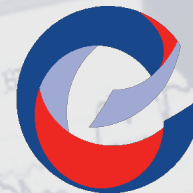


Co-located Load Proposal Comments

PJM MIC
June 7, 2023



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AEMA Mission

Advanced Energy Management Alliance (AEMA) advocates for policies that empower and compensate customers appropriately--to contribute energy or energy-related services or to manage their energy usage--in a manner which contributes to a more efficient, cost-effective, resilient, reliable, and environmentally sustainable grid.

Our members are providers and supporters of distributed energy resources (DERs), including demand response (DR) and advanced energy management, united to overcome barriers to nationwide use of demand-side resources.

AEMA Members

Aypa Power

Centrica Business Solutions

Convergent

Demand Power

ELCON

Electric Advisors Consulting

Enel X

EnergyHub

Google

Great Circle Solar

Icetek

Innoventive Power

Itron

Modern Energy

NRG

Ormat

Resideo

Rodan Energy Solutions

Voltus

Vote Solar

Walmart

Workbench Energy

Disclaimer - This proposal is not necessarily supported by the entire AEMA membership

AEMA Proposal

The AEMA Proposal is the only proposal that always treats interconnections with co-located load as wholesale transmission interconnections delivering wholesale energy for resale.

All other proposals can result in co-located load treatment as wholesale transmission load *on the basis of state assertion of retail jurisdiction* - in contradiction with the FPA.

Issues with other proposals – and the “status quo”

Exempting Co-located load from transmission service will result in increased costs to remaining transmission customers due to:

- Increased need for generation to serve existing load due to diversion of energy to co-located load.
- Increases in already rapidly rising transmission costs to deliver the new generation to existing load. This is transmission cost that co-located load causes but does not pay for.



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Questions?



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