



## Organization of PJM States, Inc. (OPSI)

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January 21, 2022

Dave Anders  
Director, Stakeholder Affairs, Market Service  
PJM Interconnection LLC  
2750 Monroe Boulevard  
Audubon, Pennsylvania 19408

Dear Mr. Anders

OPSI appreciates the efforts PJM is making in Phase 2 of its capacity reform process under Key Work Activity 1 to study clean procurement. OPSI has created the Competitive Policy Achievement Working Group to develop a proposal for a potential voluntary, market-based procurement option that enables states and willing buyers to access competitive energy resources in line with their policy goals.

Attached is a set of questions from the working group designed to develop information for consideration when making decisions on options for procuring energy for state policy goals.. Please send answers to the questions as they are completed and provide a timeframe for a complete response.

Sincerely,

*/s/ Gregory V. Carmean*

Gregory V. Carmean  
Executive Director  
Organization of PJM States, Inc.

## **Analysis Request for PJM:**

1. How much renewable / clean<sup>1</sup> capacity exists within PJM?
  - a. How much renewable / clean capacity cleared in the last BRA?
  - b. How much would have cleared if ELCC had been applied?
  - c. How much renewable/clean capacity was interconnected to PJM's system in 2021? What is a realistic estimate for how much will be interconnected in 2022? (UCAP and ICAP)
2. How much renewable / clean capacity is needed to meet State Policy Goals?
  - a. Is there any indication that the resources needed to meet these goals will materialize in PJM under the Status Quo Policy<sup>2</sup> Scenario?
  - b. Is there any indication that the resources needed to meet these goals will materialize in PJM under the Accelerated<sup>3</sup> Scenario?
  - c. How many of these resources can be processed through the interconnection queue?
  - d. How much of this capacity is anticipated to bid and clear in the BRA? Why or why not?
3. What are the cost impacts of incorporating State Policy Goals into the market?
  - a. Of growing State Policy procurements under the status quo?
  - b. Of growing State Policy procurements incorporated into regional markets?
4. What are the reliability implications?
  - a. Of growing State Policy procurements under the status quo?
  - b. Of growing State Policy procurements incorporated into regional markets?
5. How would each of the potential pathways<sup>4</sup> fit together with existing state policy?
  - a. For example, how would Renewable Energy Credits/Clean Energy Attribute Credits be created through an ICCM or FCEM? How would those Credits interface with existing state RPS requirements?
6. How would each of the potential pathways impact existing jurisdictional boundaries?
  - a. For example, what are the legal implications of use of PJM EIS for creation and retirement of RECs?

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<sup>1</sup> As defined in individual state policies within the OPSI member states.

<sup>2</sup> *Renewable Integration in PJM: Frameworks for Analysis* (Dec. 2021), at 6.

<sup>3</sup> *Id.*

<sup>4</sup> *Clean Procurement Road Map Key Work Activity 1*, PJM RASTF (Dec. 17, 2021), at 6.