



# 2019 Media Kit

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## DEDICATED TO SUCCESSFUL ENERGY MARKETS

The PJM Power Providers Group (P3) is a non-profit organization that supports the development of properly designed and well-functioning markets in the PJM region. PJM is a regional transmission organization that manages the supply and movement of power in 13 states and the District of Columbia. Combined, P3 members own over 65,000 megawatts of generation assets and produce enough power to supply over 50 million homes in the PJM region covering 13 states and the District of Columbia. Collectively, P3 members have invested tens of billions of dollars into facilities in the PJM market place without any regulatory guarantee of a return of or on that investment. Combined, P3 members own and operate virtually all forms of electricity generation, provide demand response services in certain markets and serve end use consumers through retail affiliates.

P3 members believe that properly designed and well-functioning competitive wholesale electricity markets are the most effective means of:

- ensuring a reliable supply of power to the PJM region,
- facilitating the investment of at-risk capital in both new and existing technologies in order to deliver competitively priced power to consumers; and
- complimenting state and federal environmental objectives.

The P3 Group shall promote policies at the federal and state level that will allow the PJM region to fulfill the promise of these competitive markets. P3 supports:

- Transparent price signals to and from consumers so that they may be the ultimate drivers of the competitive market,
- Effective and independent market monitoring coupled with well-defined rules to identify and prevent market power abuse or gaming and to promote confidence among state regulators and market participants,
- Policies that support effective pricing mechanisms which would allow generation, transmission and demand response to compete on equal footing,
- Capacity markets as a tool to encourage long term capital investments in existing as well as new generation resources,
- Stable, technology-neutral, state and regional retail policies, such as default procurement auctions, that leverage the benefits of wholesale competition,
- The development and promotion of renewable and alternative energy generation within the framework of a competitive market, and,
- Non-discriminatory, technology-neutral, economy-wide strategies to achieving state carbon reduction objectives.

. Members of the PJM Power Providers Group include:

- [Calpine Corporation](#)
- [Cogentrix](#)
- [Competitive Power Ventures](#)
- [Eastern Generation, LLC](#)
- [Homer City Generation, L.P.](#)
- [LS Power Development LLC](#)
- [NRG Energy](#)
- [Talen Energy](#)
- [Vistra Energy](#)

*"P3 members produce enough power to supply over 50 million homes. They are committed to providing a reliable and competitively priced supply of power to consumers. Competitive wholesale markets will ultimately benefit the entire PJM region."– Glen Thomas, P3 Group President*

## LEADING THE CHANGING MARKETPLACE

. The PJM Power Providers (P3) believes that well-functioning competitive wholesale electricity markets are the most effective means of ensuring a reliable supply of low cost power to the 13 Mid-Atlantic and Midwestern states and the District of Columbia in the PJM service territory. P3 has provided expert testimony, advocated market reforms in PJM at the state and federal levels and championed the benefits of competitive markets throughout the PJM footprint. A sampling of P3 advocacy includes the following



**P3 Filed Comments to FERC's Order and 206 Proceeding regarding Fast Start Resources in PJM - February 12, 2018.** P3 generally supported FERC's order and urged action. P3 noted that it would comment further once it reviewed PJM's filing. [MORE](#) **P3 Filed Reply Brief Comments in this Proceeding - March 14, 2018.** P3 filed a Reply Brief to the filings of PJM, the PJM IMM, and the Department of Market Monitoring for the California Independent System Operator ("CA DMM") regarding FERC's Order and 206 Proceeding regarding Fast Start resources in PJM. P3 submitted an affidavit from Robert B. Stoddard that strongly supported the conclusion that reforms are necessary in PJM and the Commission's preliminary finding that PJM's current tariff is not just and reasonable, and further that it is well-supported by economic theory and the particular facts of the PJM energy markets. P3 generally supported PJM's proposed response as just and reasonable. [MORE](#) **P3 Filed an Answer to PJM Fast Start Filing - April 30, 2018.** P3 filed an Answer to PJM's March 14, 2018 Reply Brief in the Fast Start proceeding encouraging the Commission to approve PJM's proposal to allow dispatched resources to set the clearing price. [MORE](#)

**P3 Urged NJ Senate and Assembly to Oppose Out of Market Subsidies for Nuclear Power – February 22, 2018.** P3 testified on February 22nd before the Joint Committee Hearing of the New Jersey Senate Appropriations Committee and the New Jersey Assembly Telecommunications and Utilities Committee in opposition to NJ Senate Bill 877 and NJ Assembly Bill 2850. [MORE](#) **P3 Also Provided Oral Testimony nuclear subsidies on April 5, 2018, to the Senate Appropriations Committee.**

