UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C.) **Docket No. ER26-313-000**

COMMENTS

OF THE PJM POWER PROVIDERS GROUP

Pursuant to the October 30, 2025 Combined Notice of Filings #2 issued by the Federal Energy Regulatory Commission (the "Commission" or "FERC") in the above-captioned proceeding, the PJM Power Providers Group[1] ("P3") submits these brief comments[2] in support of the October 29, 2025, filing by PJM Interconnection, L.L.C. ("PJM") requesting a limited and prospective waiver ("Waiver Request") of PJM's Open Access Transmission Tariff ("Tariff"), Part VIII, Subpart A, section 401(C), and any other necessary waivers, for Susquehanna Nuclear, LLC's ("Susquehanna") Unit 1 to restore 148 MW of Capacity Interconnection Rights ("CIRs") effective June 1, 2026.[3]

I. COMMENTS

P3 submits these brief comments in support of the PJM October 29, 2025, Waiver Request for limited, prospective waiver of Tariff provision or, in the alternative, relief pursuant to Federal

---

[1]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 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.

[2]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. On November 6, 2025, P3 filed a doc-less Motion to Intervene.

[3] *PJM Interconnection, L.L.C.,* Docket No. ER26-313-000 (filed October 30, 2025) ("Waiver Request").

Power Act § 309, shortened comment period, and expedited action. P3 urges the Commission to approve the request quickly so as to provide certainty in advance of the December Base Residual Auction ("BRA").

A. The Waiver Meets the Commission's Established Standards

P3 agrees that PJM's Waiver Request satisfies the Commission's four-part test for tariff waivers:

- Good Faith. The filing stems from PJM's reasonable effort to reconcile tariff provisions with evolving regulatory circumstances regarding co-located load and generation. PJM and Talen acted are acting in a good faith manner to address a problem created by an unforeseeable pattern of events.

- Limited Scope. The waiver is prospective, applies to a single resource, and concerns a finite quantity of CIRs (148 MW). The waiver also stems from unique circumstances that are unlikely to occur again.

- Concrete Problem. Absent Commission action, the market will lose access to deliverable capacity that remains physically available on the grid and is contractually obligated to load that PJM has included in its load forecast. Not taking this action would result in imbalance for supply and demand that is not beneficial to the market.

- No Undesirable Consequences. No market participant has objected to the waiver; the waiver merely restores pre-existing rights to their original configuration.

B. The Waiver Preserves Important Capacity-Load Relationships, so Reliability is Appropriately Reflected

The waiver is necessary because the 148 MW of load in question will become Network Load effective June 1, 2026, and, as a result PJM included that load in its load forecast for the 27/28 BRA.[4] Therefore, the capacity that is contractually obligated to the 148 MWs of load can only be offered into the December BRA if that capacity has its CIRs restored. Originally, this load-

[4] Note that proposed changes to the CIR allocation would be applicable to incremental auctions that have not been run yet.

capacity configuration was designed, with PJM's approval, to be a behind the meter arrangement; however, as a result of various factors, many of which were outside of PJM's and Talen's control, the arrangement has changed. Had the load in question remained behind the meter, there would be no need to restore the CIRs as the capacity associated with the CIRs would be obligated to the behind the meter load. However, under the new arrangement, the CIRs must be restored to serve the load that have been moved to in front of the meter. In these unique circumstances, granting this waiver is justified to appropriately reflect the 148 MWs of capacity in the BRA, given the matching load included in the load forecast.

II. CONCLUSION

For the reasons stated above, P3 urges the Commission to grant PJM's Waiver Request expeditiously, ideally on or before December 2, 2025, as requested. Doing so is the appropriate relief under the circumstances and furthers the Commission's policy of ensuring just and reasonable outcomes for PJM consumers.

Respectfully submitted,

On behalf of The PJM Power Providers Group

By: *<u>/s/ Glen Thomas</u>*
Glen Thomas
GT Power Group
101 Lindenwood Drive, Suite 225
Malvern, PA 19355
gthomas@gtpowergroup.com
610-768-8080

November 17, 2025

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 17th day of November, 2025.

On behalf of the PJM Power Providers Group

By: *\/s/ Diane Slifer*

Diane Slifer
GT Power Group
101 Lindenwood Drive, Suite 225
Malvern, PA 19355
gthomas@gtpowergroup.com
610-768-8080