

Presentation to PJM TEAC Special Session

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About Advanced Energy United

Advanced Energy United educates, engages, and advocates nationally for policies that allow our member companies to compete to repower our economy with 100% clean energy. The businesses we represent are lowering consumer costs, creating millions of new jobs, and providing the full range of clean, efficient, and reliable energy and transportation solutions.



Order 1920 compliance will bring benefits to PJM

- Transmission costs have increased 117% in PJM in recent years, yet the region's transmission infrastructure still needs significant investment
- Long-term, scenario-based planning as directed by FERC Order 1920 is critical to reversing these trends and ensuring we are investing in the highest-value transmission to meet needs
- PJM proposal and methodology must be fully compliant with FERC Order 1920 to deliver benefits*



^{*}This presentation touches on two priority areas where PJM's proposal is clearly non-compliant. Lack of discussion of other issues should not be interpreted as an indication that United believes PJM's proposal is otherwise in compliance with FERC's Order.

Bifurcated Needs Identification is Inconsistent with Multi-value Planning

- Order 1920 requirement: Identification of LT needs and consideration of required economic and reliability benefits (P 720) to inform selection
- PJM proposal: Arbitrary distinction between "core" (reliability) and "additional" (economic) needs
- Impact: Bifurcated approach will result in inefficient, sub-optimal outcomes
- Recommendation: Embrace multi-value planning that considers both reliability and economic needs together



PJM Needs to Fully Address Advanced Transmission Technologies (ATTs)

- Order 1920 requirement: Requires evaluation of ATTs by transmission providers (P 1198) and selection/non-selection explanation (P 1214)
- **PJM proposal:** Defers to bidders the responsibility to demonstrate that they have considered ATTs in their proposals, and explain why ATTs were (not) selected
- Impact: Failure to identify more efficient and cost-effective solutions
- Recommendations:
 - PJM identifies needs where ATTs are most appropriate, and proposes ATT solutions if bidder(s) did not sufficiently integrate ATTs for relevant needs.
 - o PJM provides rationale for chosen solutions where ATTs were rejected.



Thank you.



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