

## July 25, 2018 PJM Super Forum

### Survey Verbatim Comments

#### 12. Please provide up to three specific suggestions that would most improve the PJM Stakeholder process and meetings.

1. - Imposition of limits on time allotted to individuals and/or companies to comment at each meeting. - Allow for submission of additional comments in writing, to be posted publicly.
2. - There should be standing agenda item at Senior Committees to prioritize active work at any given time. - The option to maintain status quo should be made more clear at Senior Committee Voting - The MRC should clearly communicate human resource availability in order to facilitate the prioritization of work activity.
3. (1) Treat retaining the status quo as an alternative alongside and on equal footing with any proposal to make a change. Stakeholders should have the opportunity to endorse the status quo if there's consensus. (2) Consider developing different types of stakeholder processes for different types of issues. (3) Consistently make presentation slides available ahead of time.
4. 1 - set and enforce a time limit for presentations 2 - require that stakeholders prioritize open topics and limit the number of topics in play at any one time 3 - generally limit subcommittee and TF meetings to 1/2 day or less
5. 1) Increase transparency to all members by reducing the number of meetings, 2) highlight important votes with follow up emails and messages 3) allow for due process before rushing into PJM preferred solution.
6. 1) When proposals are near final, PJM should fully analyze the impacts of each proposal prior to a vote. Detailed data and simulations should be used where appropriate. This is particularly important for major changes to the market and provides invaluable information to stakeholders. 2) Instead of segmenting problems into numerous task teams and committees, stakeholders should attempt to resolve issues holistically whenever possible. As the energy and capacity markets are inherently linked, changes to one will affect the other. The scope of task teams and problem statements should reflect this reality,
7. 1. Eliminate the ability of stakeholders to circumvent the stakeholder process by initially engaging at the Standing Committee level to disrupt results coming out of working committees and task forces. 2. Better management and prioritization of stakeholder work to ensure main issues of concern are addressed before peripheral issues are tackled. 3. In facilitating effective stakeholder process results, PJM Staff should provide greater direction to stakeholders prior to and during the stakeholder process regarding both its technical and legal concerns as well as scope of authority.
8. 1. Clear prioritization by stakeholders of market-related matters. 2. Better time allocation of topics in standing committees. 3. Line-of-sight into PJM employee goals and priorities related to stakeholder topics.
9. 1. Define the market monitor role in the process. Seems that suggestions from market monitor come from firm views on how markets should run. 2. Review how the voting process determines changes. Stakeholder process voting is weighted too heavily to specific participant types, generators and investor owned utility members, and obvious they will vote in their own self interests every time as opposed to market participants that bear the cost of PJM stakeholder process. 3. Energy end users not represented at all in this process. Goes back to the sector voting and weighting and who is under represented in this process. Have to address how to make this a level playing field for your market participant groups and not just number of members.
10. 1. Develop rules to avoid filibustering. 2. If only a few stakeholders require "additional education" then try to accommodate offline so that deliberation are not delayed for other firms that have prioritized the matter.

