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The Honorable Jessica Fitzwater
County Executive
Frederick County Government
Winchester Hall
12 E. Church St.
Frederick, MD 21701

Oct. 3, 2024

Dear Ms. Fitzwater:

Thank you for your correspondence and invitation. I can certainly appreciate the challenging position that you and other respected governmental officials find themselves in as a result of the Maryland Piedmont Reliability Project (MPRP). I am a former utility regulator from Ohio who was responsible for the siting of a number of electricity generation/transmission projects. So again, I can appreciate the concerns raised in your correspondence.

As you are aware, PJM plans and operates the bulk electric grid for 13 states and Washington, D.C. We are an independent, federally regulated organization that operates as an effective nonprofit. We do not have shareholders, and we are not profit-driven. This allows us to focus on our mission as mandated by the federal government, which is to maintain the reliability of the regional power grid. We leverage competition to try and do this affordably.

When PJM identifies transmission needs, we open competitive planning "windows" so that transmission owners and other developers can submit proposed solutions they've designed through a competitive process. When a solution is selected and approved by the PJM Board of Managers, the developer seeks siting approval, constructs, and maintains the substations and transmission lines included in its proposal. It should be noted that none of the proposals PJM received for this particular section were in existing rights of way.

It is important to note that PJM does not have a role in the ultimate route of the line. The Maryland Public Service Commission (MD PSC) is the siting authority for this project and to my knowledge, no application for siting has been filed yet by Public Service Enterprise Group (PSEG). In addition, PJM does not select the line's path. This will be done by PSEG who was selected to try and fulfill the electricity need identified by PJM.

There is a multi-faceted need for this project. Historically, Maryland imports 40% of its power. In addition, much of the eastern part of the state is devoid of bulk transmission infrastructure, so moving power across the region is challenging. At the same time, Maryland is shutting down electric generation without new generation replacing it.

Maryland has seen the retirement of 6,000 MW of resources since 2018, with the addition of only 1,600 MW of resources during that time frame. In 2023 alone, 14 units announced their deactivation. Maryland's future electricity demand is also growing due to the proliferation of data centers as well as the electrification of vehicles and HVAC systems. The need for this project is indeed multifaceted.

Transmission owners that have been selected to fulfill electricity needs identified by PJM are deeply experienced and more than capable of explaining the above system dynamics. They have done so throughout our history of selecting projects to fulfill these needs. PJM, again operating as an effective nonprofit, works across 14 jurisdictions

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collectively spanning over 300 counties. We select innumerable projects to fulfill electrical needs on a consistent basis. While I can appreciate your positioning on MPRP, PJM is simply not staffed to attend each public hearing or meeting that is requested of us. For MPRP, those requests have been numerous.

While PJM is not able to attend your meeting, please be aware that PJM followed its federally approved process in selecting the MPRP project, holding a series of open meetings over most of 2023 to analyze, study, and discuss the grid's regional transmission needs and the drivers behind them.

From February through December 2023, PJM held eight open stakeholder meetings on the proposal process, including with the Independent States Agencies Committee, which is run by state officials and devoted to understanding transmission needs for the region. In attendance at each of these meetings were Maryland state governmental agencies, including the Maryland Public Service Commission and the Maryland Office of People's Counsel.

From July 9–11, 2024, PJM attended six PSEG public information sessions in Maryland when introducing the MPRP project to communities along the proposed route. We also attended a recent discussion organized by local officials and were able to share much of what is discussed above about Maryland's dire need for energy infrastructure. PJM will continue to engage with public officials on this project and the broader concerns we have developed about Maryland's power grid challenges.

Sincerely,

A handwritten signature in black ink, appearing to read "AZH".

Asim Z. Haque
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