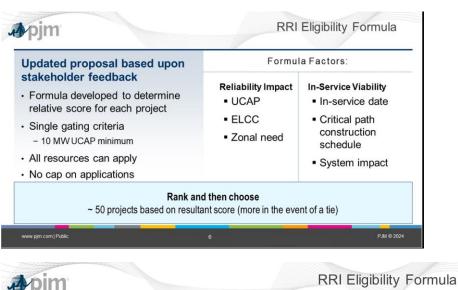
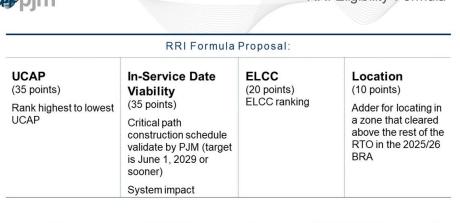
The below was presented at the Nov 21,2024 MC mtg – as PJM's Resource Reliability Initiative (RRI) proposal, per that information some consumer advocates propose some adjustments to consider on the following page.





Some consumer advocates remain concerned that 50 projects are an arbitrary number that may not meet the reliability need. Instead, we propose that the RRI be pursued based on the estimated GW shortfall. The average of PJM's "no entry" (-28GW) and "40% entry" (-10GW) shortfall analysis would make the need 19GW. We propose that 19GW would be a better goal metric than 50 projects.

• In addition, the goal of the RRI should be to get resources online by a date certain. This means that PJM's previously proposed in-service date of June 1, 2029, with required offering into the subsequent BRAs, should be a gating criterion.

RRI Eligibility Formula adjustments

Generation Resource Reliability Impact (30%)	In-Service Date, Viability (35%)	Location (10%)	Cost/Benefit (25%)
UCAP (15%) • Rank highest to Lowest UCAP ELCC ranking (15%) • Largest load carrying capability ranked highest to lowest 10 MW UCAP Minimum	 Critical Path construction schedule Validate by PJM (Target is June1,2029 or sooner) System Impact Offering into subsequent BRAs 	Adder for locating in a zone that cleared above the rest of the RTO for a BRA for a future DY.	 Cost \$/MW, lower has higher weighting Mitigate transfer limitations Top 3 Order 1920-A benefits Cost protection to other consumers Developer rate of return, lower is higher weight

The undersigned consumer advocates propose the following adjustments to PJM's proposed RRI formula, rank and then choose projects up to 19GW.

Ohio Consumers' Counsel

Citizens Utility Board of Illinois

New Jersey Division of Rate Counsel

Maryland Office of People's Counsel