



# PJM Interconnection Policy Workshop: ACP Considerations on ANOPR

November 2, 2021

# Overview of ACP Comments

- Urge FERC to consider a two-stage rulemaking process:
  - First stage – Interconnection Reform Rulemaking
    - End participant funding
    - Reform crediting policy
    - Implement cost caps
    - Coordinate affected systems studies
    - Model storage based on use
  - Second stage – Transmission Planning and Cost Allocation Reform
    - Proactive and portfolio planning
    - Interregional joint planning
    - Focus on what's worked historically
    - Consider storage
    - Layered cost allocation
- [Available here.](#)

# Key Considerations on PJM's Comments

- Agree with most key PJM principles – decarbonization, resilience, equity between regions
- View participant funding differently
- Acknowledge relationship between cost allocation and coordination of different drivers under PJM's current RTEP
- View cost causation precedent differently

# Response to PJM Proposed Reforms

- Support continued development of grid-forming inverters
- Broadening ELCC should include all resources
  - Not just “variable and limited duration resources”
- Incorporation of resilience benefits and needs, including black start
- Longer-term enhanced planning
- Interregional transfer capability metric is of interest