

To: PJM

From: Illinois Commerce Commission Staff

Re: Request for Feedback on TEAC Special Session

Date: October 18, 2024

Illinois Commerce Commission Staff (Staff) appreciates PJM's request for feedback on assumptions regarding PJM's 1920-driven resource deactivations. Staff notes PJM's commitment to conferring with the states and encourages PJM to follow through with such consultations, as the states will likely have the in-depth knowledge concerning any deactivations that may occur due to legislation that each state has adopted and other relevant provisions that may be required under the law. For example, Illinois's Climate and Equitable Jobs Act, Public Act 102-0662, has specific requirements regarding the retirement of fossil-fired resources, as well as exemption provisions for similar resources necessary to maintain reliability in Illinois.

Staff also encourages PJM to account for and consider the impact of new or potential generation resources that will likely come online during the same time period as any identified resource deactivations. Recognizing these new resources that are scheduled to be built is equally as important as identifying resources that will be retired. This analysis may mean considering resources beyond those already in the interconnection queue.