quantification in Attachment M-4.

In this context, the Commission must be able to confirm, in the context of a CMP cost recovery case, the Transmission Owner's assertion that the CMP that is the subject of such cost recovery case will "reduce the severity of the consequences of a physical attack on a critical transmission station or substation that is currently on the PJM CIP-014 List."³⁷ Beyond that showing, the Commission must be able to ascertain that the transmission customers that will be required to pay for the project receive benefits associated with the risk reduction commensurate with the costs they will be required to pay. To do this, the risk reduction must be quantified for use in a benefit/cost test.

As proposed by the PJM Transmission Owners, the Commission's formal role under Attachment M-4 comes into play in Step 11 of the process when a PJM Transmission Owner proposes to recover its investment in the CMP and the associated costs from Responsible Customers in its zone. Such cost recovery would be proposed through a rate, including a formula rate, in effect under the applicable Tariff, Attachment H, in a way that the Transmission Owners describe as "similar to the cost recovery process the Commission follows for other Supplemental Projects."³⁸ The PJM Transmission Owners propose that such cost recovery filings "be subject

³⁵ January 17 Filing, at 10 (stating that CMP projects "are not required for system reliability, operational performance, **economic criteria** or individual state public policy purposes.") (emphasis added).

³⁶ January 17 Filing, at 18.

³⁷ January 17 Filing, at 18.

³⁸ January 17 Filing, Attachment B, Step 11.

to discovery on all matters pursuant to the procedures applicable under the applicable Attachment H, the Federal Power Act, and the Commission's regulations."³⁹

While the proposed cost recovery process for CMP projects may be similar to the cost recovery process followed for Attachment M-3 Supplemental Projects, the preceding planning process for CMPs is, inarguably, not similar to that followed for Attachment M-3 Supplemental Projects. Because of the limited openness, transparency, and opportunity for stakeholder input in the CMP planning process, parties affected by a CMP will have had many fewer opportunities to protect their interests during the CMP planning and construction periods than is normally the case for Attachment M-3 Supplemental Projects. For that reason, the Commission's review of CMP cost recovery filings must be much more rigorous than it is for Attachment M-3 Supplemental Projects.

For the reasons explained above, OPSI asserts that, without more, the Commission's current formula rate review process is not sufficient to establish that the cost recovery for CMPs will be just, reasonable and not unduly discriminatory. Accordingly, OPSI recommends that the Commission utilize its option to investigate CMP cost recovery proposals through the public hearing process pursuant to the Commission's rules of practice and procedure in 18 CFR Part 385 to enable interested parties to more comprehensively evaluate the reasonableness and prudence of CMP costs. Initiation of such public hearing procedures would also have the benefit of actively engaging the Commission's highly talented Staff in the rate investigation process for CMPs. Through the public hearing process, the Commission can better gain assurance that the CMP costs required to be borne by transmission customers will be at least commensurate to the benefits obtained by those customers.

³⁹ January 17 Filing, Attachment B, Step 11.

Accordingly, OPSI recommends the following additions to Step 11.

11. Public Review of CMP. At no time prior to the existence of the CMP being made known to the public by adherence to Step 10 of this Attachment M-4 shall the costs of any CMP be eligible for inclusion in rates filed by any Transmission Owner. After notice of the existence of a CMP has been provided by adherence to Step 10 of this Attachment M-4, the Transmission Owner may propose to recover its investment in the CMP and the associated costs from Responsible Customers in its Zone through a rate, including a formula rate, in effect under the applicable Tariff, Attachment H ~~similar to the cost recovery process it follows for other Supplemental Projects~~. Any such proposal shall be subject to discovery on all matters pursuant to the procedures applicable under the applicable Attachment H, the Federal Power Act, and the Commission’s regulations, including any applicable procedures for the protection against disclosure of commercially sensitive information and Critical Energy Infrastructure Information. **If a formal challenge is filed by any party, and the challenger requests the Commission to hold a hearing, a presumption shall apply that the Commission will hold a hearing.**

D. The “Modifications” Section of Proposed Attachment M-4 Should be Removed

The January 17 Filing provides no explanation of, or support for, Section (c) of proposed Attachment M-4, which is labelled “Modifications.” Including Section (c) redundantly refers to existing and controlling procedure in the Consolidated Transmission Owner Agreement and Federal Power Act, without proposing to alter such procedure, and is therefore unnecessary. For those reasons, OPSI recommends that Section (c) be deleted from Attachment M-4.

E. The January 17 Filing Contains Footnote Drafting Errors that Merit Clarification.

- Footnote 4 states, “Thus, the PJM Transmission Owners agreement that has requested PJM submit this proposed **Attachment M-3** in the eTariff system as part of PJM’s electronic Intra PJM Tariff.” (emphasis added). This sentence appears to be missing language and incorrectly refers to Attachment M-3, rather than Attachment M-4.
- Footnote 21 states, “CIP-014 projects are not needed to address the PJM criteria set forth in in the Operating Agreement, Schedule 6 and are not state public policy projects pursuant to Operating Agreement, Schedule 6, section 1.5.9(a)(ii)). Thus,

they do not fall within the definition of a Supplemental Project under the Operating Agreement. § 1.42A.” (emphasis added). But, the PJM Transmission Owners specifically state elsewhere that “CIP-014 Mitigation Projects are Supplemental Projects under the PJM Operating Agreement.”⁴⁰ This appears to be a contradiction and should be clarified.

III. CONCLUSION

WHEREFORE, for the reasons discussed above, OPSI requests that the Commission consider these comments and find the January 17 Filing deficient. OPSI recommends that the January 17 Filing not be approved without the modifications to Attachment M-4 recommended above.

Respectfully Submitted,

/s/ Gregory V. Carmean

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Dated: February 7, 2020

CERTIFICATE OF SERVICE

⁴⁰ See, e.g., January 17 Filing, at 11.

I hereby certify that the foregoing has been served in accordance with 18 C.F.R. Section 385.2010 upon each person designated on the official service list compiled by the Secretary in this proceeding.

s/s Gregory V. Carmean

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Dated at Newark, Delaware this February 7, 2020.

Document Content(s)

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