

Congress of the United States
Washington, DC 20515

October 15, 2025

Mr. Manu Asthana
President and CEO
PJM Interconnection
PO Box 1525
Southeastern, PA 19399-1525

Dear Mr. Asthana:

As members of Congress serving constituents within the PJM Interconnection service territory, we have a significant interest in ensuring that PJM is providing affordable electricity to its customers. There have been stark increases in electricity rates for our constituents. Some of our districts are facing electricity rate increases above 20 percent, and these unacceptably higher bills are coming when many households are already struggling to keep up with a higher cost of living. These rate increases are unaffordable and necessitate that PJM respond effectively to pursue reforms to the interconnection process that would address and prevent current and future rate hikes.

In the face of rising electricity demand, including from data centers, electrification, and increased manufacturing, it is paramount that PJM work to connect and approve new power generation projects expeditiously. Despite the predictable rise in demand, Lawrence Berkeley National Laboratory found PJM's interconnection queue to be amongst the most backlogged in the country, even after PJM froze the queue from accepting new applicants for several years.ⁱ The average project in the queue is waiting several years for an interconnection agreement.ⁱⁱ Additionally, when projects do get through the backlogged queue, they are assessed with sky-high network upgrade costs.ⁱⁱⁱ Because PJM has neglected to proactively support planning or building sufficient new transmission lines, each project in the queue is paying high costs for new transmission lines.

Given that more rapid interconnection could have saved our constituents from these price shocks,^{iv} we feel it imperative to urge PJM to address the interconnection issue with urgency, beyond the initial reforms already undertaken. In July, the Federal Energy Regulatory Commission (FERC) rejected parts of PJM's compliance filing for Order No. 2023, Improvements to Generator Interconnection Procedures and Agreements.^v In particular, FERC found PJM's filing inadequate regarding: charging assumptions and high grid upgrade costs for battery storage projects and consideration of Alternative Transmission Technologies (ATTs). We agree with FERC's finding and the need to address these compliance gaps as past reforms and practices are insufficient and request that PJM fully address each of these shortfalls in its refile, due October 22 of this year.

It's concerning that when battery storage projects are a low-cost technology and quick way to add capacity to the existing grid, PJM insists on relying upon outdated and conservative charging assumptions to unfairly make battery projects uneconomic, contributing to the low penetration of this key technology compared to other regions that have deployed nearly 50 times more capacity and where batteries are helping maintain reliability. In its order, FERC found that PJM's Order 2023 compliance proposal on operating assumptions for energy storage resources represented "an impermissible collateral attack on the final rule." In this era of rising prices, PJM must cease its attacks on FERC's final rule, acknowledge its requirements, and ensure that its updated compliance proposal later this month fully accounts for FERC's orders on energy storage assumptions.

PJM must also consider all enumerated ATTs for all projects and report transparently on their evaluation. ATTs can provide substantial benefits due to their quicker deployment and lower costs compared to traditional network upgrades. Failure to consider them leads to projects paying unnecessarily high grid upgrade costs, projects dropping out of the queue, and customers paying unjust and unreasonable rates. This failure has contributed to the capacity auction shortfalls and higher prices we are seeing today. While we appreciate that PJM's newly-developed Technical Reference Guide pushes the consideration of ATT's, a requirement for them to be considered must be codified within PJM's tariff.

We fully expect PJM to comply with FERC's direction on these topics, and urge PJM to make haste in achieving the 1-2 year interconnection study timelines it promises in its compliance filing. Our constituents and their pocketbooks are counting on it.

Beyond FERC Order No. 2023, we urge PJM to pursue deeper interconnection reforms to bring much-needed capacity online quickly and to achieve these interconnection study timelines. Other grid operators have seen great results come from so-called "connect and manage" techniques, and PJM should work to make its energy-only interconnection pathway, the Energy Resource Interconnection Service, easier to use and faster than alternatives. The reality is that the grid – and our constituents – need power as soon as possible, and PJM should be pursuing every available opportunity to hook clean power up to the grid.

While PJM's announced partnership with Tapestry to consider study automation was a step in the right direction, PJM lags behind other regions in pursuing these vital software solutions. We are concerned that automation efforts won't deliver faster study timelines for years to come, and we ask you to accelerate these efforts and implement automation solutions within the next year.

We are further concerned by your efforts to prioritize some resource types over others, namely natural gas plants. After promising that the Reliability Resource Initiative (RRI) was a "one-time" queue jumping mechanism, PJM proposed a new "Expedited Interconnection Track"

within the large load Critical Issue Fast Path.^{vi} This new track would once again come before the first cycle of its regular queue is opened. This contradicts testimony that Mr. Asim Haque, PJM's Senior Vice President for Governmental and Member Services, gave at an Energy and Commerce Committee hearing in March of this year, when he confirmed that the RRI intervention was a one-time solution, and that PJM was working to create an interconnection process that did not need manual interventions. Any proposal to again authorize queue interventions would be in immediate legal jeopardy and would waste time that PJM and our constituents do not have.

We fear that a focus on new queue-jumping fast tracks for certain resource types or projects serving certain customers betrays a lack of seriousness in fixing the regular-order queue. We urge PJM to focus instead on speeding interconnection studies for the hundreds of projects, primarily low-cost clean energy and storage, that have been lingering in PJM's queue for years—and to open the queue to new applicants as soon as possible.

