

Unanimous OPSI Comments on Proposed CTOA Revisions Informational Report
February 22, 2024 Members Committee

With regard to the Consolidated Transmission Owners Agreement (CTOA) amendments noticed for the February 20, 2024 TOA-AC, the OPSI Board notes the following: If the primary purpose of the proposed CTOA amendments is to transfer the regional transmission planning protocol from the Operating Agreement to the Tariff, and thus provide PJM exclusive 205 filing rights over that planning protocol without the currently required approval of the PJM Members Committee, the CTOA proposed amendments are far broader than necessary to accomplish this. Given the complexity and breadth of the proposed amendments, insofar as the PJM Board is being asked or plans to take action on those amendments, the OPSI Board requests that the PJM Board make no substantive decision in that regard until March 31, 2024, at the earliest. That will give, the OPSI Board, as well as other PJM stakeholders, an opportunity to study and evaluate the interaction of the proposed amendments and formulate and convey a position to the PJM Board for its consideration.