

David E. Mills
Chair, PJM Board of Managers
PJM Interconnection, L.L.C.
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U.S. PIRG
Education Fund



Dear Chairman Mills and PJM Board of Managers,

As you consider the various stakeholder proposals for the current Critical Issue Fast Path (CIFP) process for Large Load Additions, the undersigned organizations wish to draw your attention to one particular facet of PJM's proposal, the Expedited Interconnection Track (EIT). We urge you not to include this unnecessary and biased fast-track mechanism in your final proposal.

Over the past several years, PJM has had some of the longest wait times in the country for interconnection of new power generation.¹ Projects waiting in the queue during this time— 98% renewable energy resources²— have waited years for PJM to make desperately needed changes and start processing the backlog. Projects that became operational in 2025 spent more than eight years in the queue on average waiting for PJM approval.³

While PJM has made important reforms to speed the process up, its improved timeline for interconnection is still significantly longer than experts recommend.⁴ Should it choose to implement them, there are tools at PJM's disposal to modernize its process and speed up that timeline, so that new projects can respond to increased demand and provide the reliable power we need quickly, rather than stalling out and losing financial viability as they wait years for PJM approval.

Instead, PJM is proposing another shortsighted fast-track. Fast-track processes, like last year's supposedly one-time-only Reliability Resource Initiative and the EIT that PJM is proposing now, are not just band-aid solutions that circumvent the underlying problem, they also contribute to further delays. Even PJM acknowledges that a parallel process like the EIT will impact the regular cycle processing timeline.⁵

¹ John Wilson, *Generator Interconnection Scorecard*. Advanced Energy United. (February 2024). [https://advancedenergyunited.org/hubfs/2024%20Advanced%20Energy%20United%20Generator%20Interconnection%20Scorecard%20\(1\).pdf](https://advancedenergyunited.org/hubfs/2024%20Advanced%20Energy%20United%20Generator%20Interconnection%20Scorecard%20(1).pdf)

² Claire Wayner, *The Ongoing Struggle to Join PJM's Grid*. RMI. (July 24, 2023). <https://rmi.org/ongoing-struggle-to-join-pjms-grid/>

³ Abigail Weeks, *PJM's Speed to Power Problem and How to Fix It*. RMI. (November 4, 2025). <https://rmi.org/pjms-speed-to-power-problem-and-how-to-fix-it/>

⁴ Will Gorman, *Transmission Interconnection Roadmap*. U.S. Department of Energy (April 2024). <https://www.energy.gov/sites/default/files/2024-04/i2X%20Transmission%20Interconnection%20Roadmap.pdf>

⁵ Tim Horger, *Large Load Additions CIFP Update*. PJM Interconnection. (October 1, 2025) <https://www.pjm.com/-/media/DotCom/committees-groups/cifp-lla/2025/20251001/20251001-item-04---cifp---lla-updates---pjm-presentation.pdf>

While technically resource-neutral, the EIT's 500 MW minimum requirement creates a clear advantage for large thermal generators like gas plants. PJM putting its thumb on the scale for large fossil generators is anti-competitive, creates unnecessary potential for increased air and climate pollution, and prioritizes projects that are often slower to build than cleaner alternatives.⁶

As it navigates how to add new large loads to its grid, PJM now more than even needs to focus on building a modern grid that is capable of powering the 21st century. That means fixing its broken processes and prioritizing allowing the energy and battery storage projects that have been waiting for years to come online and supply clean, reliable power to electricity consumers in PJM.

We urge you not to include the EIT, or any other fast-track mechanism in your final decision on the large load CIFP. The 67 million Americans living in the PJM region deserve a grid that is reliable and functional, and that doesn't put its thumb on the scale for dirty power.

Thank you for your consideration,

Theo Rosen
Environment America Research & Policy Center

Environment Virginia Research & Policy Center

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Illinois PIRG Education Fund

PennEnvironment Research & Policy Center

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Environment Maryland Research & Policy Center

Maryland PIRG Education Fund

Environment New Jersey Research & Policy Center

NJPIRG Education Fund

Environment North Carolina Research & Policy Center

NCPIRG Education Fund

Environment Michigan Research & Policy Center

PIRGIM Education Fund

⁶ Energy Innovation: Policy and Technology. *Solar-Plus-Storage: The Fastest, Cheapest Way To Meet Surging Power Demand*. Forbes. (March 18, 2025).
<https://www.forbes.com/sites/energyinnovation/2025/03/18/solar-plus-storage-the-fastest-cheapest-way-to-meet-surging-power-demand/>