



**IN THE MATTER OF NEW JERSEY'S GROWING CONCERNS  
SURROUNDING RESOURCE ADEQUACY AND PARTICIPATION IN  
REGIONAL WHOLESALE ELECTRICITY MARKETS**

**Docket No. QO25060358**

**Post-Technical Conference Comments of the PJM Power  
Providers Group (P3)**

**Submitted August 19, 2025**

**1. Introduction**

The PJM Power Providers Group<sup>1</sup> appreciates the New Jersey Board of Public Utilities (the “Board” or “BPU”) convening the August 5, 2025, Resource Adequacy Technical Conference, which spotlighted challenges of resource adequacy amid unprecedented load growth. The Board should be applauded for a successful technical conference and P3 was pleased to participate in Panel Three. P3 welcomes the opportunity to share additional insights with these comments regarding PJM’s initiatives to maintain reliability and ensure fair, efficient outcomes for New Jersey ratepayers. Many P3 members own assets in New Jersey and represent many MWs serving New Jersey customers. P3 members that own assets in New Jersey include the following:

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<sup>1</sup> P3 is a non-profit organization dedicated to advancing federal, state and regional policies that promote properly designed and well-functioning electricity markets in the PJM Interconnection, L.L.C. (“PJM”) region. Combined, P3 members own over 88,000 MWs of generation assets and produce enough power to supply over 63 million homes in the PJM region covering 13 states and the District of Columbia. For more information on P3, visit [www.p3powergroup.com](http://www.p3powergroup.com). The comments contained herein represent the position of P3 as an organization, but not necessarily the views of any particular member with respect to any issue.



### **Alpha Gen**

- Bergen - 1,245 MW (dual-fuel)
- Burlington - 168 MW (dual-fuel)
- Kearny - 456 MW (dual-fuel)
- Linden - 1,639 MW (dual-fuel)
- Sewaren 538 MW (dual-fuel)

### **Calpine**

- Cumberland Energy Center - 191 MW (dual-fuel)
- Sherman Ave Energy Center - 92 MW (dual-fuel)
- Vineland Energy Center - 4 MW (solar)

### **Cogentrix**

- Lakewood - 280 MW (natural gas)
- Ocean Peaking – 374 MW (natural gas)

### **CPV**

- Woodbridge Energy Center - 725 MW (natural gas)

### **JERA Americas**

- Linden - 980 MW (gas and steam)

### **LS Power**

- MARS Solar Facility - 2.2 MWdc (solar)
- West Deptford - 738 MW (natural gas)
- Yards Creek - 420 MW (hydroelectric)

### **Red Oak**

- Sayreville - 832 MW (natural gas)

### **Vistra**

- Sayreville CCGT - 349 MW (natural gas)



P3 submitted pre-conference comments and will not repeat those comments here but rather supplement them with additional thoughts based on testimony presented at the conference and subsequent events.

## **2. Load Growth in PJM Must be Better Understood**

The BPU heard a lot of testimony about load growth on August 5. It is clear that load growth is real in PJM; however, the magnitude of that growth is not well understood. The BPU has limited jurisdiction on matters related to supply growth, but on the demand side of the equation the Board could play a more active role in helping PJM get a more accurate grasp on the scale and pace of any load growth.

Accurate load forecasts are essential to a well-functioning capacity market that can send appropriate signals to market participants. Developing an in-house expertise on load forecasting could serve the BPU well moving forward. Data centers present new and unique challenges that need to be understood if resource adequacy is to be cost effectively achieved. The BPU could be a helpful resource to New Jersey's utilities, PJM and other states as it relates to load forecasting. This action does not require any legislative authorization and could be commenced quickly.

As part of the technical conference, the Board heard PJM articulate that it expects most of the load growth between now and 2030 to be from data center demand. Specifically, PJM offered that 30 of the 32 gigawatts of expected growth by 2030 would be from data center demand. That said, the BPU and state policymakers in PJM need confidence in that number and need to consider the consequences of that number being wrong. This insight into load growth in PJM must be the lens through which any state, federal and PJM policies are considered as policies are crafted to nurture the development of data centers while protecting non-data center customers.

## **3. State Policies Should Avoid Putting Risk on Captive Ratepayers as Demand on the System Increases**

P3 appreciates that there is a lot of concern among state policymakers about rising prices and questions about the sufficiency of supply. P3 applauds the Board for taking proactive measures like this proceeding; however, New Jersey needs to be careful not to hastily respond to the pressures of the moment and make decisions that could burden consumers for decades with costs that they otherwise should not have paid.

The Board heard a lot of discussion about uncertainty surrounding the load forecast. The Board heard near universal agreement that the load forecast is likely overstated, but to



degrees that are largely unknown. The risk of load forecast error is high, and the Board needs to be careful that its policies appropriately assign the risk of load forecast error to either the data centers or the merchant generator community and not put this risk on residential consumers (for example, by authorizing the utilities to build rate base generation to address the load forecast). Data centers and merchant generators are sophisticated entities that can manage that risk. Adding load forecast risk onto the backs of residential consumers through utility rate-based generation or long-term Purchase Power Agreements, would be unfair to those consumers and likely lead to those consumers paying more than they should. As P3 pointed out in its initial comments, New Jersey already tried such an approach with the LCAPP program which would have led to over \$1 billion in additional charges had the program not have been deemed unconstitutional.<sup>2</sup>

#### **4. PJM's Fast-Path Response to Large Load Additions**

PJM's recently announced Critical Issue Fast Path ("CIFP") to address issues related to large load additions offers an encouraging first step to develop rational policies surrounding the addition of data center load.<sup>3</sup> As part of the process, PJM will focus on:

- Developing reliability-focused solutions to integrate large loads rapidly without compromising adequacy, potentially via transitional or permanent mechanisms.
- Establishing clear reliability criteria for triggering and retiring such measures.
- Reviewing interconnection rules to better address resource adequacy—especially in light of rapid load additions.
- Enhancing coordination among PJM, load-serving entities, data center customers, and states to respect jurisdictional boundaries and ensure orderly integration.
- Targeting implementation in time for the 2028/2029 RPM Base Residual Auction, with a pre-CIFP workshop in August 2025 and a potential FERC filing by December 2025.

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<sup>2</sup> Pre-Conference Comments of the PJM Power Providers Group, submitted July 28, 2025, In the Matter of the New Jersey's Growing Concerns Surrounding Resource Adequacy and Participation in Regional Wholesale Electricity Markets, Docket No. QO25060358 at pp. 13-15.

<sup>3</sup> <https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2025/20250808-pjm-board-letter-re-implementation-of-critical-issue-fast-path-process-for-large-load-additions.pdf>



P3 looks forward to participating in this process and is optimistic that PJM, states, and stakeholders can develop policies that support the expansion of data centers in the PJM footprint while not unfairly burdening other consumers with additional costs. This time-limited process will require focused attention to produce results that can be implemented in time for the BRA in the summer of 2026.

## **5. Conclusion**

PJM's CIFP initiative represents PJM's responsiveness to emergent system stressors. PJM should be applauded for advancing this conversation, but, as always, the ultimate product must be grounded in market principles and equitable to all consumers. By engaging constructively, the Board can help guide these efforts to ensure that they advance reliability and affordability priorities consistent with New Jersey's competitive market structure. P3 stands ready to partner with the Board and stakeholders in the CIFP process and in any further resource adequacy evaluations.