



National Caucus of  
Environmental Legislators

September 29, 2025

Manu Asthana  
President and CEO  
PJM Interconnection, L.L.C.  
2750 Monroe Boulevard  
Audubon, PA 19403

Re: Supporting Resource Adequacy and Affordability in the PJM Region

Dear Mr. Asthana,

As legislators from states in PJM's service territory, we are writing to urge PJM to use all tools available to accelerate the deployment of renewable energy ahead of the phase-out of federal tax incentives.

Our region faces a capacity and affordability crisis as demand continues to rise and new [generation is slow to come online](#). It is essential that PJM removes barriers that encumber wind and solar energy — [currently the fastest and cheapest energy sources to deploy](#) — and do so in a timeline that enables more projects to qualify for federal tax incentives before they expire. PJM's Transition Cycle 1 currently has over 20 GW of clean energy and battery storage and will potentially sign interconnection agreements by November 2025. There are over 39 GW that have made it through the interconnection queue and are in various phases of procurement and construction. We request that PJM work with states by sharing information and collaborating through all possible avenues to get new capacity online. Specifically, we urge PJM to immediately pursue the following:

- **Work with federal agencies and the White House to implement an all-of-the-above energy strategy that includes renewable sources.** Given the capacity shortfalls that [PJM itself has recognized](#), it is imperative that PJM communicates the harm of federal restrictions on the deployment of renewable energies for the region's effort to address capacity shortfalls and increase reliability. Recent actions, including adding [additional agency reviews](#) and [cumbersome siting restrictions](#), complicating and [restricting access to tax incentives](#), and [freezing funding](#) for key infrastructure developments — are only compounding barriers for energy developers. [PJM has stated](#) that its "focus [is] on maintaining reliability now and in the future." To continue pursuing this goal, PJM must use as much of its influence to advocate for renewables as it would any other source of generation.
- **Adjust and re-file the CIR Transfer Efficiency Proposal with FERC by October 2025.** We appreciate PJM's previous efforts to expedite new generator interconnection through this proposal. We request that PJM incorporate the feedback received from FERC to remove construction timeline extensions and re-file the CIR Transfer within the next month, so as to ensure seamless, same-day generator replacement for the 3.7 GW of fossil resources that could be replaced by renewables and battery storage by 2027. This is especially crucial as many of these resources are looking to be retired and will significantly drive up consumer costs if kept online past their lifespan, while providing diminishing reliability returns.
- **Fully Comply With FERC Order 2023 and Immediately Implement Reforms To Increase Queue Processing Speed.** [FERC Order 2023](#) directs transmission providers to eliminate the reasonable efforts standard for conducting interconnection studies and to

implement a study delay penalty regime to hold transmission providers responsible for meeting study deadlines. PJM should immediately implement these reforms to its current queue cycle. By doing so, PJM will help reduce timelines and costs for renewable projects. As additional steps, we urge PJM to add staffing capacity and investigate shortening the number of processing days in its cluster study timeline. Please also share with us an update on the work Tapestry has undertaken to address these issues with PJM.

- Create Rules To Allow "Provisional" Interconnection Service That Will Allow Resources To Start Construction As Soon As Possible.** PJM is already considering new rules to allow resources to provide "energy only" interconnection service while their transmission upgrades are being constructed. We urge PJM to apply these rules to the current queue cycle, so that renewable projects in the queue can move more quickly towards construction and increase their likelihood of obtaining the federal tax credits.
- Work With State Agencies and Mutually Share Information About Barriers To Post-Queue Projects Achieving Commercial Operation, Including Building Timely Network Upgrades.** While states may have visibility into costs and permitting delays, PJM has particular insight into overall timelines and material delays. Sharing information will help states and PJM identify solutions that will be crucial as we continue to face rising demand. We also recommend PJM and the transmission owners consider implementing improved reporting and monitoring on progress towards constructing new network upgrades to better understand the causes of the transmission construction backlog, since transmission owner delays are responsible for a quarter of overall project delays in PJM.

As state legislators, we have an obligation to keep our constituents' lights on and their electricity bills affordable. By limiting renewables, both of these aims are jeopardized. We urge PJM to work with the states, federal agencies, and internally to ensure all energy resources are able to deploy quickly, cheaply, and ahead of federal tax incentive expirations.

Thank you for your attention and consideration.

Signed,

MD Del. Lorig Charkoudian (MD-20)

DE Rep. Frank Burns (DE-021)

DE Sen. Stephanie Hansen (DE-010)

IL Sen. Cristina Castro (D-IL-022)

IL Rep. Joyce Mason (IL-061)

IL Rep. Anna Moeller (IL-043)

IL Rep. Maura Hirschauer (D-IL-049)

IL Rep. Michelle Mussman (IL-056)

IL Sen. Rachel Ventura (IL-043)

IN Rep. Carolyn Jackson (IN-001)

IN Rep. Matt Pierce (IN-061)

MD Del. Malcolm Ruff (MD-041)

MD Del. Sheila Ruth (MD-044B)

MD Del. Matthew Schindler (MD-002B)