11. 1. Market Monitor should not be part of stakeholder process. Stakeholders inappropriately defer to the MM (for multiple reasons, including intimidation). And it puts the MM in a position of monitoring the same policies he is trying to create. 2. There are specific entities that need to be limited in the amount of time they take in making unproductive comments during the stakeholder process. 3. PJM should refuse to establish stakeholder process for issues outside of PJM's purview. A specific example is the TRPSTF, which should never have gotten to the stakeholder discussion phase.
12. 1. PJM needs to stop presenting solutions prior to stakeholder vetting and PJM needs to stop driving initiatives due to politics; 2. Sector-weighted voting as lower level (<MRC and MC) committees; and, 3. PJM needs to utilize 3rd party facilitators for issues where PJM has a position.
13. 1. PJM should clearly define/state their interpretation of FERC rulings or their own PJM definitions in the stakeholder meetings, especially lower standing meetings. 2) PJM needs to more strictly adhere to the scope of meetings and narrow the objectives of what we want to accomplish. This includes a stronger facilitator that knows the charter of the task force and won't allow stakeholders to veer off track. 3) PJM needs to help prioritize issues by identifying lower priority items that don't benefit the market as much as others or items that PJM cannot complete without significant costs/issues.
14. 1. Prioritize meetings/issues 2. Focus on developing solutions rather than meeting predetermined deadlines 3. Limit affiliate voting in the lower committees so that when issues are brought before the senior committees they are more likely to receive broad support
15. All voting and polling at all levels should be consistent and reflect the ultimate decision-making voting approach (sector-weighted).
16. Clearing more days on the calendar for actual study and reflection -- which means fewer meetings.
17. companies forced to go into sector that is aligned with their business interests; recognize when process is getting in the way of substance and if too much delay "call the question" Ensure board is adequately informed BY stakeholders and NOT JUST BY STAFF
18. create and enforce time limits for presentations limit individual commenter's times and eliminate multiple comments from the same entity create new path for contentious issues other than CBIR
19. Improve sector selection results; lower the supermajority voting threshold; eliminate the IMM's advocacy role
20. Issues undertaken /task forces should be assigned/report to the appropriate committee per the PJM governing documents / committee charter(s). Limit the issues undertaken by PJM stakeholders to those within PJM / PJM stakeholder authority / responsibility per governing documents.
21. Meeting topics should be prioritized Too many meetings negatively impact participants with fewer resources
22. PJM can be overly aggressive on imposing timelines - timelines need to more stakeholder driven. PJM needs to do a better job of including stakeholders in setting priorities, including states.
23. PJM needs to better prioritize topics for meetings, so that members with limited budgets and resources can effectively participate.
24. PJM should limit presenters to a reasonable amount of time. PJM should control the monopolization of time and debate by the same parties and ensure it receives balanced input/feedback. PJM should set reasonable timetables for resolution of issues.
25. PJM use stakeholder process as only advisory and informational. PJM should Move forward with needed market solutions even if voting threshold unmet.
26. Prioritize issues. Defer if necessary.
27. Prioritize the issues better to allow for resolution. Be mindful of two tracks that have related issues that may impact each other.
28. Problem statements should actually describe a problem; The list of market products should be driven by the needs of the system operator, State issues should not be allowed to impinge on wholesale power decisions
29. Reduce importance of issue change/problem statement development. Allow for opportunities to vet issues in more comprehensive, cohesive fashion (e.g., energy price formation). Enhance importance of cost-benefit analysis in rule changes.
30. revamp Sector Weighted voting to something that allows more participation from all members.

31. Schedules on the agenda should be respected and speakers should not be allowed to exceed their time limits
32. the problem is not the number of meetings; it's the number of issues. too many issues. reduce the number if issues.
33. The stakeholder process especially the PC and TEAC have gotten less efficient over the past months. The conduct of some stakeholders has made these meetings less effective. More rules and objections from PJM to gain back control of these meetings needs to occur. One area is repetitively asking the same questions over and over. Requesting information that continues to be denied. Asking questions that are out of line and not on topic. Many stakeholder meetings are being overlapped, it is very hard from a company/policy perspective to juggle which meeting to attend. We strongly suggests that PJM does not over lap meetings (committee, subcommittee, task force, special sessions, etc.)
34. Too much time is spent bickering over language of Problem Statements and Issue Charges. Time spent on this should be limited by rule. Also not sure how valuable the identification of interests of parties is. Eliminate?
35. We feel that the PJM Stakeholder process is very well balanced and fair as is. Education is excellent and PJM personnel are very helpful.
36. When asking members to vote on a specific item during a meeting, amending the document on the spot should not be allowed.

**13. If you have any additional comments related to the questions above about the PJM stakeholder process structure and meetings, please provide here:**

