UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C.) Docket No. ER26-1563

ACORE PROTEST OF PJM INTERCONNECTION LLC PROPOSED EXPEDITED INTERCONNECTION TRACK

Pursuant to Rule 211 of the Federal Energy Regulatory Commission ("Commission") Rules of Practice and Procedure,[1] ACORE submits this protest of the PJM Interconnection, LLC ("PJM") proposed revisions to its Open Access Transmission Tariff to establish an Expedited Interconnection Track ("EIT") process ("PJM EIT Proposal") filed on February 27, 2026, 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.

The proposed establishment of a process, such as the EIT, to expedite certain projects in the interconnection queue must be scrutinized to ensure the process is not discriminatory, provides certainty for investors and developers, and addresses a clear reliability challenge in an efficient manner that minimizes costs to consumers. While there are some positive aspects of the PJM EIT Proposal, it is highly uncertain that the EIT will produce the needed resources to meet

[1] 18 C.F.R. § 385.211 (2024).

the load growth challenge facing PJM. ACORE therefore asks that the Commission reject the PJM EIT Proposal and establish a process for more fundamental reforms, as described herein.

ACORE does support several of the proposed requirements for projects to enter the EIT, especially the commitment from the state Primary Siting Authority and the critical path construction schedule showing that the project will achieve commercial operation within 36 months. Such provisions help ensure that projects most likely to be completed in the near term will be included in this track. But other key features detract from the EIT's ability to achieve its goals.

Lack of Justification for UCAP Threshold

PJM has not sufficiently justified the 250 MW Unforced Capacity (UCAP) threshold for participation in the EIT or explained how it is relevant to meeting any specific reliability need. While technically "fuel neutral," PJM acknowledges that "some renewable technologies are not likely to reach 250 MW UCAP," and states that "at least four battery storage projects that meet the UCAP threshold at the 4-hour class and 11 battery storage projects that meet the UCAP threshold at the 10-hour class active in its interconnection process at present."[2]

It is not clear from this statement whether *any* wind and solar projects can meet this threshold, or how many storage or hybrid projects would *not* be eligible solely due to the UCAP requirement. Excluding such projects is discriminatory and prevents multiple shovel-ready

[2] PJM EIT Filing at 19.

resources from participating in the EIT, even though wind, solar, and storage can all be constructed within two years, while natural gas has a four- to five-year timeline.[3]

Given the EIT's stated focus on projects achieving commercialization within three years, this unnecessary restriction on the projects most likely to be constructed in that timeframe is counterproductive. ACORE therefore requests that, should the Commission approve the EIT, it should require PJM to clarify that such projects can be aggregated into a single EIT application.

Potential Impacts on Current Interconnection Queue and Other Processes

While PJM proposes a parallel track for EIT projects, it is not clear how this will impact overall staff and resource availability to process the projects currently in the interconnection queue. Moreover, in the Secretary of Energy's October 2025 directive to the Commission to initiate a rulemaking on the interconnection of large loads, one of the criteria is that "the interconnection study of large loads that agree to be curtailable and hybrid facilities that agree to be curtailable and dispatchable should be expedited."[4] Depending on the Commission's final rulemaking in that docket, it is possible that another expedited interconnection process could be

[3] *See* Solar Energy Industries Association, *We Need Solar and Storage to Address the Energy Emergency* (February 2025) showing average development timelines of 1.44 years for solar, 1.69 for batteries, and 1.75 for onshore wind compared to four years for natural gas combined cycle, available at: https://seia.org/blog/we-need-solar-and-storage-to-address-the-energy-emergency/; and Sam Newell, Wonjun Chang, and Paige Vincent, The Brattle Group, *A Wide Array of Resources is Needed to Meet Growing U.S. Energy Demand,* prepared for ConservAmerica (February 2025), at Slide 6 noting that Renewables and Storage are "ready now and relatively fast to deploy," compared to deployment timelines for nuclear restarts between 2027 and 2030, and unplanned natural gas beyond 2030, available at https://www.brattle.com/wp-content/uploads/2025/02/A-Wide-Array-of-Resources-is-Needed-to-Meet-Growing-US-Energy-Demand.pdf.

[4] US Department of Energy, *Secretary of Energy's Direction that the Federal Energy Regulatory Commission Initiate Rulemaking Procedures and Proposal Regarding the Interconnection of Large Loads Pursuant to the Secretary's Authority Under Section 403 of the Department of Energy Organization Act* (Oct. 23, 2025) at P 24, available at: https://www.energy.gov/sites/default/files/2025-10/403%20Large%20Loads%20Letter.pdf.

required, and PJM has not addressed how the EIT will work in tandem with, or whether it will be duplicative of, such an additional layer of prioritization.