**P3 Urged PA House Committee to Oppose Legislation to Erode Pennsylvania's Competitive Electricity Market - March 9, 2018.** P3 filed Testimony in opposition to PA House Bill 1412 on March 9th. P3 stated that PA House Bill 1412, if enacted as currently written, would allow Pennsylvania's electricity distribution companies to own generation assets - in direct contravention to the Electric Competition on Customer Choice Act of 1996. P3 urged the committee to oppose House Bill 1412 as introduced. P3 noted that the development of microgrids in Pennsylvania offers enormous potential and opportunity for the Commonwealth provided it is done consistent with the competitive electric generation markets that have served Pennsylvania so well. [MORE](#)

**P3 Filed a Request for Rehearing regarding FERC's Capacity Performance Orders - March 26, 2018.** P3 requested rehearing of FERC's February 23, 2018 Order addressing two separate complaints challenging PJM's RPM rules relating to the participation of Seasonal Resources. P3 argued that the February 23 Order is arbitrary and capricious because the Commission failed to meaningfully address serious concerns raised by various parties, including PJM and P3, and that the Complaints should have been summarily rejected as impermissible collateral attacks on the Commission's orders accepting PJM's Capacity Performance construct. P3 requested the Commission grant the rehearing request and dismiss the Complaints as impermissible collateral attacks. [MORE](#)

**P3 Filed an Answer Opposing PJM's Rehearing Request in FERC's Determinations Regarding Primary Frequency Response - March 30, 2018.** P3 filed an answer opposing PJM's request for rehearing regarding FERC's Order regarding Primary Frequency Response. P3 noted that PJM's Request for Clarification/Rehearing seeks to relitigate determinations that the Commission made after a full and complete record was created. P3 noted that FERC Order No. 842's determination not to impose new PFR requirements on existing generating facilities was correctly decided on the basis of a full and complete record. P3 requested that PJM's Request for Clarification/Rehearing be denied in its entirety. [MORE](#)

**P3 Filed Comments Supportive of PJM's Efforts to End Speculative Capacity Market Bidding - March 30, 2018.** P3 filed comments supporting PJM's revisions to Incremental Auctions. P3 noted that the entire PJM proposal is a product of a stakeholder compromise. P3 noted that its members differ on specific aspects of the PJM proposal. However, P3 is supportive of the PJM Filing as a package of reforms aimed at reducing speculative activity in PJM's capacity auctions. Specifically, P3 stated that it supported PJM's efforts to revise the incremental auctions and remove speculative behavior from capacity auctions. P3 noted that adverse effects on the market result when resources offered in the BRA are not delivered. P3 supported PJM's proposed incremental auction revisions stating that PJM Filing is a result of an over year- long stakeholder process; P3 supports PJM releasing excess capacity commitments using a Sell Offer price equal to the BRA Clearing Price; P3 supports the revised triggers that determine the MW quantity of PJM Buy Bids and/or Sell Offers in the IAs; P3 supports PJM's proposal to replace the current practice of allocating uncleared IA Sell Offer MWs as ECCs; and P3 supports PJM reducing the number of IAs from three to two per Delivery Year. [MORE](#)

**P3 Filed Pre-Technical Conference Comments by Dr. Roy Shanker in the FERC Seasonal Capacity Dockets - April 11, 2018.** P3 filed pre-technical comments by Dr. Roy Shanker regarding Seasonal Capacity, responding to the four detailed technical questions raised by FERC. The comments were filed prior to the April 24, 2018 technical conference. [MORE](#) **P3 Filed Post-Technical Conference Comments in the FERC Seasonal Capacity Dockets - July 13, 2018.** P3 filed post-technical comments regarding Seasonal Capacity, highlight the May 2021/2022 RPM BRA auction results. P3 pointed out that the recent auction results held after the April 24, 2018 Technical Conference undermine the arguments made by ODEC and AEMA in their complaints, and asked the Commission to dismiss both complaints. [MORE](#)

**P3 Filed Protest with Supporting Affidavit from Dr. Roy Shanker regarding PJM's Proposed Capacity Repricing/MOPR-Ex Proposals - May, 7, 2018.** P3 filed extensive comments at FERC detailing its concerns with both the MOPR-Ex and Capacity Repricing proposal put forth by PJM while encouraging FERC to pursue an exemption free MOPR while allowing states to employ existing FRR mechanisms. [MORE](#) **P3 Answered Comments of Exelon, PSEG and PJM Regarding a Clean MOPR - June 1, 2018.** P3 provided detailed commentary to the Commission explaining how the New Jersey ZEC program was not targeted at the pricing of an environmental attribute, but rather an attempt to provide additional revenue to questionably uneconomic plants. [MORE](#)

**P3 Filed Comments regarding Grid Resiliency - May 9, 2018.** P3 filed Comments on Grid Resiliency encouraging the Commission to address any resilience concerns through market-based mechanisms. [MORE](#)