1. Design the MRC/MC meeting in such a way that if someone is flying in from out of town for a once a month PJM meeting that make good use of their time on the relevant issues of the day.
2. • PJM has scheduled so many meetings that many overlap. And sometimes the same stakeholder needs to be at both of them. • Regarding the setting of timeframes, it would be more beneficial to set the expected timeframes for resolving an issue through the stakeholder process after a couple of meetings, as opposed to doing it when the Problem Statement is presented.
3. Adhere to principles of independence and not letting one segment of the stakeholders have undue influence. PJM staff trained in customer service and who customer is. Need major culture change.
4. Afford more time in between stakeholder meetings to allow for off-line discussion and voting by reducing volume of issues under consideration. Reduce volume of changes to PJM operative documents; enhance market rule stability.
5. Consistent messaging from PJM (all levels, staff through senior management) is important to understanding the PJM position on issues.
6. I find the process can be frustrating. Parties can hijack issue statements for their own purposes and that can be frustrating. PJM could play a better job of being independent and really pursuing or at least offering the best market outcome rather than trying to be politically correct; or at least make alternative 2 politically correct and acknowledge that politics is driving an other than perfect outcome but at least identify the best outcome
7. I sometimes think that PJM/Staff is pushing too hard for perfection. I sometimes think that staff is too big, though I appreciate the responsiveness.
8. In the past, PJM's stakeholder process has been efficient on capacity markets issues. Recently, we were not the only stakeholders upset with the process of the CCPSTF. After a year and a half of discussions, it was disheartening to see PJM move forward with two proposals, neither of which garnered stakeholder approval, and then ask FERC to convene a settlement process in lieu of resuming the stakeholder process. Moving forward with proposals stakeholders rejected risks obviating the purpose of having a stakeholder process.
9. It is difficult to track progress on and make sense of issues in front of stakeholders if too many issues are in play at once. Active stakeholder reps get worn out, and have little time to consider or evaluate issues,

solution proposals and potential impacts. The number of issues in play at once may be a driver for low levels of active participation (speaking, offering ideas) by many stakeholders. This can lead to snap judgments on positions rather than having time to consider alternate proposals and look for consensus. There could be benefit if PJM facilitators had an obligation to reach out to active participants and other stakeholder thought leaders between meetings to find out which components of issues are most important to them and where gap narrowing might be possible. Consider changing rules for introducing new proposals at the senior committee level, especially when subjects are complex. It does not seem fair that the MRC, for example, should be asked to make a snap judgment on a proposal introduced during a voting meeting on a topic for which other proposals have undergone months of scrutiny.

10. It seems that some task forces presuppose solutions instead of rigorous adherence to CBIR. Facilitators need to be strict about matrix development.
11. Not sure if this is right spot for this comment. But greater communication with the IMM before some of the PJM stakeholder meetings would be helpful to move the meetings along
12. Prioritization of issues should be reviewed and approved by stakeholders.
13. RE Q.4. The PJM stakeholder process has failed to adequately address the contraction of the Transmission Owner Sector and the proliferation of distinct stakeholder segments in the Other Supplier Sector (esp., financial traders). Notably, as asset ownership has consolidated the voice of the asset ownership has consolidated, the voice of the asset owners has been diluted. RE Q.7-9. PJM hosts about the right number of stakeholder meetings GIVEN THE NUMEROUS AND DIVERSE ISSUES THAT STAKEHOLDERS WISH TO ADDRESS. If stakeholders wish to lighten the meeting load, then we need to narrow the number of matters undertaken. However, such narrowing requires collective choices about whose issues are addressed first.
14. Sector Weighted voting caters to the Utilities. Participation from other members is stale, with most members allowing votes to be cast by Lawyers and Regulatory analysts. This is due to the thought of wasted time going up against a Utility groups that control the majority of sectors. I have participated in these markets since the beginning of the two settlement market as a Generation owner, Load Serving Entity and Trader. My participation over the years has dwindled to almost nothing due to the fact that Utilities will always push through whatever is in their best interest. The rest of us are left fighting it in FERC rather than wasting time in Stakeholder meetings that give a heavy advantage to one side. There has to be a more effective way
15. Stakeholders are very engaged, which is positive; PJM staff is very knowledgeable of the issues they present; Education sessions are valuable and often provided; IMM expresses its opinion in a timely fashion, also appreciated.
16. There is a lot of wasted time with lengthy presentations and and endless comments that seem designed to prevent an efficient process. Stakeholders need to recognize that process is designed seek a solution that a majority can support and not to prevent others from trying. There is no consequence to pursuing the latter.
17. There are too many issues being raised - need to priorities better - and incorporate stakeholders into setting priorities.

**18. Please provide up to three specific suggestions that would most improve the PJM decision-making process.**

1. - Encourage and enable the broadest participation possible in the lower committees, which will hopefully lead to more informed voting at the PJM senior committee level.
2. - Limit the number of votes cast by a single representative - Offer advanced stakeholder training on the finer details of manual 34, including making motions from the floor, points of order, etc. Such training should include case studies from recent abnormal procedural actions.
3. 1 - except where PJM sees a critical reliability need or market design deficiency, PJM should not be first out of the box with a solution proposal unless requested to do so by stakeholders 2 - need to re-think details of how consideration of solution concepts, implementing manual language and (when needed) agreement language are developed and reviewed then voted on by stakeholders. Sometimes concepts in matrices are

lacking in sufficient detail to understand implementation feasibility, potential impact, etc. These types of issues need to be addressed earlier in the process. 3 - consider modifications to the existing ELC process to make it a viable path for consideration of issues on which stakeholder consensus is unlikely to be reached. Allow stakeholders to vote on whether CBIR or modified ELC is the better route for considering individual topics at the problem statement/issue charge level?

