

OPPOSE
Economic Matters
3/9/2023

House Bill 1186 – Public Service Companies – Annual Report on Votes Cast at Meetings of Regional Transmission Organizations

Baltimore Gas and Electric Company (BGE) opposes *House Bill 1186 – Public Service Companies – Annual Report on Votes Cast at Meetings of 3 Regional Transmission Organizations*. House Bill 1186 requires each public service company that is a member of a regional transmission organization (RTO) to submit annual reports of their votes cast at regional transmission organization meetings description and an explanation of how each vote cast by the public service company is in the interest of the public.

An RTO is an organization formed at the approval of the Federal Energy Regulatory Commission (FERC). In the areas where an RTO is established, it coordinates, controls and monitors the operation of the electrical power system, usually within a single US State, but sometimes encompassing multiple states. PJM Interconnection LLC (PJM) is a regional transmission organization (RTO) in the United States. It is part of the Eastern Interconnection grid operating an electric transmission system serving all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and the District of Columbia. BGE is a member of PJM.

PJM does not own power lines or generators. Instead, it is a neutral, regulated organization that directs the operation of power lines and generators for many different owners. PJM acts as an agent to provide fair access to the transmission system for competing suppliers and electricity users. The PJM stakeholder process uses the Consensus Based Issue Resolution (CBIR) Process to develop solutions with collaborative input from all stakeholders. The CBIR Process is based on the concept that better solutions come from the minds of many. Each voting company is allowed one primary and three alternate representatives per committee.

There are many different committees that provide a forum for members to share their positions and resolve difficult issues to ensure an open grid and transparent markets. While most committees don't record individual company votes in order to promote robust dialogue and consensus, the votes of the senior most committee, the Members Committee, are recorded by company and are publicly available. Requiring a utility to submit information on every vote taken at lower-level committee meetings would muddle the conversations there, is unnecessary, and would be a significant administrative burden and cost for no incremental benefit. The final information for all votes is readily available and published by PJM.

Finally, House Bill 1186 overreaches and is not an efficient use of resources because it seeks voting records and information on transmission-related activities, all of which are regulated at the federal government level and not by the State of Maryland.

BGE respectfully requests that the Committee issue an unfavorable committee report.