

PJM Board of Managers
c/o Mark Takahashi, Chairman
c/o Manu Asthana, PJM President and CEO
c/o Donnie Bielak, Director, Interconnection
Planning
PJM Interconnection L.L.C.
2750 Monroe Boulevard
Audubon, Pennsylvania 19408

Federal Energy Regulatory Commission
c/o Willie L. Phillips, Chairman
c/o Terry Turpin, Director, Office of
Energy Projects
888 First Street, NE
Washington, DC 20426

RE: Expedited Interconnection Studies for High-capacity Factor Generation

Joint Statement in Opposition to PJM Proposal for Expedited Interconnection of Natural Gas Projects

We, the undersigned environmental and clean energy industry companies, organizations, and associations, write to oppose the proposal by the PJM Planning Commission to fast-track natural gas projects through the interconnection queue.

A proposal to fast-track natural gas, a resource recently assessed by PJM to be less reliable and for which there is no associated storage capacity in the event of outage, will not solve PJM's resource adequacy issues or meaningfully reduce capacity auction costs, particularly compared to the potential of lower-cost, dispatchable solar-plus-storage projects awaiting interconnection.

Fast-tracking any project through the queue risks introducing additional costs and increasing the rate of withdrawals for projects now pushed farther back into the interconnection queue. It is also worth noting that the highest reliability resources are hybridized, and there are zero hybridized natural gas projects in the interconnection queue in PJM. Currently, the only hybridized projects awaiting interconnection are clean energy resources such as solar plus storage.

The proposal to fast track gas is based on flawed conclusions from the recent capacity market auction. **Additional fossil gas resources do not support near-term resource adequacy concerns.** PJM's inflated 2025-2026 capacity market auction costs reflect resource adequacy issues associated with fossil fuels' inherent unreliability particularly during periods of extreme weather. This is true by PJM's own admission. For example, during winter storm Elliott, 40 Gigawatts of coal and natural gas were forced offline.¹ Because PJM has correctly determined that these fossil fuel resources are less reliable² during periods of inflated demand – such as winter cold snaps – than they had previously been deemed, their relative contribution to the capacity market shrank. This meant that there was less

¹ [PJM Interconnections \(2023\) "Winter Storm Elliott Event Analysis and Recommendation Report"](#)

² <https://www.capitaliq.spglobal.com/apisv3/spg-webplatform-core/news/article?id=82862106&redirected=1>

capacity bidding into the 2025-2026 capacity market than there had been during prior annual auctions, resulting in higher clearing costs and the inflated \$14.7 billion total auction results.

As of April 2024, there were 3065 active projects representing nearly 287 GWs of storage in the PJM queue. Over 90% of generation awaiting interconnection approval is solar, wind, storage, or hybridized.³ Because of PJM's failure to adequately plan for increasing transmission capacity and delays in implementing reform to the interconnection system, the vast majority of these valuable, often low-cost resources are still awaiting interconnection.

Storage is an essential resource during periods of peak demand. In PJM, 24% of solar projects' and 37% of storage projects' proposed capacity is hybridized,⁴ and would be able to contribute stored capacity during a winter storm Elliott-like period of increased demand. By contrast, 0% of gas proposals are hybridized.⁵ This means that in the likely event of extreme cold snaps resulting in gas plant failures, fast-tracked gas projects will not be able to contribute stored electricity to the grid.

Due to the low reliability value of gas power plants, increased extreme weather expected due to climate change, and public health and climate impacts of fossil fuels, we strongly oppose the current fast-tracking proposal.

Signed,

Advance Maryland
Appalachian Citizens' Law Center, Inc.
Beaverdam Creek Watershed Watch Group
CASA
Cedar Lane UU Environmental Justice Ministry
Center for Progressive Reform
Chesapeake Climate Action Network
Chesapeake Physicians for Social Responsibility
Clean Virginia
Climate Action Alliance of the Valley
Climate Communications Coalition
Colby Solar/Navitas Solar USA by Colby
EcoAction Arlington
Green Sanctuary of the Unitarian Universalist
Church of Silver Spring (MD)
Greenbelt Climate Action Network
Indivisible HoCoMD Environmental Action
Interfaith Power & Light (DC.MD.NoVa)
Maryland Energy Advocates Coalition

Maryland Legislative Coalition
Montgomery County Faith Alliance for Climate
Solutions (MC-FACS)
No Boundaries Coalition, Inc.
New Virginia Majority
PennFuture
RiSE for Environmental Justice
Sierra Club Virginia Chapter
South County Environmental Justice Coalition
Texas Environmental Justice Advocacy Services
The Climate Mobilization, Montgomery County MD
The Piedmont Environmental Council
Third Act Maryland
Unitarian Universalist Legislative Ministry of
Maryland
Virginia Conservation Network
Virginia Interfaith Power & Light
Virginia League of Conservation Voters

³ [Howard, E. \(2024, May 9\). Clean energy, gas generation in pjm may take longer to come online than expected: report. Utility Dive.](#)

⁴ [Rand, J. et al \(2024\) "Queued Up: 2024 Edition Characteristics of Power Plants Seeking Transmission Interconnection As of the End of 2023" Lawrence Berkeley National Laboratory](#)

⁵Ibid