4. 1) If PJM desires to have input from Sr. management and executives of stakeholders, then they need to move the MC to another location that is easier to access. (D.C., Philadelphia, Baltimore, New York) 2) There are not enough details provided at the lower level committees to ensure proposals are thoroughly vetted. The IMM does not participate enough or is vocal enough in the process at the lower level committees. Often additional details from PJM, IMM, or stakeholders come at the last minute. Visual or mathematical examples help. 3) The MC stakeholder meeting/process is broken. It rubber stamps the MRC vote and does not have a purpose.
5. 1) Where consensus is not possible, committees and task forces should elevate multiple proposals to the senior committee, as noted in #17. However, consensus should be the goal and elevating multiple proposals should only be done as a last resort. 2) The voting process at the lower level committees should be more transparent. Insight into how each sector voted, and the support/opposition within each sector, should be gathered and shared with the upper committee.
6. 1. PJM needs to be clearer on its positions and views prior to and during specific stakeholder process initiatives. 2. Stakeholders should not be permitted to circumvent the stakeholder process by initially participating at the lower level and then bringing separate proposals at the Standing Committee. 3. PJM needs to do a better job both at the outset and in the course of the stakeholder process of setting what is in bounds and out-of-bounds for discussion given the scope of the Problem Statement and Issue Charge presented.
7. 1. Fewer meetings and/or fewer topics. Would require some form of prioritization. 2. Directly addressing efforts to slow down progress. If parties wish to say "no", let that be the primary maneuver in lieu of extending the work stream. 3. For higher-profile issues and/or issues of which PJM itself has prioritized, consistent participation of PJM leadership and senior staff.
8. 1. Listen to stakeholders; 2) seek consensus via compromise (PJM proposal can't always be the winner); 3) work with stakeholders to develop solutions rather than provide a PJM solution without input from stakeholders.
9. 1. PJM should have the 205 rights associated with the OA. 2. Sectors should not have equal weighting. More weighting should be given to MWs, miles of transmission line, and capital investment. 3. Rules around qualifications for sectors need to be more restrictive. It is inappropriate for a stakeholder with a clear interest in supporting load positions to be allowed to participate in the generation sector merely because they have a small generator on their premises.
10. 1. Recognition that for some issues, consensus is not possible 2. Committees should develop proposals that can receive broad stakeholder support, not just serve the interest of one sector
11. 1. Enforce the Notice provisions of upper and lower committees. If matters are not put on an agenda and presentations are not posted in a timely fashion, then they should not be addressed. It is unfair to burden Senior Committees with new proposals that were not considered by the subcommittees. 2. Modify Sector Weighted Voting to accurately reflect industry consolidation in some sectors and proliferation in others. Better define consumer interests. 3. Lower committees should coalesce around one proposal. For example, allocative voting/polling methods could be considered as a way to better gauge the relative support among multiple proposals.
12. As soon as it is understood that consensus won't be reached on an issue, it should be escalated
13. Goal task forces to create, evaluate, and propose solutions that solve the problem and not to seek political solutions. If not, stakeholders should give up 205 rights and just take the fight to FERC.
14. I am generally satisfied with PJM's decision-making process.
15. I think stakeholders are often unprepared, and contributing to the churn of having to repeat information and presentations, due to the sheer number of issues and meetings being taken on. There need to be limits.

We should sometimes consider using expedited processes for low-risk or low-impact decisions.

