



Mr. David Mills
Interim President and CEO and Chair, PJM Board of Managers

PJM Interconnection, LLC
2750 Monroe Boulevard
Audubon, Pennsylvania 19403

Dear Mr. Mills and Members of the PJM Board,

On behalf of the over nine million residents of Illinois and 9 million residents of New Jersey served by PJM Interconnection, we write to offer our concerns pertaining to the proposed Expedited Interconnection Track (EIT) Tariff.

PJM's proposed EIT would allow for a secondary interconnection queue to study projects that meet targeted requirements to address the rapidly increasing demand growth across the PJM footprint, as called for by the principles on large load signed by all 13 PJM Governors.

However, setting a minimum eligibility requirement of 250 MW Unforced Capacity (UCAP) does not align with the intended goal of fixing the near-term capacity crisis and limits the ability of the EIT to relieve resource adequacy concerns, to improve affordability, and to support economic development.

In particular, the current threshold arbitrarily excludes resources that may be able to provide capacity at a lower price or on a faster timeline. For example, through the recent passage of [Illinois Public Act 104-0458](#) (also referred to as the Clean and Reliable Grid Affordability Act), the State of Illinois is committed to supporting the development of 3,000 MW of new battery energy storage resources coming online by the end of 2030. New Jersey has similar energy storage initiatives through its Garden State Energy Storage Program, which seeks to deploy 2,000 MW of energy storage capacity by 2030. The lack of market rules for the treatment of storage along with the proposed threshold would likely exclude these projects, deprioritizing their interconnection over resources that may take longer to provide urgently needed relief.

PJM should amend the proposed tariff to reduce the eligibility threshold to allow all resource types to take advantage of the EIT and include explicit provisions that allow for battery energy storage systems to participate while the market rules are still in the process of being drafted and adopted. Failing that, PJM should consider project in-service date as well as UCAP to account for the urgency of our capacity needs; should clarify the treatment of hybrid resources and aggregate the size of projects using the same point of interconnection to reflect shared interconnection needs; and should further reduce the size threshold if fewer than ten qualifying projects are identified.



Additionally, the proposed approach to identify “state sponsored” projects is not feasible for Illinois, New Jersey and likely problematic for other states as well. As in most states, permitting and siting relies on a network of laws and regulations from the federal, state, and local government. It is unlikely that a state agency has the authority to signal that it plans to expedite permitting unless already required to in existing statutes. Any proposal to create an expedited interconnection queue must work for the entirety of the PJM region, thus PJM should revise the proposed tariff to work for all of its members’ service territories.

We urge PJM to act upon this request to ensure that the EIT results in the mix of resources best equipped to rapidly and cost-effectively address our capacity needs and to ensure the long-term stability of the grid for customers.

Sincerely,

Sincerely,

A handwritten signature in black ink, appearing to be "R. Rauner".

A handwritten signature in blue ink, appearing to be "Chris Christie".

Illinois

Office of the Governor

New Jersey

Office of the Governor