



PJM Order No. 1920 Compliance

Response to PJM's Conceptual Approach

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On behalf of Americans for a Clean Energy Grid

May 19, 2025



Americans for a
Clean Energy Grid

Agenda

1. Purpose of Order No. 1920
2. Fundamental Questions
3. Scenario Development
4. Project Selection
5. Additional Comments



Purpose of Order No. 1920

- Plan proactively to address current and future needs, including generation retirements, changing resource mix, uncertainties in projected load increases
- Support an electric system that cost-effectively and affordably serve customers
- 1920 sets out a floor for improved planning not a ceiling
- Need durable long-term planning processes



Fundamental Questions

- PJM was created to provide benefits to states who wished to pool and jointly operate their resources; are the proposed planning processes building trust in meeting that end goal or are they creating divisiveness?
- Are the planning processes balancing future uncertainty with the need to plan on longer time horizons to ensure cost-effective build out of long-lived assets?
- Are the processes designed to provide stakeholders with meaningful information to understand if there are no-regrets solutions versus solutions that are only needed only if certain circumstances come to bear?
- Is the sponsorship model appropriate for longer term planning in PJM?



Scenario Development

- Appreciate that PJM integrated some stakeholder input from the previous LTRTP process
- Issues that needs further consideration/clarification:
 - Core and supplemental need analysis is confusing and creates unnecessary divisiveness
 - Age-based retirements is a transparent metric that should be incorporated into generation deactivation considerations
 - Need further detail re generation selection process



Project Selection

- Questions
 - How will projects that arise out of the competitive window be divided into the must-build and voluntary track?
 - What does PJM mean by portfolio planning?
 - Need more understanding around PJM's selection criteria re required in-service date and the lead-time of the LT Solution.
 - Does the process build trust that selections will provide the “biggest bang for the buck?”
 - Are there any steps being taken to support constructability after projects are selected?





Closing Comments