

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

PJM Interconnection, L.L.C.)
)
Building for the Future Through)
Electric Regional Transmission)
Planning and Cost Allocation)

Docket No. ER26-751-000

ACORE COMMENTS

Pursuant to Rule 211 of the Federal Energy Regulatory Commission (“Commission”) Rules of Practice and Procedure,¹ ACORE submits these comments on the Order Nos. 1920, 1920-A, and 1920-B Compliance Filing of PJM Interconnection, L.L.C. (“PJM Compliance Filing”) submitted on December 12, 2025 in the above captioned docket.

ACORE is a nonpartisan nonprofit organization that operates at the intersection of affordability, reliability, and clean energy deployment. Our work is focused on stabilizing energy prices, strengthening the electric grid, and driving investment in cost-effective technologies to ensure that clean energy delivers for people, businesses, and the U.S. economy. ACORE’s membership includes clean energy investors, developers, energy buyers, power generators, manufacturers, and energy providers.

In line with ACORE’s mission, we urge the Commission to move forward expeditiously on approving PJM’s Compliance Filing and the implementation of its Long-Term Regional Transmission Planning (LTRTP) process. As PJM explains, “setting a future effective date with notice to the Commission and stakeholders is necessary because PJM and stakeholders will require time to develop the implementation details for the LTRTP Protocol as approved by the

¹ 18 C.F.R. § 385.211 (2024).

Commission.”² Therefore, the sooner the Commission approves this first compliance filing, the sooner the LTRTP process can be established and implemented.

PJM has demonstrated its intent to comply with a number of critical provisions of Order Nos. 1920, 1920-A, and 1920-B (“Transmission Planning Orders”), including the development of an LTRTP on a five-year planning cycle with a 20-year horizon and at least three different scenarios, the use of the seven different categories of transmission drivers, sensitivity analyses to account for extreme weather, consideration of alternative transmission technologies, and the use of selection criteria that include the measurement and quantification of at least the seven benefits required in the Transmission Planning Orders.

ACORE appreciates PJM’s engagement with the states via the PJM Area Relevant State Entities Committee (PARSEC). This engagement resulted in several unique components of the proposal, including the categorization of Core and Additional Long-Term needs and the use of different benefit-cost ratios for projects that address each category. ACORE does not object to this aspect of the proposal so long as PJM’s process results in LTRTP solutions to meet the Core needs that “also encompass economic and policy needs.”³ PJM’s incorporation of multiple drivers of transmission in the planning process will be essential to optimizing the benefits of transmission selected through the LTRTP.

As PJM explains, the planned filing of a state opt-out provision in June is also a result of this critical engagement with the states. ACORE will evaluate this proposal when it is filed, along with the important voluntary funding provision. However, PJM can still undertake the

² PJM Compliance Filing at 2.

³ *Id.* at 71.

stakeholder process of developing the LTRTP protocols prior to this June filing. That process must begin as soon as feasible for PJM to meet the myriad challenges facing the grid today.

The benefits of expanded transmission cannot be overstated. As the Commission correctly found in the initial Order 1920, “regional transmission planning that identifies more efficient or cost-effective transmission solutions to needs helps to ensure cost-effective transmission development for customers and can yield better returns for every dollar spent than localized or piecemeal transmission solutions.”⁴ More recently, Commissioner Chang stated in her concurrence on the Commission’s recent Order to PJM on the Show Cause Proceeding that the Order “does not address the broader reliability challenges impacting the PJM footprint and its customers,” and that “PJM must ensure that the transmission system is built to adequately support the interconnection of new, needed generation.”⁵

These challenges to PJM’s grid will increase over the foreseeable future. PJM recently forecast an annualized growth rate for the summer peak at an average of 3.6% per year over the next 10 years and 2.4% over the next 20 years, compared to a 10-year average annual growth rate of 0.3% per year estimated in the 2021 Long-Term Load Forecast.⁶ Further, the winter peak load is projected to rise at an even greater rate than summer peak, an average 4.0% per year over the next 10-year period, and 2.7% over the next 20 years.⁷

⁴ *Bldg. for the Future Through Elec. Reg’l Transmission Planning & Cost Allocation*, Order No. 1920, 187 FERC ¶ 61,068 (2024) at P 100.

⁵ *Order on Show Cause Proceeding, Directing Compliance Filings, Establishing Paper Hearing, and Granting in Part and Denying in Part Complaint*, 193 FERC ¶ 61,217 (2025), Commissioner Chang Concurrence at P 12.

⁶ *PJM’s Updated 20-Year Forecast Continues to See Significant Long-Term Load Growth*, PJM Inside Lines (January 14, 2026), <https://insidelines.pjm.com/pjms-updated-20-year-forecast-continues-to-see-significant-long-term-load-growth/>

⁷ *Id.*

Achieving the expansion and modernization of the grid to deliver affordable power to supply this accelerating demand necessitates that the Commission take the steps needed to expedite the establishment of PJM's LTRTP as required under the Transmission Planning Orders.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this pleading has been served this day upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 21st day of January, 2026.

/s/ Elise Caplan
Elise Caplan