16. More transparency of affiliate voting or, alternatively, recognition of potential sector-weighted outcomes in consensus-building process.
17. PJM needs to include cost-effectiveness in its proposals, to incorporate end-users and recognize effect on retail rates.
18. PJM should enforce a policy that all proposal sponsors must provide an executive summary of their proposal. PJM should take a different approach to decision-making on contentious issues that have little chance of achieving consensus.
19. Send proposals out to committee members via email (as they become available) so the proposal can be processed before a vote.
20. Some indication of a proposal's sector support in lower level committees is necessary to facilitate negotiation to achieve consensus. Too often negotiations take place after or just before an MRC vote.
21. Stacked voting at the Committee level can suppress solutions with better chances of member support. Consider a lower, reasonable threshold of support at the Committee level.
22. The current decision-making process at PJM is very good. When consensus is not reached within the Stakeholder process, the PJM Board of Managers have the authority to determine if change is needed and what is best for the market.
23. There seems to have been proposals that get voted on at senior committees without the benefit of the lower level vetting.

**19. If you have any additional comments related to the questions about the CBIR process, please provide here.**

1. The governance rules should reinforce the core principle that the stakeholder process is intended as a forum to ensure that stakeholder views are known and transparent and a consensus is reached if a consensus is achievable, meaning the substance should always drive the process not the other way around.
2. • While useful/meaningful information is shared at the lower level committees that are focused on operational/technical issues/impacts that better informs the upper level committees, stakeholders may not be engaging as they can over-ride the lower level committee using sector voting at upper committee. Now the groups that hold the sector voting power are less inclined to negotiate compromise solutions at the lower level committee. • The MM should not be able to participate in the committee process unless requested.
3. Balance of power issues are a primary concern with CBIR and the current stakeholder climate. We have largely maintained that balance; efforts to change the balance of power will likely cause more harm than good.
4. It can't work if no one is willing to compromise. Where would we be without CBIR education and the matrix to establish solution criteria and allow for comparison of alternatives?
5. One way to read Q16 about the types of proposals that should be presented to senior committees is that it is a commentary on the differing voting rules and strengths at lower versus senior committees. While focused technical groups should be mindful that proposals they develop will need to pass scrutiny in wider stakeholder forums, pre-judging proposals at junior committees based on how they might fare in senior committee votes is not appropriate.
6. PJM self-control: 1) solutions and 2) bringing new problems
7. RE Q.14. Stakeholder dialogue and the stakeholder process may be improved by greater direct and resourced participation from stakeholders, rather than agents. RE Q.15. Stakeholder discussions are useful for education, deliberation and resolution of differences. The ELC process should be used earlier on for controversial issues where consensus will be extremely challenging. The full formality of the CBIR process need not be undertaken for matters that are well-understood. RE Q.16. Stakeholder committees should develop the best proposals possible. Good proposals that follow CBIR principles and include input from diverse interests should be well-received by upper committees. If this question is a referendum on bifurcated voting methods at upper and lower committees, then balance of power issues (including weighting to reflect



substantial asset investment, diverse business lines, industry consolidation, and proliferation of new business models) should first be addressed. RE Q.17. Measurement of “consensus” can often depend on the manner of voting. While elevation of a single proposal should be a committee’s goal, elevation of multiple proposals with strong support (which can be measured differently by employing different voting methods) could be appropriate. However, elevation of multiple proposals as a consequence of stalemate or filibustering should not be accommodated. For example, allocative voting methods should be considered to better gauge the relative support among multiple proposals.

8. Should we consider sector weighted voting at the MIC?
9. There should be more discussion upfront regarding the means by which a proposal would be implemented: manual, OA, tariff. TF facilitators need to strictly enforce against scope creep.
10. Votes from the stakeholder process should be respected by PJM and they should file the proposal that has the highest support

**21. Please provide up to three specific suggestions that would most improve state regulators interface with the members.**

