

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**PJM INTERCONNECTION, L.L.C.**

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**Docket No. ER24-1242-000**

**COMMENTS  
OF THE PJM POWER PROVIDERS GROUP**

Pursuant to the February 13, 2024 Combined Notice of Filings #1 issued by the Federal Energy Regulatory Commission (the “Commission” or “FERC”) in the above-captioned proceeding, The PJM Power Providers Group<sup>1</sup> (“P3”) submits these comments in response to the February 12, 2024, filing by PJM Interconnection, L.L.C. (“PJM”). The PJM filing concerns a one-time prospective waiver of the Open Access Transmission Tariff (“Tariff”), Attachment DD, section 5.4(a) to delay the commencement of the 2025/2026 Base Residual Auction by 35 days and thereby allowing the auction to commence on July 17, 2024; PJM is also requesting to the extent deemed necessary, a waiver of the pre-auction deadlines associated with the upcoming

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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 83,000 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).

Base Residual Auction to delay any pre-auction deadlines that have not passed as of the date of their filing, as specified in Attachment A of their filing (“PJM Waiver Request”).<sup>2</sup>

On February 15, 2024, P3 filed a doc-less Motion to Intervene. P3 respectively submits these comments,<sup>3</sup> in the above captioned proceeding.

## **I. COMMENTS**

P3 supports the PJM Waiver Request and urges the Commission to approve it. As PJM noted, Tariff, Attachment DD, section 5.4(a) specifies that “the Base Residual Auction for the 2025/2026 Delivery Year shall be conducted in June 2024.”<sup>4</sup> PJM scheduled the next Base Residual Auction based on this requirement for the 2025/2026 Delivery year to commence on June 12, 2024. However, given the recent Commission acceptance of the new marginal effective load carrying capability (“ELCC”) accreditation methodology and associated risk modeling enhancements, PJM is filing its Waiver Request to delay the upcoming auction by 35 days.<sup>5</sup> PJM notes that this delay is prudent given the recent changes. It is critical that accredited UCAP values are accurate, and that both PJM and market participants have confidence that they are calculated correctly. While P3 supports the orderly conduct of PJM Capacity Auctions and generally frowns on auction delays, in this case, given the need to absorb and understand significant new changes and the limited nature of the Waiver Request, P3 supports Commission approval.

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<sup>2</sup> PJM Interconnection, L.L.C., Docket No. ER242-1242-000 (February 12, 2024) (“PJM Waiver Request”).

<sup>3</sup> 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.

<sup>4</sup> PJM Waiver Request at p. 1.

<sup>5</sup> *See id.*

## II. CONCLUSION

P3 agrees with the PJM Waiver Request set forth by PJM in its February 12, 2024 filing. P3 urges the Commission to accept the PJM Waiver Request as submitted and expeditiously grant its request by February 26, 2024.

Respectfully submitted,

On behalf of The PJM Power Providers Group

By: Glen Thomas

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Dated: February 20, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the Official Service List compiled by the Secretary in this proceeding.

Dated at Washington, D.C., this 20th day of February, 2024.

On behalf of The PJM Power Providers Group

By: Diane Slifer

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