



Americans for a Clean Energy Grid's Limited Feedback on PJM Policy-Driven Deactivation Methodologies

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Americans for a Clean Energy Grid (ACEG) appreciates the opportunity to provide feedback on PJM's questions regarding developing a methodology for capturing policy-driven retirements. ACEG commends PJM for requesting early stakeholder input and hopes that the current request is the start of an iterative process for stakeholders to provide input on analyzing generation retirements rather than a single and final opportunity for feedback.

ACEG recommends that PJM reconsider using policy-driven deactivations as the starting point for assessing factors 1, 2, 3, 5, and 7. Instead, ACEG encourages PJM start its proactive retirement analysis by modeling technical factors that impact plant retirement decisions, such as plant age and efficiency. Technical factors play an integral role in generation owner decisions as to prudence of continuing to run specific plants. They are, additionally, an impartial and even-handed method to determine which plants may retire across the PJM states. ACEG's May 2024 report, [Transmission Planning for PJM's Future Load and Generation Version 1](#), provides (at pages 24-30) a detailed explanation of best available data inputs and sample modeling using technical factors to analyze generation retirement.

ACEG further recommends that PJM consider policy-driven deactivations in a parallel analysis so that PJM and its stakeholders can better understand which plants are potentially subject to retirement under both a technical and policy analysis and which plants may be subject to retirement only under policy-driven scenarios. An example of such parallel analysis is provided in ACEG's [Transmission Planning for PJM's Future](#) (at pages 24-29) which offers sample modeling comparing expected age-based retirements versus expected retirements driven by Illinois and New Jersey regulations.

By following ACEG's modeling recommendations, PJM can help minimize some of the potential uncertainty associated with determining which retirements may result from federal, state, and local policies.