1. - Commission staff need to be encouraged to participate more in the stakeholder meetings and be educated on the issues before matters are taken to the PJM senior committees for a vote. - Regulator participation in PJM meetings and the CBIR process should be encouraged, and separate meetings between commission staff and PJM should be discouraged.
2. Potentially including state regulators to the meetings would help with interfacing with members and also regulators can see how the process works.
3. • State input for transmission and market issues would be helpful. • Unsure if state voting would be helpful to stakeholder process. • OPSI meetings should be open to PJM stakeholders. States can attend PJM meetings, but not the opposite.
4. 1) While not voting members, the states have a strong influence on the effectiveness and viability of any proposal coming out of the stakeholder process. Strong, unified support or opposition to proposals should bear weight on stakeholders decisions. 2) Implement a market roadmap process, similar to MISO, that would allow stakeholder to advocate for issues/identify problems that PJM should work on in a given year. 3) PJM should include non-voting members in any feedback requests or polling.
5. 1. PJM meetings are open to state regulators. Maintain this access. 2. PJM Members pay for the state regulator trade organization (i.e., OPSI). Maintain this program. 3. State regulators may, of their own accord, choose to become Members. Maintain this option. 4. PJM has staff specifically dedicated to state regulator interests. Maintain this program.
6. 1. They provide their positions (OPSI so conflicted we rarely get to hear their concerns except don't raise prices). Written best. 2. Offer more formalized (monthly?) meeting with state regulators whereby sectors can elect or self-select depending on topic to discuss?
7. Create a quarterly or semi-annual meeting where state regulators present their views and opine on current PJM issues and stakeholder activities. There should be more engagement with OPSI where PJM and stakeholders listen.
8. Either join as Members and participate equally with all other stakeholders or stick to their private meetings with the PJM Board
9. Generally, PJM and stakeholders are engaging the states. For example, OPSI has reached out to PJM and stakeholders for education and discussion which has worked well.
10. Our organization operates within a regulated state. It is our observation that PJM does meet with our state regulators periodically and when there are issues. It is good when PJM informs members of future meetings and agendas with the members state regulator so that the member can be prepared to answer questions from their state regulator. A suggestion which may improve state regulators interface with members and PJM would be to invite members, "when appropriate", to discuss relevant issues to meetings with PJM and the state regulator.

11. PJM Staff should regularly schedule meetings with Commission Staffs.
12. Reduce volume of issues/meetings to allow meaningful opportunity to consider the issues; the pace of potential change at PJM is such that state regulators may not have meaningful opportunity to engage in a sustained manner.
13. Regular meeting dedicated to issues within a single state. Invitees should include all parties with interested in that state
14. States already have OPSI as a conduit for presenting their views.
15. Survey of states at the Committee level should be encouraged; PJM should have early and deeper discussions with state regulators prior to establishing a stakeholder process on key issues, including a discussion of scope.
16. This is the raison d'etre of OPSI

**29. Please provide up to three specific suggestions that would most improve PJM staff, Management, and Board interface with its Members.**

1. There should be more transparency on perspectives communicated to Board members from differing members on issues/proposals.
2. - To supplement the Liaison Committee meeting discussions, sectors could provide written summary statements of majority and any minority positions on the topics. - In addition, consider brief sector meetings with individual Board members once per year to discuss sector-specific concerns, as is the practice in ISO-NE.
3. 1 - There could be benefits to stakeholder decision making processes if PJM meeting facilitators and (when appropriate) management would reach out to active stakeholders or leaders of stakeholder interest groups to better understand levels of interest, impact or concern about different parts of complex issues and to work behind the scenes to search for areas of potential compromise. 2 - Stakeholders sometimes get different messages from PJM management versus from facilitators of TFs or other topic meetings or agenda items. For instance, management may signal that work on a topic can slow down based on relative priorities, linkage with other issues under consideration or pending FERC action. Meeting facilitators, however, may still push their groups pedal to the metal.
4. 1) better communicate with emails. Having information on website is not enough. Members receive too many emails on sorts of matters and the most important topics get downplayed. 2) it is common for PJM to send out messages to a sub-set of the membership... we have received messages from peers close to a vote or a poll that we had not been sent directly before.
5. 1) When stakeholders do not reach agreement, the Board should continue to receive the outcomes of all votes to enable their decision making process. 2) PJM should provide detailed data and analysis of any major proposal before that issue is brought to a vote. Stakeholders requests for more data/analysis should be heeded.
6. 1. Sector meetings with Board or more open session. NYISO and ISO-NE have meaningful meetings between board and members. PJM does NOT in that liaison committee is very controlled with pre-planned discussion and position. No spontaneity (sp?) with the board at all. PJM is the worst in class in this one. NYISO and ISO-NE board members actively and comfortably engage in discussions with stakeholders and are still able to make independent decisions. PJM doesn't trust its board to do the same and tries to control interaction as much as possible.
7. 1. Clear line-of-sight into PJM staff/management annual goals when they relate to specific stakeholder proceedings and/or outcomes. 2. For issues under Board consideration when PJM Members are unable to meet or exceed super-majority threshold, publishing materials provided to the Board (with exceptions for commercially sensitive material).
8. 1. More issues should be brought in front of Board. One idea would be a CBIR-lite program that would allow stakeholders to briefly state their positions to the Board without the PJM/MM intermediaries. LC meeting is too generalized and short for this to happen there. 2. PJM and Market Monitor should not be the only ones



to talk to the Board. 3. LC is fine, but comments are by sector and may not address the specific issues at hand.

