



Chairman Willie Phillips  
Commissioner James Danly  
Commissioner Mark Christie  
Commissioner Allison Clements  
Federal Energy Regulatory Commission  
888 First St. NE  
Washington, DC 20426

Re: PJM Capacity Market Forum, Docket No. AD23-7

Dear Chairman Phillips and Commissioners Danly, Christie, and Clements,

We are pleased that the Commission is holding a forum to discuss the PJM capacity market. As you are aware, the PJM capacity market is rapidly changing as load continues to grow, older generation retires, and more clean energy resources come online. We applaud the Commission for addressing many of these issues at the upcoming forum.

After reviewing the agenda for the PJM Capacity Market Forum, we were surprised to see a lack of representation from the clean energy industry. Many representatives from this industry self-nominated to participate in the forum. However, the Commission did not invite any of these representatives to participate.

Clean energy, including generation, storage, demand response, distributed energy resources, and efficiency represent critical resources. While renewable generation is a small portion of the current PJM resource mix, it represents the overwhelming majority of the capacity of the PJM interconnection queue. Meanwhile, demand response continues to participate primarily as a capacity resource and the main avenue for customers to directly participate in PJM's markets to support reliability at least cost. Today, DERs such as customer-sited storage have limited access to PJM's capacity market.

Collectively, getting participation right for these resources in the capacity market is key to broader market reform. Our industry is heavily invested in the PJM capacity market and is creating innovative energy products to provide that capacity. In addition to our advocacy before the Commission in numerous PJM capacity market proceedings, we are active participants in PJM's Critical Issue Fast Path stakeholder process. To highlight, renewable companies have put [forward](#) four of the thirteen stakeholder [proposals in that process so far](#).

We believe the Commission would benefit from hearing the perspective of the clean energy industry at this forum. We are concerned that failure to include the perspective of this industry risks distorting the Commission's view of the future of PJM's capacity market and the innovative resources that will participate in this market. We will be submitting comments in this proceeding after this forum. However, the inability to address any misstatements about the clean energy industry at the forum, in real-time, will leave other commentors in the proceeding relying on incomplete, and potentially inaccurate, information. In short, the record in this proceeding will be built upon a foundation that is missing critical pieces.

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We ask that you please reconsider including a representative from the clean energy industry as a panelist so that we may participate in the Commission's forum. In particular, we recommend accepting the prior nominations of Rahul Kalaskar of AES Clean Energy Development, LLC, Zander Bischof of MN8 Energy LLC and/or Molly Jerrard of Enel North America and inviting them to participate in the forum.

Sincerely,

/s/ Jon Gordon

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