

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C.

)

Docket No. ER25-712-000

COMMENTS
OF THE PJM POWER PROVIDERS GROUP

Pursuant to the December 16, 2024 Combined Notice of Filings #1 and the December 23, 2024 Notice of Extension of Time issued by the Federal Energy Regulatory Commission (the “Commission” or “FERC”) in the above-captioned proceeding, the PJM Power Providers Group¹ (“P3”) submits these comments² in response to the December 13, 2024, section 205 of the Federal Power Act, Tariff Revisions for Reliability Resource Initiative (“RRI”) filing by PJM Interconnection, L.L.C. (“PJM”). The PJM filing proposes to modify Part VII of its Open Access Transmission Tariff (“Tariff”) to add provisions enabling a one-time reliability-based expansion of the eligibility criteria for Transition Cycle #2 so that a very limited number of additional resources needed to rapidly address PJM’s near-term reliability challenge may be considered in that Cycle while still keeping Transition Cycle #2 on track for timely completion (“PJM RRI Filing”).³

¹P3 is a non-profit organization dedicated to advancing federal, state and regional policies that promote properly designed and well-functioning electricity markets in the PJM Interconnection, L.L.C. (“PJM”) region. Combined, P3 members own over 83,000 MWs of generation assets and produce enough power to supply over 63 million homes in the PJM region covering 13 states and the District of Columbia. For more information on P3, visit www.p3powergroup.com.

²The comments contained herein represent the position of P3 as an organization, but not necessarily the views of any particular member with respect to any issue. On December 18, 2024, P3 filed a doc-less Motion to Intervene.

³ *PJM Interconnection, L.L.C.*, Docket No. ER25-712-000 (filed December 16, 2024) (“PJM RRI Filing”).

I. COMMENTS

P3 supports PJM's RRI Filing and urges the Commission to approve it. This one-time initiative represents a unique opportunity to bring meaningful capacity to the PJM region in relatively short order while PJM transitions to interconnection protocols that are more capable of handling future requests. P3 recognizes that there may be improvements that can be made to the PJM RRI Filing and there are certain aspects of the filing in which PJM had to use its discretion; however, overall, the filing is just and reasonable and offers the Commission an answer to PJM's call to arms of "we need UCAP and we need it fast."⁴

PJM proposes to open a one-time window for a limited number of projects that meet certain criteria to enter Transition Cycle #2, and thereby potentially allowing these projects to come online earlier than they may have otherwise. PJM seeks to identify a limited number of "high-reliability value projects" and provide these projects an opportunity to enter the queue at an advanced stage provided those projects are willing to make certain commitments to PJM to ensure their availability.

PJM's witness, Donald Bielak, offers a compelling explanation of the changing supply/demand dynamics in PJM and how the RRI filing could help PJM address the looming challenges. Importantly, he offers that he has, "...reasonable confidence that the RRI process will attract applications from multiple projects, representing at least as much as 10 GW of reliable resources for the PJM Region."⁵ The addition of these megawatts will have a material

⁴ See PJM RRI Filing, Attachment C Affidavit of Mr. Donald Bielak on Behalf of PJM Interconnection, L.L.C. ("Bielak Affidavit") at ¶ 10.

⁵ See Bielak Affidavit at ¶ 21.

impact on PJM's reliability metrics, and providing an accelerated path for these resources to come to market is a worthy goal that the Commission should embrace.

As noted, P3 appreciates that the PJM RRI Filing may not be perfect in every respect and that improvements can be made to it. P3 also does not necessarily agree with all of PJM's justifications offered in support of the filing. However, considering this is a one-time PJM initiative and the need for timely FERC resolution is paramount, the filing is within the zone of just and reasonableness such that it warrants Commission approval. Furthermore, P3 would not object to improvements from the Commission that are consistent with PJM's overall goal of providing an accelerated path for high reliability projects that can achieve commercial operations quickly.

II. CONCLUSION

P3 respectfully requests that the Commission consider P3's comments above and approve the PJM RRI Filing consistent with these comments.

Respectfully submitted,

On behalf of The PJM Power Providers Group

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January 8, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on each person designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

Dated at Washington DC, this 8th day of January, 2025.

On behalf of The PJM Power Providers Group

/s/ Diane Slifer
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