Need for Fundamental Holistic Reforms

In a report prepared for ACORE last fall, Grid Strategies LLC concluded that the optimal approach to address ongoing interconnection queue constraints would be a two-part strategy of a "codified tool of last resort" to provide a "transparent, narrowly applied pathway for projects to address a verified, near-term reliability need," along with a fundamental reform of the interconnection process to be "proactively integrated with long-term transmission planning" which "shifts the queue from a reactive process that simply accepts its limits to an active driver of grid expansion."[5] Further, Grid Strategies recommends that to "provide developers with upfront cost certainty, a pooled, ex-ante zonal fee should be implemented. The contribution level should be published ahead of the window, should fund a portfolio of pre-identified upgrades, and should be credited through tariffed mechanisms, fostering proactive investment."[6]

In contrast to this strategy, the EIT represents another short-term measure that does not implement fundamental reforms that would empower PJM to address the ongoing challenges facing projects in the interconnection queue. As a result, developers continue to face high and unexpected network upgrade costs. While fifty-one projects were initially approved for PJM's Reliability Resource Initiative ("RRI),[7] almost a third of the capacity in that group has exited

[5] Houtan Moaveni, Lauren Campbell, Richard Seide, and Rob Gramlich, Grid Strategies LLC, *Interconnection Queue Rationing Reforms*, prepared for ACORE (Nov. 2025) at 37-39, available at: https://acore.org/resources/interconnection-queue-rationing-reforms/.

[6] *Id*. at 38-39.

[7] Donnie Bielak, *Reliability Resource Initiative Results Summary*, PJM Interconnection LLC Planning Committee (May 6, 2025) at Slide 6, available at: https://www.pjm.com/-/media/DotCom/committees-

after receiving their interconnection cost estimate.[8] The RRI portfolio had an estimated $3 billion in upgrade costs, with nine of the projects facing costs of around $90 million or more each, with some as high as $1.3 billion.[9] With EIT entities responsible for 100% of the upgrade costs, this concern could adversely impact these projects.

The limitations of a prioritization process without the necessary transmission expansion were demonstrated in a presentation by John Moura of the North American Electric Reliability Corporation ("NERC") on its most recent Long-Term Reliability Assessment to the Commission at the February 19, 2026, meeting. Mr. Moura clarified that if NERC had modeled MISO's Expedited Resource Addition Study ("ERAS") resources in the assessment, they "don't know whether or not the MISO area would have been red," explaining that "we haven't run those new projects through an energy model and a deliverability model."[10] Further, Mr. Moura stated that: "About 7 gigawatts of those ERAS resources are located in the MISO south area. There's some pretty big constraints between the MISO south and MISO north area and so to actually get those resources up there's some deliverability challenges. There's some transmission constraints."[11]

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groups/committees/pc/2025/20250506/20250506-item-06---reliability-resource-initiative---summary-results.pdf

[8] *See* Tom Rutigliano, *PJM's Reliability Backstop Auction: Fixing Half the Problem*, RTO Insider (Feb. 19, 2026), available at: https://www.rtoinsider.com/126112-pjm-reliability-backstop-auction-fixing-half-the-problem/; Jason Connell, *Successful Interconnection Reforms, Other PJM Initiatives Seek To Maximize Electricity Supplies*, PJM Inside Lines (March 16, 2026), available at: https://insidelines.pjm.com/connected/, stating that the RRI " has resulted in 41 projects representing approximately 8,000 MW of generation whose studies will be completed at the end of 2026."

[9] Moaveni et al., Grid Strategies LLC at 25.

[10] Transcript, Federal Energy Regulatory Commission, 1133rd Commission Meeting, February 19, 2026, at 65, available at: https://www.ferc.gov/media/transcript-february-19-2026-open-meeting

[11] *Ibid.*

ACORE therefore recommends that the Commission, rather than approving another piecemeal approach, undertake further proceedings on more fundamental interconnection reforms. Within this proceeding, regardless of whether it approves the PJM EIT Proposal, the Commission should request a report from PJM on how it will implement reforms to fundamentally improve the speed and efficiency of its interconnection queue process, including adopting innovative interconnection automation study tools and other advanced computing technologies that have been shown to improve study throughput and accuracy in other regional transmission organizations; expanding the deployment of high-performance conductors, grid-enhancing technologies and other advanced transmission technologies that can quickly increase grid capacity in advance of the development of major new transmission lines; and integrating generation interconnection queues with long-term transmission planning, comparable to the recently approved Southwest Power Pool's Consolidated Planning Process.

Respectfully submitted,

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March 20, 2026

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 20th day of March, 2026.

/s/ Elise Caplan
Elise Caplan