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Board of Directors

March 19, 2024

Ben Adams
MaGrann Associates

Mr. Manu Asthana, President & CEO

Baird Brown
Eco(n) Law

Mr. Mark Takahashi, Chair, PJM Board of Managers on behalf of the entire Board of Managers
PJM Interconnection

Tejas Desai
Tri-State Lighting

PO Box 1525
Southeastern, PA 19399-1525

Paul Douglas
The JPI Group

Dear PJM Leadership Team:

Julie deSeve
CLEAResult

As energy efficiency businesses and supporters, we are writing to express deep concern about the pace and nature of the prospective changes to energy efficiency resources that are accepted into the PJM capacity market.

Andy Frank
Sealed

Peter Krajsa
National Energy Improvement Fund

Our industry and our country are at a critical juncture in planning and coordinating grid reliability, decarbonization and state-level programs. We believe a deliberative process rather than a process that is both closed and needlessly swift since its start in early February of this year could cause more disruption and harm than good.

Fred Maher
CMC Energy Services

Elizabeth McQuaide
Franklin Energy

Because the impact will be significant and could potentially be deleterious to utilities and ratepayers (including impacting even the use of Technical Resources Manuals of PJM states), we urge a more thoughtful, open, and deliberative and slowed-down process.

Nancy Mifflin
Mifflin Consulting, LLC

Joe Nunley
Performance Systems Development

We ask that any scheduled vote for proposed manual 18(b) changes be taken off the Markets and Reliability Committee agenda for March 20, and further that it be delayed until PJM provides an appropriate forum for all energy efficiency stakeholders - including ratepayers, utilities, state utility commissions, and the energy efficiency industry to understand the complex issues being considered and be given the opportunity to provide comments.

Renwick Paige
Energy Infrastructure Partners

Jared Shari
ABCO HVACR

The Federal Energy Regulatory Commission (FERC) has, on several occasions, concluded that energy efficiency should be treated on par with other resources

serving FERC-jurisdictional markets. More specifically, FERC has determined that energy efficiency plays an important, positive role in PJM's markets.

Given the recent FERC Order No. 2222, which requires PJM to remove barriers to DER participation in its wholesale electricity markets through allowing DERs to aggregate output, forming DER Aggregations ("DERAs"), we think a deliberative process is particularly salient and needed at this time.

Lastly, we welcome an open, full dialogue to appropriately examine how energy efficiency resources are considered as part of the load forecast, and we appreciate your consideration and voice in this matter.

Sincerely,



Jeaneen A. Zappa
Executive Director, Keystone Energy Efficiency Alliance

on behalf of the additional under-signed organizations listed below:

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|---------------------------|--------------------------------|
| Bar Hygge | Vanguard Energy Solutions, LLC |
| Bright Power | Advanced Energy United |
| Capital Access, Inc. | Ceres |
| Celentano Energy Services | Clean Air Council |
| CMC Energy Services | Conservation Voters of PA |
| CPower, Inc. | Energy Efficiency |
| DMI Companies | Empowerment |
| eco(n)law LLC | Environment New Jersey |
| Encentiv Energy | Jewish Earth Alliance PA |
| Envinity, Inc. | Mobilify Southwestern |
| Green Energy Economics | Pennsylvania |
| Group, Inc. | Pennsylvania Solar Center |
| M&E Engineers, Inc. | Pennsylvania Utility Law |
| MaGrann Associates | Project |
| Pearl Certification | Philadelphia Solar Energy |
| Performance Systems | Association |
| Development | Pittsburgh Gateways |
| Sealed | Corporation |
| Solstice Home Performance | Sustainable Business Network |
| The JPI Group | of Greater Philadelphia |
| Uplight | Vote Solar |
| Utility Advantage, LLC | |