



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120

October 18, 2024

Via Electronic Mail Only
Michele.Greening@pjm.com

Dear Ms. Greening:

In response to your request on October 1, 2024, for stakeholders' feedback on policy-driven deactivation policies, the Pennsylvania Public Utility Commission offers the following responses to some of your questions.

1. Impacted resources complying with policies

a) Should there be a process for generation owners and/or states to demonstrate that a resource impacted by a policy intends to comply and therefore remain in operation beyond the compliance date?

Answer: Yes, that would be helpful to PJM and State entities for our planning needs.

b) If so, what should the criteria be for generation owners and/or states to sufficiently demonstrate that a resource intends to comply with a policy and not otherwise be considered for planned retirement?

Answer: As soon as a generation owner decides to comply with a policy and not otherwise retire a facility, it should notify PJM within a reasonable time period.

State policies that are either passed by legislature and signed by governor, or executive orders for which the appeals process has been exhausted, should be deemed final. PJM should assume that generators subject to such final policies will comply with them unless informed of retirement plans.

2. Corporate retirement commitments

These are publicly announced deactivations made by generation owners but are still "unofficial" (meaning they have not submitted a deactivation notice to PJM)

a) How should a process work for obtaining awareness of private retirement commitments made by generation owners without an official deactivation notice submitted to PJM?

Answer: PJM could poll its generation owners periodically for feedback. Alternatively, there could be a website dedicated to the current status of plants that is updated by the generation facilities. Monitoring legislation and court activity is recommended as the outcomes of court proceedings will have an impact on deactivation. Communications with hyperscalers and other data centers should be conducted to know where they are purchasing land and have plans to build their plants.

3. Other assumptions about policy-driven retirements

a) Is there anything else that PJM should be considering on this topic?

Answer: The level of uncertainty facing the grid requires multiple modeling scenarios. These models should show if x, then y will happen and this advice should be shared with States as well as FERC and NERC for their respective planning purposes. Congress, Governors and State legislators are promulgating laws and they need information PJM can provide through these tests in order to make informed decisions.

Informed recommendations and explanations of probable consequences for proposed legislation would assist the executive and legislative branches of government in decision-making. While PJM should not conduct modeling and analysis on any proposed policy, for example legislation merely introduced at the state or federal level but should run models on final policies that have duly become law or actions for which appeals have been exhausted.

Artificial Intelligence is rapidly evolving, and an examination into the stability of its growing load would be appreciated.

Sincerely,

/s/ Elizabeth H. Barnes

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