9. 1. PJM staff should follow member guidance and decisions, not staff preferences 2. Board needs to receive information on all perspectives 3. Greater transparency regarding what information Board is provided is needed
10. Be as transparent as possible as it relates to changing market conditions and its affects on members.
11. Better access to PJM staff and chairs by publishing or listing contact information and title, inclusive of e-mail and phone numbers. This should also apply to stakeholders presenting proposals so stakeholders can contact them about their proposals.
12. Board members should occasionally attend or call into lower committees and task forces.
13. Consider ways to have stakeholder positions described to the board in stakeholder terms. It is my understanding that PJM prepares and presents both their own position and that of others.
14. Ensure consistency in PJM positions and communication of those positions among stakeholders. Be clear when a PJM position is in development or is a fully developed position and supported by PJM senior leadership.
15. I am generally satisfied with PJM's interface with its Members.
16. Increase the # of Board Members @ MRC/MC Meetings (at least 3 if not 1/2 (+1) of the Board).
17. Much improvement since the last survey, especially with Liaison Committee engagement.
18. NEPOOL Members, twice a year, have direct discussion with ISO NE Board members, sector by sector, on topics assembled by the active sector members. Liaison Committee is, I think, designed to accomplish something similar, but the content and topics are filtered through senior management, which results in less optimal communication of sector concerns. The Liaison Committee process should allow for more of a sector-directed discussion topic selection.
19. On contentious issues, some form of ELC like process should be created to allow PJM Staff, IMM, and Members to directly and openly address the Board. No one gets special exception to present behind closed doors.
20. On tariff votes members should be allowed to make an argument directly to the Board before they approve or disapprove tariff revisions. PJM should seek greater internal coordination before making public proclamations. There seems to be an increasing number of mixed messages from different areas of the organization.
21. open Board meetings (like MISO)
22. PJM should provide better and more timely cost impact analysis. PJM recently has been less of a facilitator, and more of a forceful stakeholder in the stakeholder process. PJM needs to be more focused on cost impacts - focus on real, efficient outcomes - and be less adamant about theories that are not grounded in reality. Keep solutions simple, and theoretically sound.
23. Provide cost projections for any proposal before the proposal comes up for a vote.
24. Staff and the IMM should not be allowed to make proposals. Rather they should explain their need and allow a Stakeholders to make proposals that answer the needs
25. The LC is a very good forum for the members to communicate with the Board of Managers. Two of the four meetings occur after the board meeting which doesn't allow for members to give their perspective before the Board meets two of four meetings. Also, when there are multiple solutions to be presented to the Board, (a PJM solution and a member solution) it is left to PJM to present both solutions to the Board. Would it be appropriate for a member representative to present the member solution to the Board?
26. The Liaison Committee should be redesigned to become a process where each sector gets to meet privately with the Board of Managers to discuss issues of interest pertinent to each sector. The current LC process leads to limited agenda items that may not be of interest to all sectors (given the majority-rules process for choosing topics) and limited interaction with the Board.
27. There should be clear separation between staff providing facilitation and staff providing education and advocacy. Votes and positions are frequently distorted by stakeholders who support something they dislike because its better than another proposal that they really hate. PJM could hire consultants to advise

on voting and polling approaches that will minimize such distortions.

**30. If you have any additional comments about the questions above related to PJM staff, Management, and Board interface with the Members, please provide here:**