MD Del. Gary Simmons (MD-012B)

MD Del. Stephanie Smith (MD-045)

MD Sen. William "Will" Smith (MD-020)

MD Del. Jared Solomon (MD-018)

MD Del. Ryan Spiegel (MD-017)

MD Del. Dana Stein (MD-011B)

MD Del. Vaughn Stewart (MD-019)

MD Del. Nick Allen (MD-008)  
MD Del. Marlon Amprey (MD-040)  
MD Sen. Dalya Attar (MD-041)  
MD Del. Heather Bagnall (MD-033C)  
MD Del. J. Sandy "Sandy" Bartlett (MD-032)  
MD Del. Dylan Behler (MD-030A)  
MD Sen. Pamela "Pam" Beidle (MD-032)  
MD Del. Adrian Boafo (MD-023)  
MD Del. Regina Boyce (MD-043A)  
MD Sen. Benjamin Brooks (MD-010)  
MD Del. Mark Chang (MD-032)  
MD Del. Brian Crosby (MD-029B)  
MD Del. Charlotte Crutchfield (MD-019)  
MD Del. Bonnie Cullison (MD-019)  
MD Del. Mark Edelson (MD-046)  
MD Del. Elizabeth Embry (MD-043A)  
MD Del. Kris Fair (MD-003)  
MD Sen. Brian Feldman (MD-015)  
MD Del. Jessica Feldmark (MD-012A)  
MD Del. Linda Foley (MD-015)  
MD Del. Catherine "Cathi" Forbes (MD-043B)  
MD Del. Michele Guyton (MD-042B)  
MD Del. Anne Healey (MD-022)  
MD Sen. Katie Hester (MD-009)  
MD Sen. Shelly Hettleman (MD-011)  
MD Del. Terri Hill (MD-012A)  
MD Sen. Carl Jackson (MD-008)  
MD Del. Andre Johnson (MD-034A)  
MD Del. Anne Kaiser (MD-014)  
MD Del. Marc Korman (MD-016)  
MD Sen. Benjamin "Ben" Kramer (MD-019)  
MD Sen. Clarence Lam (MD-012)  
MD Del. Mary Lehman (MD-021)  
MD Sen. Charles Sydnor (MD-044)  
MD Del. Deni Taveras (MD-047B)  
MD Del. Kym Taylor (MD-023)  
MD Del. Jen Terrasa (MD-013)  
MD Del. Kriselda "Kris" Valderrama (MD-026)  
MD Del. Joseph "Joe" Vogel (MD-017)  
MD Sen. Jeff Waldstreicher (MD-018)  
MD Del. Courtney Watson (MD-009B)  
MD Sen. Ron Watson (MD-023)  
MD Del. Melissa Wells (MD-040)  
MD Del. Jennifer White Holland (MD-010)  
MD Del. Jheanelle Wilkins (MD-020)  
MD Del. Nicole Williams (MD-022)  
MD Del. Greg Wims (MD-039)  
MD Del. Sarah Wolek (MD-016)  
MD Del. Jamila Woods (MD-026)  
MD Del. Teresa Woorman (MD-016)  
MD Del. Chao Wu (MD-009A)  
MD Del. Natalie Ziegler (MD-009A)  
MI Rep. Laurie Pohutsky (MI-017)  
NC Rep. Julie Von Haefen (NC-036)  
NC Rep. Pricey Harrison (NC-061)  
OH Rep. Tristan Rader (OH-013)  
OH Sen. Kent Smith (OH-021)  
PA Rep. Lisa Borowski (PA-168)  
PA Rep. Elizabeth Fiedler (PA-184)  
PA Rep. Paul Friel (PA-026)  
PA Rep. Joseph "Joe" Hohenstein (PA-177)  
PA Rep. Jeanne McNeill (PA-133)  
PA Rep. Jennifer "Jenn" O'Mara (PA-165)  
PA Rep. Danielle Otten (PA-155)  
PA Rep. Chris Pielli (PA-156)  
PA Rep. Benjamin "Ben" Sanchez (PA-153)

MD Del. Jazz Lewis (MD-024)	PA Rep. Christina "Chris" Sappey (PA-158)
MD Sen. Karen Lewis Young (MD-003)	PA Rep. Greg Vitali (PA-166)
MD Del. Lesley Lopez (MD-039)	PA Rep. Ben Waxman (PA-182)
MD Del. Bernice Mireku-North (MD-014)	VA Sen. R. Creigh Deeds (VA-011)
MD Del. David Moon (MD-020)	VA Del. Phillip "Phil" Hernandez (VA-094)
MD Del. Julie Palakovich Carr (MD-017)	VA Sen. Saddam Salim (VA-037)
MD Del. Joseline Pena-Melnyk (MD-021)	VA Del. Shelly Simonds (VA-070)
MD Del. Lily Qi (MD-015)	VA Del. Richard "Rip" Sullivan (VA-006)
MD Del. Mike Rogers (MD-032)	VA Sen. Schuyler VanValkenburg (VA-016)
MD Sen. Jim Rosapepe (MD-021)	WV Del. Evan Hansen (WV-079)