**P3 and Exelon Filed Rehearing Request and Clarification regarding FERC's Order on PJM's Incremental Auction Revisions - June 7, 2018.** P3 and Exelon filed a joint request for rehearing asking FERC to revisit its decision to reject PJM's proposed tariff provisions aimed at reducing speculative bidding in PJM's capacity auctions. [MORE](#)

**P3 Supported the Clean MOPR Complaint from CPV, Eastern and Calpine - June 20, 2018.** P3 filed supportive comments of the CPV, Eastern and Calpine complaints that sought a virtually identical MOPR as suggested by P3 in the Capacity Repricing/MOPR-Ex docket. [MORE](#)

**P3 Supported Complaint of DC Energy Seeking Changes to PJM Credit Requirements for FTR Participants - June 25, 2018.** P3 filed Comments agreeing that current PJM market rules do not require sufficient collateral and lead to large open FTR positions that cannot be covered in the event of default (this complaint was filed prior to the GreenHat default). [MORE](#)

**P3 Filed Supportive Comments at FERC Regarding PJM's FTR Credit Policy - August 14, 2018.** P3 filed supporting comments regarding PJM's proposed tariff revisions to Attachment Q ("Credit Policy") of its Tariff. The revisions include a new two-step process for the determination of the applicable FTR Credit Requirement, including a proposed \$0.10 volumetric minimum FTR credit requirement. P3 agreed with PJM that the current collateral requirements related to FTRs provided insufficient protection to the market and PJM members in the event of a default. [MORE](#)

**P3 Filed Comments at the Pennsylvania Department of Environmental Protection Regarding the PA Solar Plan - August 20, 2018.** P3 filed comments regarding the PA Solar Plan on August 20, 2018, urging the PA DEP to reject certain proposals such as utility ownership of solar generation and an increase in the AEPS requirements. [MORE](#)

**P3 Filed Initial Brief with Supporting Affidavit from Dr. Roy Shanker Urging FERC to Adopt a Clean MOPR For the PJM Capacity Market – October 2, 2018.** On October 2, 2018, P3 filed comments with a supporting Affidavit from Dr. Roy Shanker urging FERC to adopt a Minimum Offer Pricing Rule applicable to all materially subsidized resources without categorical exemptions ("Clean MOPR") while preserving the ability of states to procure their own capacity resources through PJM's existing Fixed Resources Requirement ("FRR") mechanism. [MORE](#) **On November 6, 2018, P3 Filed Reply Brief with FERC Reinforcing The Need For A Clean MOPR For PJM's Capacity Market** [MORE](#)

**P3 Filed Comments on NJ's 2019 Energy Master Plan – October 12, 2018.** P3 filed comments encouraging New Jersey to pursue its environmental goals through means that do not undermine the benefits of competitive markets, but rather either directly recognize the price of a pollutant in the wholesale energy market (PJM's proposal) or indirectly reflect the cost of pollutant-specific regulation or cap and trade programs in the wholesale market price. [MORE](#)

**P3 Filed Supportive Comments at FERC Regarding PJM's FTR Default Filings – October 22, 2018.** P3 filed supporting comments regarding PJM's proposed tariff revisions regarding FTR Default Filings. P3 supported PJM regarding the Default Disposition Filing, the Bilateral Transaction Indemnification revisions, the Default Allocation Assessment revisions, as well as the extension of waiver if FERC rejected or posted the effectiveness of the Default Disposition Filing beyond December 1, 2018. PJM proposed the revisions in these filings that as a result of the GreenHat Energy default. [MORE](#)

**P3 Filed Comments and Limited Protest with Expert Testimony in PJM Quadrennial Review - November 19, 2018.** P3 filed extensive testimony at FERC supporting PJM's position that the combustion turbine is the appropriate reference technology for purposes of calculating the cost of new entry to establish the demand curve for capacity auctions. P3 protested all of PJM's proposed capacity assumptions with extensive testimony from Tanya Bodell, Energyzt on the issue. [MORE](#)  
**P3 Answered Protests on PJM Quadrennial Review Filing - December 4, 2018.** P3 filed a Motion to Leave to Answer and Answer regarding the IMM and coalition of Public Entities protests in the PJM Quadrennial Review filing. [MORE](#)

**P3 Joined by EPSA, Urged FERC To Accept Its Requested Modifications To PJM's Proposed Tariff Amendments Regarding Generation Maintenance Adder Costs – November 19, 2018.** [MORE](#) **P3 joined by EPSA, Answered Protests on PJM Maintenance Adder Filings - December 4, 2018.** P3 joined by EPSA, filed a Motion to Leave to Answer and Answer regarding the IMM and OPSI protests in the PJM Maintenance Adder filings. [MORE](#)

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## P3 LEADERSHIP

**Glen Thomas**

**Laura Chappelle**

**Diane Slifer**

## P3 BOARD

**Chair: John Reese, Eastern Generation, LLC**

**Treasurer: Neal Fitch, NRG**

**Secretary: Debra Raggio, Talen Energy**

**Glen Thomas** is president of PJM Power Providers Group (P3 Group), a non-profit organization made up of power providers with the mission of promoting competitive wholesale electricity markets in the 13-state region and the District of Columbia served by PJM Interconnection.

