



Credit-Related Information Sharing (RM22-13-000) and Duty of Candor (RM22-20-000) NOPR Updates

Risk Management Committee
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Eric Scherling
Assistant General Counsel

Colleen Hicks
Associate General Counsel

PJM anticipates participating in joint comments to be filed by the ISO/RTO Council

General Themes

- PJM generally supports the proposed rulemaking, which will require revision of RTO/ISO tariffs to allow for sharing of credit-related information among ISOs/RTOs for purposes of credit risk management and mitigation.
- PJM advocated for such a rule during 2021 FERC Technical Conference on RTO/ISO credit principles and practices.
- The sharing of credit-related information among ISOs/RTOs should be voluntary, not required.
- Required tariff revisions should also allow for sharing of credit-related information with markets that are not FERC-jurisdictional (ERCOT, AESO and IESO), subject to reciprocity arrangements.

Comments on this NOPR are due October 7. PJM is continuing to evaluate its position on the NOPR.

PJM intends to file comments in the Duty of Candor NOPR

General Themes

- PJM generally supports FERC's efforts to implement a broader duty of candor to promote the exchange of accurate, factual and complete information that is not false or misleading or does not omit material information.
- PJM acknowledges that there are limitations in the application of 18 CFR 35.41(b) in achieving FERC's goal of a uniform duty of candor with respect to matters within FERC's jurisdiction.
- The proposed rulemaking is a positive first step in achieving a uniform duty of candor.

Comments on the NOPR are due November 10. PJM continues to evaluate its position on the NOPR.

Facilitator:

Jim Gluck,
Jim.Gluck@pjm.com

Secretary:

Christina Stotesbury,
Christina.Stotesbury@pjm.com

SME/Presenters:

Eric Scherling, eric.scherling@pjm.com
Credit-Related Information Sharing NOPR

Colleen Hicks, colleen.hicks@pjm.com
Duty of Candor NOPR



Member Hotline

(610) 666-8980

(866) 400-8980

custsvc@pjm.com

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