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David E. Mills
Chair, PJM Board of Managers
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19043

Manu Asthana
President & CEO
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
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Dear Chair Mills, Mr. Asthana and the PJM Board of Managers:

Apex Clean Energy Holdings, LLC (Apex) appreciates the opportunity to submit these comments to the PJM Board of Managers following the PJM Critical Issues Fast Path – Large Load Additions (CIFP – LLA) Stage 4 meeting.

Apex understands that an anticipated onrush of demand has created significant upward pricing pressure and has raised future resource adequacy concerns. Some of the ideas presented by the PJM staff and stakeholders will make much needed enhancements to the current PJM processes. Namely, the load forecasting enhancement proposal and enhanced demand flexibility proposal should help protect ratepayers from rising power bills created by the anticipated large load additions.

However, as the PJM Board of Managers' August 8, 2025, letter states, "PJM's 2022 interconnection queue reform has resulted in the processing of over 140,000 MW[s] of queued generation projects. A total of 46,000 MW[s] of new generation have signed interconnection agreements and are ready to [be] construct[ed]. The remaining interconnection transition queue **is expected to be completely cleared over the next six to eighteen months** (emphasis added)."

Apex does not believe that a **new parallel permanent Expedited Interconnection Track (EIT)** for generation (whether paired with load or not) is needed nor is it appropriate. Creating such a queue-jumping process would harm the interconnection customers that have been in the existing queue for many years. **Creating a separate parallel expedited**

process would be unjust, unreasonable and unduly discriminatory. As the PJM Board letter indicates, PJM should focus on expeditiously processing the current queue and clearing the existing backlog of generation projects ready to be constructed and connected to the grid.

It was not long ago that PJM implemented the Reliability Resource Initiative (RRI) as a "one-time" intervention to quickly bring new needed generation online. Now it is proposing a regular, permanently occurring fast-track process. The permanent nature of this proposal is very troubling. PJM should focus on processing the current interconnection queue as quickly as possible rather than creating an unfair and unjust parallel process.

PJM has not addressed whether the proposed fast track will cause delays for current cluster studies or whether the interconnection fast track may increase network upgrade costs for projects in study clusters. Any expedited process will almost certainly cause harm to the existing queue participants. Even PJM staff acknowledged this on page 5 of its original proposal presentation dated October 1, 2025 (***"It is important to note that any parallel process will impact the Cycle Process. The goal is to have a minimal impact"***).

This concern of harming the existing queue has been recognized by other stakeholders. Although not a comprehensive compilation, following are some of the comments submitted by other stakeholders for the CIFP – LLA Stage 4 meeting.

MAREC Action, a coalition of utility-scale solar, wind, and energy storage developers, is "particularly concerned about the EIT proposal and do[es] not believe it to be necessary or (as proposed) equitable." It emphasizes that the EIT proposal will impact currently queued projects, many of which have been waiting for years to get their studies completed and costs stabilized. The change to a 250 MW UCAP minimum along with PJM's ELCC calculation methods "will make it virtually impossible for renewable developers to participate."

As MAREC Action states, making this a permanent system "will lead to renewable resources becoming permanent second-class citizens continually bearing the brunt of the impacts on interconnection and network upgrade cost responsibility."

Advanced Energy United opposes the EIT, stating that "PJM's proposal includes an EIT that would allow up to 10 projects per year that have received "state sponsorship" and meet other eligibility criteria to proceed through a separate, 10-month expedited interconnection process. This action risks creating a discriminatory fast-track for certain resources while slowing down and taking interconnection capacity away from the regular interconnection process."

Even the **Michigan Public Service Commission** does not support bypassing the existing interconnection queue processing (see footnote 3 of the OPSI Staff Position Statement on CIFP, dated November 10, 2025).

In sum, the Expedited Interconnection Track as proposed by PJM will adversely impact the existing queue and unduly discriminate against renewable resources.

The CIFP-LLA process was initiated by the PJM Board to address a pressing resource adequacy concern, and the letter notes that solutions could be “transitional in nature, permanent or a combination of the two.” If an Expedited Interconnection Track process is pursued, it is imperative that it be limited in duration. The longer an expedited process is in effect, the more harm will be caused to generation interconnection customers entering the standard queue cycles.

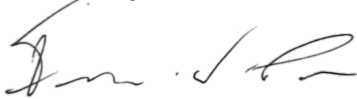
At the very least, the EIT proposal should be modified such that:

- It is limited to periods when PJM’s Installed Reserve Margin (IRM) is not consistently met and should be sunset once consecutive BRAs meet or exceed the required IRM.
 - Alternatively, Apex believes that a hard sunset date of one year should be imposed.
- Additionally, the minimum project size must be reduced to allow a broader range of renewable energy resource types to participate.
 - The minimum project size should be lowered to 50 MW UCAP.

We realize that the PJM Board of Managers has tough decisions to make, especially since there was such diverse feedback from the Members Committee voting results at the Stage 4 meeting -- with no package receiving the necessary votes to surpass the voting threshold. But as currently proposed, the EIT creates a separate parallel expedited process that would be unjust, unreasonable and unduly discriminatory.

Apex appreciates the opportunity to submit these comments.

Sincerely,



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