October 28, 2026
David Mills, President and CEO
Paula Conboy, Chair, Board of Managers
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403

Via E-mail to: David Mills, President and CEO
Jennifer Tribulski, Members Committee Secretary

Dear Chair Conboy, Mr. Mills, and the PJM Board of Managers,

The American Clean Power Association ("ACP") writes on behalf of our members regarding PJM's proposal to study all generator interconnection requests and large load transmission service requests in a single annual cluster (the "Combined Queue," which PJM now calls "Fast Energization"), and the PJM Transmission Owners' ("TOs") related cost allocation methodology.

ACP supports PJM's efforts to meet the needs of a rapidly evolving grid. However, as presently contemplated, the Combined Queue puts at risk the progress PJM has made since FERC approved its 2022 transition to a first-ready, first-served cluster study process. In particular, the Combined Queue could materially slow generator interconnection precisely when new generation is most needed. Large load brings a materially different risk and uncertainty profile than the generation PJM's previous reforms were built around, and PJM has not shown how it will preserve the timelines those reforms achieved. ACP's principal concerns are:

1. **Scope Beyond the Show Cause Order:** The Combined Queue would move most large-load-driven transmission needs out of the Supplemental Project construct and into a single cluster with all generator interconnection requests, regardless of electrical proximity. FERC's June 18, 2026 Show Cause Order does not require this.[1] As to generation, the order addresses only interconnection customers serving electrically proximate or co-located large load, not the entire generation queue. Generators' full deliverability could instead depend on extensive cluster-wide upgrades, delaying construction and slowing the path to commercial operation even with a shorter study timeline.
2. **Cost Allocation:** Under the methodology described in the TOs' October 9, 2026 consultation notice, each cluster's portfolio of upgrades would be allocated among generators and load zones using a "portfolio-based" version of PJM's proportional

[1] *PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,211 (2026) ("Show Cause Order").

impact methodology.[2] Without upgrade-specific cost causation, generators risk paying for upgrades driven predominantly by large load, and cannot know their cost responsibility at PJM's proposed decision points because it would depend on the entire portfolio, including higher-attrition load requests.

3. **Rate-Base Funding of Generator Upgrades:** Per the October 9 Consultation, all portfolio upgrades would enter TO rate base. Generators would pay a fee amortized over 15 to 20 years plus an undefined carrying charge, beginning no later than the generator's in-service date whether or not the upgrades are in service, while still posting full security. If the carrying charge includes the TOs' return on equity, taxes, and debt costs, generators will pay more for the same upgrades, costs that ultimately reach consumers; if not, the shortfall falls on load. The TOs hold the cost allocation filing rights, but generators cannot evaluate PJM's Combined Queue without knowing what they will pay.
4. **Site Control and Readiness Requirements:** PJM has made constructive changes to its site control proposal in response to stakeholder concerns, but significant issues remain. PJM has not demonstrated why existing site control requirements are insufficient or why developers should have to secure a unilateral right to extend site control 15 years beyond commercial operation. That requirement could create unnecessary commercial and financial burdens, particularly for projects still refining site configurations during engineering and permitting. PJM would also require nonrefundable study deposits and readiness deposits, even though PJM has not yet defined the generation-specific amounts at risk at each decision point. Viable projects would be forced out, and attrition-driven restudies would slow the rest. Readiness requirements should step up as studies progress and allow modifications that do not materially affect study results.
5. **Unproven Modeling and Computing Capability:** ACP supports PJM's use of automation and improved modeling, but the tools described are not yet validated at scale and the proposal ties escalating financial milestones to a compressed decision window built around them. PJM should pilot and validate these tools within the existing Cycle 1 process first.
6. **November Filing Timeline:** PJM and the TOs plan separate filings under Section 205 of the Federal Power Act by November 16, 2026, with stakeholder comments on the TOs' methodology due November 9, before PJM's tariff language is complete; PJM's draft redlines still contain placeholder dates, deposit amounts, and decision-point durations. That schedule leaves no time to evaluate the Combined Queue and its cost

[2] Notice of PJM Transmission Owners Consultation with the Members Committee Regarding Proposed Revisions to the PJM Tariff, Section D (Oct. 9, 2026) ("October 9 Consultation").

allocation together, validate the tools, or test the claimed benefits of consolidation. The Show Cause Order invited, but did not require, Section 205 filings; nothing compels PJM to file the full Combined Queue proposal now.

ACP commends PJM's progress on interconnection reform and its willingness to develop creative solutions, and looks forward to partnering with PJM on future reforms. As to the Combined Queue, however, PJM should demonstrate—rather than assume—that it will provide the benefits PJM describes and will not simply shift cost and timing risk onto generation. ACP therefore respectfully requests that the Board direct PJM staff to:

(a) Limit the November 16 filing to a targeted response to the Show Cause Order and develop any broader consolidation through the full stakeholder process;

(b) Not file a consolidated study process until its cost allocation and recovery methodology has been vetted with stakeholders;

(c) Validate the modeling and automation tools in the existing Cycle 1 process before tying financial milestones to them; and

(d) Develop readiness requirements and decision timelines that are workable for project financing.

Thank you for your consideration of this letter and your work on this crucial effort.

Sincerely,

/s/ Brett White

VP Markets and Transmission
American Clean Power Association

The American Clean Power Association (ACP) is the leading voice of today's multi-tech clean energy industry, representing energy storage, wind, utility-scale solar, and transmission companies. ACP is committed to meeting America's energy and national security goals and building our economy with fast-growing, low-cost, and reliable domestic power.