

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C.)

Docket No. ER26-2446-000

COMMENTS OF THE PJM POWER PROVIDERS GROUP

Pursuant to the May 4, 2026 Combined Notice of Filings #1 issued by the Federal Energy Regulatory Commission (the “Commission” or “FERC”) in the above-captioned proceedings, the PJM Power Providers Group¹ (“P3”) submit these comments² in response to PJM Interconnection, L.L.C.’s (“PJM”), May 1, 2026, proposed re-dated eTariff records of the PJM Open Access Transmission Tariff (“Tariff”) and the Amended and Restated Operating Agreement of PJM (“Operating Agreement”) pursuant to section 205 of the Federal Power Act (“FPA”)³ and part 35 of the Commission’s regulations.⁴ In part, PJM requests that the Commission accept its proposed updated eTariff records: effective date October 1, 2026 for the currently effective versions to replace the eTariff records scheduled to become effective on October 1, 2026 from Docket No. ER24-1772-000, and effective date December 1, 2026 for the eTariff records with revisions to implement Phase 2 of the Regulation Market reforms.⁵

¹P3 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 108,000 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.

²The 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. On May 21, 2026, P3 filed a doc-less Motion to Intervene in this proceeding.

³ 16 U.S.C. § 824d.

⁴ 18 C.F.R. part 35.

⁵ *PJM Interconnection L.L.C.*, Docket No. ER26-2446-000 (filed May 1, 2026) (“PJM Regulation Market Reforms Filing”).

I. COMMENTS

P3 supports PJM's foundational efforts to redesign and modernize the Regulation market. The structural reforms already instituted under Phase 1 have brought improvements to cost tracking and pricing clarity. P3 is confident that the separate RegUp and RegDown products proposed for Phase 2 will introduce an important layer of flexibility and accuracy to frequency regulation dispatch. PJM's commitment to refining these market mechanisms is commendable, and P3 remains a proponent of changes that align market compensation with actual operational capability.

Furthermore, P3 appreciates PJM's deliberate desire to implement these complex programmatic adjustments carefully. Given that there is no historical operating data for these new separate products within the PJM region, a meticulous approach to software testing, quality control, integration testing, and simulated price verification is crucial to avoiding unforeseen market disruptions. Allowing ample time for resource owners to adapt their internal systems and ensure vendor functionality is a prudent business measure that will ultimately save market participants from costly system compatibility failures at launch.

However, even the most well-considered and tested market changes are susceptible to unforeseen issues during their initial rollout. After the rollout of Phase 1 of PJM's Regulation Redesign resulted in unanticipated price spikes and certain resources not being committed, PJM, working with its vendor, made several "enhancements" to its Regulation market clearing software.⁶ This was a prudent and commendable step. It also illustrates why PJM has traditionally avoided implementing significant market changes during the winter season, a period historically

⁶ PJM Members Committee, Regulation Redesign Phase 1 Clarification to the IMM Report, (Jan. 22, 2026), [20260122-item-06---pjm-clarification-to-the-market-monitoring-report---presentation.pdf](#). PJM "went live" with the Phase One changes on October 1, 2025, but needed to make "post-go-live" changes on October 23, 2025. Fortunately, PJM had the luxury of making those adjustments during a period of low demand.

characterized by extreme grid volatility and severe operational stress due to spiking cold-weather power demands.

For this reason, P3 must question whether moving the target implementation date to December 1, 2026, represents the best path forward. Introducing unproven clearing engines and complex new bidding parameters under tight grid conditions creates avoidable risks. Instead of debuting a material system overhaul on the cusp of winter peak demand, P3 suggests that a March 1, 2027, implementation date would provide a significantly safer operational window. A spring rollout would bypass the threats of winter peak stresses and grant PJM and generation owners a stable, lower-demand environment to iron out any early implementation complication that may arise.

II. CONCLUSION

For the reasons stated herein, the Commission should approve a March 1, 2027, implementation date rather than PJM's suggested December 1, 2026 implementation date.

Respectfully submitted,

On behalf of The PJM Power Providers Group

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May 22, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on each person designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

Dated at Washington DC, this 22nd day of May, 2026.

On behalf of The PJM Power Providers Group

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