1. 22: Would be "Strongly Agree" if cost projections for proposals consistently were provided before the proposal comes up for a vote. 24: Unclear what the question means by "technically sound." 25: Unclear what the question means by "competitive and robust."
2. Is the Board truly independent if they don't listen to stakeholders when they consistently and soundly disagree with PJM staff but the Board still follows the recommendations of the staff? Management needs to do a better job of working with ALL stakeholders.
3. It would be interesting to have PJM provide written comments on an issue -- its position, member positions etc that it provides board and allow stakeholders to see and possibly suggest edits
4. PJM can be very restrictive on scope - thus more efficient long term solutions are sometimes not considered.
5. PJM may be in a good position to broker consensus. However, PJM should not sacrifice its independent assessment for the sake of consensus, but should take stakeholder consensus under consideration in developing its view.
6. PJM should be more concerned about the costs of the markets and services that they administer. IMO PJM is biased toward reliability regardless of cost. PJM has their finger on the reliability scale instead of letting the capacity market work.
7. Some meeting facilitators seem to manage the CBIR process in a rote, check each box manner. The more effective ones use the CBIR process as a path for trying to develop consensus rather seeing success simply as completing every step.
8. Staff does an excellent job at facilitation. However PJM lately seems to have their minds made up on the solution before stakeholders begin deliberations.
9. The Board appears to be overly supportive of Staff rather than independent. PJM should hire a senior individual with "outside" market experience; someone who has not grown up within the PJM experience
10. Unable to adequately answer Q28 ("...the PJM Board currently receives sufficiently clear and detailed information on the perspectives of members.") because we do not see what information the Board receives to reflect the perspectives of members.
11. When PJM has a proposal it can dominate the stakeholder process and can prejudice stakeholder support away from stakeholder proposals. Processes needs to balance interests of primary stakeholders. Today load interests dominate stakeholder activities because of imbalance in membership. Some members have very little risk involved in the consequences of their votes and resultant decisions.

**31. Would you like to add any other suggestions for improving PJM's governance and stakeholder process?**

1. Affiliate voting needs to be reconsidered. We believe it adds to the stalemates at the lower committee
2. Educate stakeholders on Robert's Rules so all members / stakeholders understand the guidelines for PJM meetings / stakeholder process.
3. I do not believe that it would be productive to try to address "balance of power" type issues such as number of sectors or apportioning sector votes among interest groups. Increasing scrutiny of initial and ongoing sector selection for Voting Members to ensure that sector selection follows agreement and manual rules and guidelines could reduce some complaints about sector placement.
4. More transparency in voting process at committee and task force levels, to prevent monopolization of final positions presented to larger committees for final vote.
5. Other comments: • Should voting be the same in both lower and upper level committees? • Senior committees should not consider any proposals that have not been advanced from lower level committees.

6. PJM has not developed nor required proper member protocols. Municipals and Cooperative Electric Companies are not members of the RTO and participate through designees that can come and go leaving Investor Owned Electric Distribution Companies to provide an unfunded and unrecognized backstop, provider of last resort service to Municipals and Cooperatives.
7. PJM needs to do a better job communicating to its members in a timely and detailed manner both the conditions on the grid and the decisions that it is making to guard against the tendency to over schedule the system, dampening market signals that are essential to the long term viability of the competitive markets.
8. PJM should reinvigorate the combined cycle owners users group meeting. With many new combined cycles coming online PJM's modeling appear to be insufficient in regards to the combined cycle attributes.
9. PJM's governance and stakeholder process gets so much right, but right now we appear to be burdened by the current pace of change, either self-inflicted or driven by external forces. The stakeholder process is not the problem, but it may be an easy proxy for concern around the seismic changes within the market and regulatory construct, including the blurring of state and federal jurisdictional lines. Fair questions to ask may be: Is the volume of work (all on a quick clock during a time when we have abundant excess capacity) hindering our ability to process the need for change? Have the rules become so complex that only a small group can speak with authority? Is this affecting state regulators' ability to engage? Why have PJM Members with perceived problems with market rules not brought Problem Statements to the PJM stakeholder process? Can the Grid 20/20 Symposiums, even if no rule changes are contemplated, be integrated into the PJM stakeholder process to avoid perceptions that important issues are not getting into the stakeholder process? Why are cost benefit studies not a regular component of rule change considerations?
10. Sector-weighted voting at lower level committees. Increase transparency of voting record at MRC to mirror that of the MC.
11. Stakeholders and PJM should parse any further discussions regarding changes to the stakeholder process into Process Mechanics (M34) and Balance of Power (voting strength) in their discussions. Mixing those issues together would be a huge mistake.
12. The structure of the PJM stakeholder process should be altered to more closely resemble the ISO NE/NEPOOL shared governance approach. ISO NE has Section 205 rights over its tariff, but if ISO NE and the NEPOOL stakeholders have divergent views on tariff provisions/changes, both views must be presented to FERC simultaneously and with equal footing under Section 205.
13. We feel that the current stakeholder process and PJM governance structure is very fair and balanced. We appreciate the opportunity to give PJM the suggestions we have offered in this survey. We feel that any changes should be minor.