



May 27, 2025

Mr. Manu Asthana
President & CEO

PJM Interconnection, LLC
2750 Monroe Boulevard
Audubon, Pennsylvania 19403

Dear Mr. Asthana:

The undersigned states are writing to express our concerns about the direction of PJM’s FERC Order No. 1920 compliance process. Consumers in our states are currently experiencing significant electricity cost increases and challenges related to increased demand which are attributable, in part, to PJM’s underbuilt transmission system and failure to interconnect new, lower cost generation to the grid in a timely manner.

We are concerned that PJM’s proposed Order No. 1920 compliance plan is overly complicated and fails to holistically address reliability and affordability issues, nor to adequately account for state energy policies that are the heart of lowering costs for our constituents. We respectfully request that PJM adjust its compliance activities and timeline as needed to address our concerns.

We note that PJM’s compliance proposal does not appear to reflect the guidance offered in the October 25, 2024 letter from several PJM Governors to the Board. In particular, we are deeply concerned that the PJM proposal does not plan for **all** state energy policies but instead subdivides them into “core” and “additional” long-term needs. Policies to support advanced nuclear, offshore wind, energy storage, and other resource-specific generation procurement targets, are fundamental building blocks of our energy future and should not be accorded second-class treatment. A proposal that fails to adequately plan transmission needs triggered by these state policies is unacceptable and likely noncompliant with the requirements of Order No.1920. Further, the subdivision of needs into “core” and “additional” long-term needs will likely result in lines that can save ratepayers money never being built. Economic benefits of transmission lines must be considered as they will result in cost savings to our citizens who face increasing electricity bills. PJM’s proposal fails to identify least-regrets transmission by default, while the transmission needs selected are not guaranteed to be cost-effective.

We respect how difficult it is to develop a durable and stable long-term transmission planning process. However, other regions have successfully done so. We observe that the successful transmission planning [process](#) in the Mid-Continent region and the promising [approach](#) underway in New England demonstrate that a portfolio of transmission projects that facilitate state economic and infrastructure development goals can be successful. On the other hand, PJM’s initial proposal appears to forego the foundations of these approaches in favor of a project-by-project approach that seems unlikely to result in the holistic approach to transmission planning that Order No. 1920 requires.



Given these serious concerns around PJM's initial proposal, we recommend that PJM recommit to a productive dialogue with its state partners on its compliance approach, including bringing in a mediator or neutral facilitator to aid in these discussions. Further, a reset would allow PJM an opportunity to respond to our concerns as well as provide the opportunity for PJM states to explore greater alignment around transmission expansion that best serves our constituents. A successful long-term transmission planning process should result not only in a high level of system reliability, but also faster deployment of new power plants, and savings for consumers. We look forward to working with PJM management, staff, and stakeholders in shaping regional transmission planning and cost allocation approaches to achieve these goals.

Sincerely,

Illinois

[Office of the Governor]

Maryland

[Office of the Governor]

New Jersey

[Office of the Governor]

Delaware

[Office of the Governor]

Michigan

[Office of the Governor]

cc: PJM Board of Managers