



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

Sent via email

February 4, 2022

Asim Z. Haque
Vice President, State and Member Services
PJM Interconnection, LLC
2750 Monroe Blvd.
Audubon, PA 19403

Dear Mr. Haque,

I am writing in response to your letter dated February 3, 2022.

Section 9.15 (k-5) of the Climate and Equitable Jobs Act provides that no unit may emit, in any 12-month period, CO₂e or copollutants in excess of that unit's existing emissions for those pollutants. Notwithstanding this or any other applicable zero emissions or emissions reduction deadline, Electric Generating Units and Large Greenhouse Gas Emitting Units are allowed to temporarily continue emitting greenhouse gases if it has been determined that ongoing operation is necessary to maintain power grid supply and reliability or to serve as an emergency backup to operations. The statutory operation exceptions do not apply until the applicable emissions deadlines or limits are reached. PJM has outlined defined scenarios in which it would utilize these statutory provisions that enable generators to run units in the event that the rolling emissions limits needed to be exceeded to maintain grid reliability and stability. While the statute provides relief for generators to continue to run in exceedance of an emissions deadline or restriction, it does not allow generators to not count the emissions during those PJM-defined run times towards any applicable statutory or permitting emissions limit or restriction.

Please let me know should you have further questions.

Sincerely,

A handwritten signature in blue ink that reads "Laura Roche".

Laura Roche
Chief of Staff

cc: Christian Mitchell, Deputy Governor of Illinois
Jessica Himes, First Assistant Deputy Chief of Staff for Policy, Governor's Office
Stephen Bennett, PJM Manager – Regulatory and Legislative Affairs