October 1, 2014

PJM Interconnection
VIA EMAIL: capacityperformance@pjm.com
2750 Monroe Boulevard
Audubon, PA 19403

RE: Winter Reliability Plan

PJM Board and Staff:

Environment Ohio is a statewide, citizen-based environmental advocacy organization. Through research and public education efforts, we take action to win tangible results for our environment.

We are writing today to stand alongside others in expressing our concern about PJM’s recently released Performance Capacity proposal. Specifically, we join the Sierra Club, NRDC, Audubon Society, Environmental Defense Fund and others who believe that the proposal is disruptive and unfairly penalizes renewable energy and energy efficiency.

PJM should propose changes that increase reliability in way that is much less disruptive to consumers, reduces pollution, and is forward-looking with regard to changes in the energy marketplace. Clean energy policies, new technology, and customer preferences are driving significant investment in lower-cost and clean renewable energy resources, rooftop solar, and other distributed generation and energy efficiency. Energy efficiency and renewable energy have demonstrated capacity value and will be required to meet state and federal standards.

PJM should adapt to meet these changes. As you move forward with the review process, I urge you to table the current proposal and find solutions that reflect this reality.

We certainly need reliable energy during the coldest winter days, but the opposition to PJM’s first draft is a clear sign that this plan is not the answer.

Sincerely,

Christian Adams
State Associate
Environment Ohio

cc:
Governor John Kasich
Ohio Attorney General Mike DeWine
Bruce Weston, Office of Ohio Consumers' Counsel