

# Review of Stakeholder Feedback from May 19 Special TEAC and PJM's Considerations

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Special TEAC – Order 1920  
May 30, 2025

- Review stakeholder feedback from May 19, 2025
- PJM's considerations:
  - Core and Additional LT Needs
  - Other feedback

# Review of Stakeholder Feedback from 5/19 Special TEAC

- **RMI** (Claire Wayner)
- **Institute for Policy Integrity** (Christoph Graf)
- **Americans for Clean Energy Grid** (Anjali Patel)
- **Advanced Energy United** (Jon Gordon)
- **New Jersey PBU** (Amanda Lescano) and **Illinois Commerce Commission** (Hannah McCorry)
- **Clean Energy Buyers Association** (Bryn Baker)

- Stakeholders shared feedback regarding the distinction between Core and Additional LT Needs in PJM's compliance approach:
  - Approach could be difficult to understand
  - Process may be overly complex
  - Planning framework is not multi-value (focuses on reliability)
  - Approach may be non-compliant

- Compliance
  - Alternative Transmission Technologies
  - Discussion around the sponsorship model approach for LTRTP
- Implementation
  - Corporate commitments
  - Age-based deactivations
  - Co-expansion and resource adequacy modeling

# PJM's Considerations: Core and Additional LT Needs

## Core and Additional LT Needs: Overview of PJM's Considerations

- Clarifications on the current proposal – PJM's compliance approach is:
  - Multi-value (similar to MISO's)
  - Compliant with Order 1920
- PJM will further clarify its compliance approach by taking the following actions to address stakeholder feedback:
  - *PJM will start discussing compliance with specific aspects of Order 1920 at the June 16 special TEAC*
  - *PJM will draft a whitepaper on its compliance approach*
- ***Finally, PJM will continue to work with the PJM Area Relevant State Entity Committee (PARSEC) to improve the framework for Evaluation Process and Selection Criteria of Additional Needs***



- The Backstop plan is multi-value planning
  - In addition to keeping the lights on, the backstop plan:
    - Produces substantial economic value
    - Produces substantial policy value
- PARSEC and individual states can pursue other transmission upgrades with PJM beyond the Backstop plan
  - The Backstop plan is a backstop introduced by PJM beyond Order 1920 requirements to take *independent* action and keep the lights on if states do not want to pursue other transmission upgrades



# The Backstop Plan Will Produce Substantial Economic Value

- One of the tests PJM will use to identify Core LT Needs is the Generation Deliverability test
  - GD ensures there are no transmission issues associated with the delivery of energy from Capacity Resources to the rest of PJM when those resources are ramped up beyond their typical economic level and under contingency conditions
  - Thus, one should expect economic congestion to largely overlap with issues also identified through the GD test. **PJM categorizes these issues as Core LT Needs**

- **In the Workshop Policy Study  
90% of congestion was on facilities  
with reliability issues**

kV Level	Congestion (mil. \$)	Overlap with reliability (mil. \$)
230	2,282	2,022
345	792	724
500	471	464
Total	3,545	3,210

[Special TEAC – Order 1920, 10/12/2025](#), page 27

- Use Benefits (production cost savings) for selection of solutions that address Core LT Needs
  - **If there are two solutions for a Core LT Need, PJM will pick the solution that produces the greatest economic benefits (lower congestion/curtailments) all other things being equal**

## Core LT Needs: identified through reliability tests (e.g. generation deliverability) and associated with:

### Load Forecast

Examples:

- Electrification targets (heat-pumps and electric vehicle incentives)
- Distribute Energy Resource targets (e.g. BTM solar incentives)

### Modeled Deactivations

Examples:

- EPA Coal Combustion Residuals
- Illinois CEJA and New Jersey CO2 rule

**Generation up to 1-in-10 resource adequacy target criteria**, with consideration of policies affecting new generation, except resource-specific targets\*

Examples, *if needed to meet up to the 1-in-10 reliability criteria\*\**:

- Delaware 28% RPS target by 2030
- Maryland 14.5% RPS solar carve-out by 2030

\* Unless resources have GIA, WMPA or completed SAA. Currently these resource-specific targets correspond to “State Energy Storage Targets” and “State Offshore Wind Targets” tabs of the State Policies Workbook.