If PJM is serious about fixing the cost crisis it has had a role in shaping — the organization must take responsibility for the parts of the project development process it does control and fully address each of the above matters in its revised Order No. 2023 compliance filing while making deeper reforms to speed interconnection. Anything else would be a dereliction of PJM's duty to provide electricity to our constituents at just and reasonable rates.

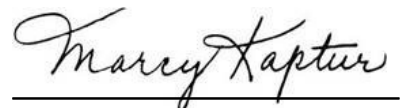
Sincerely,



Donald S. Beyer Jr.
Member of Congress



Sean Casten
Member of Congress



Marcy Kaptur
Member of Congress



Eugene Simon Vindman
Member of Congress



Sarah McBride
Member of Congress



James R. Walkinshaw
Member of Congress



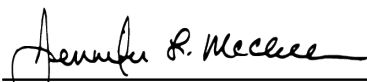
Jan Schakowsky
Member of Congress



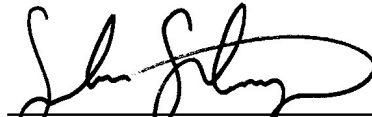
Donald Norcross
Member of Congress



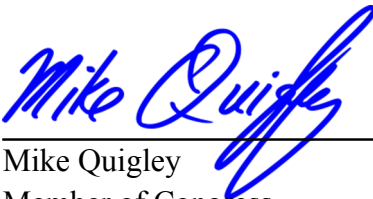
Bill Foster
Member of Congress



Jennifer L. McClellan
Member of Congress



Suhas Subramanyam
Member of Congress



Mike Quigley
Member of Congress



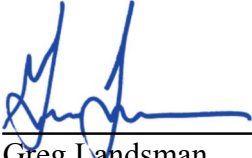
Summer L. Lee
Member of Congress



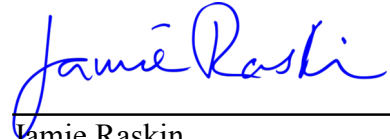
Eleanor Holmes Norton
Member of Congress



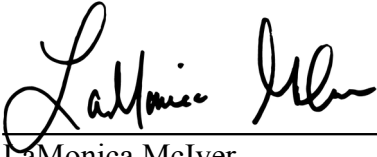
Bonnie Watson Coleman
Member of Congress



Greg Landsman
Member of Congress



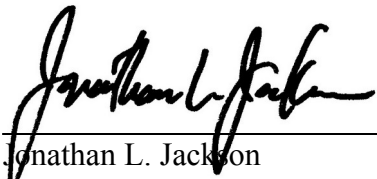
Jamie Raskin
Member of Congress



LaMonica McIver
Member of Congress



Robert J. Menendez
Member of Congress



Jonathan L. Jackson
Member of Congress



Emilia Strong Sykes
Member of Congress

- ⁱ Rand, Joseph, Nick Manderlink, Will Gorman, Ryan Wiser, Joachim Seel, Julie Mulvaney Kemp, Seongeun Jeong, and Fritz Kahrl. *Queued Up: 2024 Edition: Characteristics of Power Plants Seeking Transmission Interconnection as of the End of 2023*. Berkeley, CA: Lawrence Berkeley National Laboratory, April 2024.
- ⁱⁱ Advanced Energy United. *2024 Generator Interconnection Scorecard*. Washington, DC: Advanced Energy United, 2024. [https://advancedenergyunited.org/hubfs/2024%20Advanced%20Energy%20United%20Generator%20Interconnection%20Scorecard%20\(1\).pdf](https://advancedenergyunited.org/hubfs/2024%20Advanced%20Energy%20United%20Generator%20Interconnection%20Scorecard%20(1).pdf).
- ⁱⁱⁱ Lawrence Berkeley National Laboratory. 2023. "PJM Data Show Substantial Increases in Interconnection Costs." January 19, 2023. <https://emp.lbl.gov/news/pjm-data-show-substantial-increases>; Union of Concerned Scientists. 2025. *PJM Data Center Issue Brief — September 2025*. Washington, DC: Union of Concerned Scientists. <https://www.ucs.org/sites/default/files/2025-09/PJM%20Data%20Center%20Issue%20Brief%20-%20Sep%202025.pdf>.
- ^{iv} Meyer, Sophie, and Rob Gramlich. *Penny-Wise and Pound Foolish: PJM's Capacity Auction Demonstrates the Cost Imperative of Simplified and Speedy Interconnection*. Prepared for Advanced Energy United. Washington, DC: Advanced Energy United, February 2025. <https://gridstrategiesllc.com/wp-content/uploads/Penny-wise-and-pound-foolish-PJM-capacity-auction-and-interconnection.pdf>.
- ^v Federal Energy Regulatory Commission. 2025. "E-2-ER24-2045-000." *Federal Energy Regulatory Commission*, July 24. <https://www.ferc.gov/media/e-2-er24-2045-000>.
- ^{vi} PJM Inside Lines. "PJM Board Fast-Tracks Effort To Reliably Serve Large Loads." *PJM Inside Lines*, August 12, 2025. <https://insidelines.pjm.com/pjm-board-fast-tracks-effort-to-reliably-serve-large-loads/>.