



PJM Order 1920 Compliance Updates

Presentation to PJM TEAC Special Session
(July 18, 2025)

Claire Wayner



PJM's Order 1920 compliance approach remains a strong step forward

- Commits to building projects to address Core LT Needs (row 40)
- Keeps the portfolio planning option on the table (row 31)
- Includes right-sizing opportunities (rows 35 & 73)
- Requires consideration of ATTs in submitted bids (row 53)

There are still several shortcomings with PJM's existing proposal

- Requiring states or Project Developers to sponsor Additional LT Needs through Voluntary Funding fails to maximize the benefits of long-term planning (rows 32, 38)
 - Defining some needs as Core and others as Additional remains unnecessarily complicated
 - An alternative approach that leverages benefits modeling to select projects based on net benefits would be stronger and most beneficial to all PJM states
- Relying on project sponsors to propose Alternative Transmission Technologies could result in under-adoption (row 53)
 - PJM could do independent modeling to identify where ATTs are most appropriate and compare these results to bids submitted

Additional clarity is needed

- What methodologies does PJM propose to utilize to model retirements as part of Factor Category Five? (row 18)
 - **Age-based modeling** will lead to the most “plausible” set of scenarios, as required by Order 1920 (row 7) and is also consistent with industry best practices in other regions (e.g., MISO LRTP)
- How does PJM plan to account for the resource adequacy value of Core *and* Additional generation resources?
 - PJM has stated that “resource-specific targets” will be classified as Additional. Does this apply to generation resources in IRPs?
 - Will Additional generation resources be excluded from resource adequacy considerations in the Core LT Needs & Backstop plan?



Thank you!

Claire Wayner
cwayner@rmi.org