Mr. Thomas is the former chairman of the Pennsylvania Utility Commission (PUC) where he oversaw the restructuring of Pennsylvania's electricity, natural gas, and local telephone markets. Before his appointment to the PUC, Mr. Thomas served as Deputy Director of Governor Ridge's Policy Office, where he advised the Governor on energy and environmental issues. In addition, Mr. Thomas was appointed by California Governor Arnold Schwarzenegger to serve on the Governor's transition team for energy related issues in 2003. Mr. Thomas is also a former partner at the law firm of Blank Rome.

Mr. Thomas has served as President of the Mid-Atlantic Association of Regulatory Utilities Commissioners; Chairman of the National Association of Regulatory Utility Commissioners Washington Action Committee; member of the U.S. Department of Energy's Electricity Advisory Board; the National Regulatory Research Institute's Board of Directors; the Keystone Center Energy Board; the Organization of MISO States Board of Directors; and the National Association of Regulatory Utility Commissioners Committee on International Relations, Telecommunications and Critical Infrastructure.

**Laura Chappelle** is a former Chairman and Commissioner of the Michigan Public Service Commission (MPSC). Appointed by Governor John Engler as Chairman of the MPSC in 2000, Ms. Chappelle took an active role in state energy and telecommunications regulations, including the drafting and implementation of both Michigan's electric restructuring law, as well as Michigan's nationally-recognized "Broadband" law that, in part, coordinated and streamlined local and state right-of-way regulations for telecommunications and Internet providers. She was also active in regional and federal energy issues. Ms. Chappelle's leadership includes an active role in the development and implementation of the Organization of MISO States (OMS), and the Organization of PJM States (OPSI), the first FERC-approved "multi-state entities."

During her six-year tenure with the MPSC, Ms. Chappelle served as the Vice-Chair of the National Association of Regulatory Utility Commissioners' (NARUC) Committee on Electricity, the Treasurer and President of the OMS, the Vice-President of OPSI, the Chair of NARUC's Broadband over Power Lines Task Force, and was a member of the U.S. Department of Energy's Electricity Advisory Board. Prior to her appointment to the Commission, Ms. Chappelle served as deputy legal counsel and regulatory affairs advisor for Governor John Engler. She also served as an attorney/legal advisor in



both the Michigan House of Representatives and the Michigan Senate. Ms. Chappelle began her legal career as an assistant prosecuting attorney with the Saginaw County Prosecutor's Office.

Ms. Chappelle is currently an independent consultant working, in part, with the PJM Power Providers Group. She assists with filings, as well as strategic communications with state commissioners and staff. She also continues to be active in the legal arena, working as Counsel with the Varnum law firm and having served a three-year term as a Michigan Supreme Court designee to the Michigan State Bar Association's Board of Commissioners. She has also served as an Associate Professor of energy law with the Thomas M. Cooley Law School and as an Adjunct Professor at the Michigan State University College of Law. She is a founding member of the Advancing Women in Energy association and currently serves as its Secretary. She is also serving as the Chair of the State Bar of Michigan Administrative & Regulatory Law Section.

**Diane Slifer** is currently an independent consultant working, in part, with the PJM Power Providers Group. Ms. Slifer previously worked as a regulatory and business attorney for two prominent national law firms, Blank Rome LLP and Duane Morris LLP. Ms. Slifer has also written numerous articles and has given presentations regarding regulatory as well as privacy and data security issues to various groups, including the Payment Cards Center of the Federal Reserve Bank in Philadelphia. Having both JD and MBA degrees, Ms. Slifer's legal background is complimented by her previous business experience as an accountant at a major national accounting firm, Coopers & Lybrand, and her experience gained while serving in various management, strategic planning, teaching and consulting capacities at LaSalle University.

Ms. Slifer was one of thirty lawyers selected throughout Pennsylvania in 2004 as a "Lawyers on the Fast Track" recipient. In 2005, Ms. Slifer was invited to serve on the 2005 Presidential Rank Award Meritorious Review Board, and additionally that year, she was selected for induction into the Lower Mereland High School Hall of Fame. In 2002, she was one of nineteen women chosen across Pennsylvania to participate in the inaugural class of the Anne Anstine Excellence in Public Service Series, a state-wide woman's leadership program. She has been a member of the Women's Council on Energy and the Environment (WCEE). As a testament to her leadership abilities and commitment to the community, Ms. Slifer has been appointed and currently serves on several boards, including serving as the President of the Villanova University School of Law Alumni Association.

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