\*\* For the Workshop Policy Study, PJM performed the capacity expansion through 2039 using the 2024 Load Forecasts and policy-driven deactivation assumptions. The solar and onshore wind resources needed for resource adequacy were above the level needed to meet states’ RPS targets throughout the entire expansion horizon. Thus, in that study, all of the solar and onshore wind resources required for states’ RPS targets would have been associated with Core LT Needs. The 2025 Load Forecast is substantially higher than the 2024 Load Forecast.

- Order 1920 is designed only to “provide the opportunity for transmission providers to select” LTRT Facilities addressing LT Needs. (P1026)
- FERC declined to require the selection of any particular LTRT Facility “even where” it meets the selection criteria (P1026)
  - Order 1920 requires: (i) identification of LT Needs; and (ii) tariff-stated selection criteria for “potential selection”
  - Order 1920 provides flexibility in how to: (i) measure LTRT Facility benefits; (ii) “balance competing interests in the transmission planning region;” and (iii) “exercise engineering judgment”

- PJM is planning to exceed Order 1920's requirements:
  - Order 1920 stated that “nothing in this final rule prohibits transmission providers from proposing to impose upon themselves a requirement to select a [LTRT] Facility in certain circumstances.” (P1028)
  - PJM intends to do just that by independently selecting LTRT Facilities that address the Core LT Needs

# PJM's Considerations: Other Feedback

**Advanced Energy United's Proposal:** PJM identifies needs where ATTs are most appropriate, and proposes ATT solutions if bidder(s) did not sufficiently integrate ATTs for relevant needs.

- **PJM response:** PJM will not be proposing or forcing specific solutions nor technology specific uses, but will evaluate all submitted proposals. Proposing entities and project sponsors need to be willing and ready to adopt the proposed solution.

**Advanced Energy United's Proposal:** PJM provides rationale for chosen solutions where ATTs were rejected.

- **PJM response:** PJM selects projects based on merit and reviews selections with stakeholders through the TEAC (including selection rationale) prior to submission to the PJM Board of Managers for review and approval.



# PJM's Approach to ATT Requirements is Compliant

- PJM will “consider” all proposed ATT solutions to address LT Need posted in the competitive window
- Requiring developers to provide rationale in submissions whether each ATT would address the LT Need appropriately implements Order 1920 consistent with the sponsorship model
  - PJM will evaluate each submittal's compliance with the ATT consideration requirement



# PJM will Utilize the Sponsorship Model for LTRTP

- PJM's sponsorship model proved effective for Order 1000 implementation
  - Leads to more efficient or cost effective solutions by *leveraging the competition* between transmission developers rather than relying on PJM to design the best solutions
- PJM will continue to use the sponsorship model for LTRTP
  - Leverage consolidated practices to timely implement the new LTRTP process
  - PJM may propose adjustments to specific projects towards achieving a more efficient or cost effective solutions

- PJM will not preclude the consideration of aged-base retirements or corporate commitments for the Base Scenario in the compliance filing
  - Those assumptions will be discussed with stakeholders upon implementation
- Modeling
  - PJM is testing a resource adequacy approach that uses a multi-dimensional ELCC surface
  - PJM is working on co-expansion techniques but will not commit to those techniques until they are proven to work and discussed with stakeholders. Until then PJM will use copperplate expansion which is the industry best practice (e.g. MISO)

- PJM will start discussing compliance with specific aspects of Order 1920 at the June 16 special TEAC
- PJM to continue discussions with PARSEC on the LTRTP framework
- PJM to work on whitepaper outlining compliance approach

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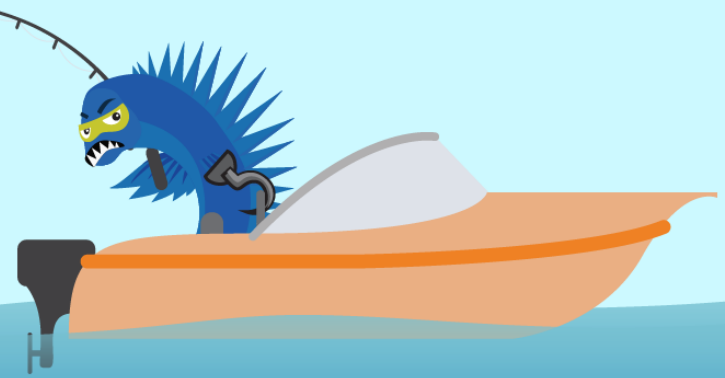
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