Organization of PJM States, Inc. (OPSI)

President: **Hon. Edward S. Finley, Jr.,** Chairman, North Carolina UC
Vice President: **Hon. Andre T. Porter,** Commissioner, PUC of Ohio
Secretary: **Hon. Robert M. Hanna,** President, New Jersey BPU
Treasurer: **Hon. Greg R. White,** Commissioner, Michigan PSC

Members:
Delaware Public Service Commission ● District of Columbia Public Service Commission ● Illinois Commerce Commission Indiana Utility Regulatory Commission ● Kentucky Public Service Commission ● Maryland Public Service Commission Michigan Public Service Commission ● New Jersey Board of Public Utilities ● North Carolina Utilities Commission Public Utilities Commission of Ohio ● Pennsylvania Public Utility Commission ● Tennessee Regulatory Authority Virginia State Corporation Commission ● Public Service Commission of West Virginia.

April 15, 2013
(via email only)

Mr. Terry Boston
President and CEO
PJM Interconnection, L.L.C.
955 Jefferson Avenue
Norristown, PA 19403

Re: OPSI Resolution
Supporting the PJM/IMM Recommendation
For Revising the Must Offer Exception Deadline

Dear Mr. Boston,

At the OPSI Board meeting of April 4, 2013 the attached resolution regarding the must offer exception deadline proposal of PJM and the Independent Market Monitor passed unanimously. Please feel free to contact me with any questions you may have.

Sincerely,
/s/Gregory V. Carmean
Gregory V. Carmean
Executive Director

cc: OPSI Board Members
Dave Anders, Manager, PJM Stakeholder Affairs

249 E. Main Street, Bldg. 2 – Suite 1, Newark, DE 19711
Tel: 302- 266-0914
www.opsi.us

Organization of PJM States, Inc. (OPSI)

President: **Hon. Edward S. Finley, Jr.,** Chairman, North Carolina UC
Vice President: **Hon. Andre T. Porter,** Commissioner, PUC of Ohio
Secretary: **Hon. Robert M. Hanna,** President, New Jersey BPU
Treasurer: **Hon. Greg R. White,** Commissioner, Michigan PSC

Members:
Delaware Public Service Commission ● District of Columbia Public Service Commission ● Illinois Commerce Commission Indiana Utility Regulatory Commission ● Kentucky Public Service Commission ● Maryland Public Service Commission Michigan Public Service Commission ● New Jersey Board of Public Utilities ● North Carolina Utilities Commission Public Utilities Commission of Ohio ● Pennsylvania Public Utility Commission ● Tennessee Regulatory Authority Virginia State Corporation Commission ● Public Service Commission of West Virginia.

OPSI RESOLUTION # 2013-3
OPSI Resolution to Support the PJM/IMM Recommendation for Revising the Must-Offer Exception Deadline

WHEREAS, owners of generation in the PJM footprint are required to file a "Request for Exception" to the Reliability Pricing Model's (RPM's) must-offer requirement no later than 120 days prior to the Base Residual Auction (*i.e.* 120 days prior to mid-May); *and*

WHEREAS, the purpose of the 120-day requirement is to ensure that PJM and its Independent Market Monitor (IMM) are given a reasonable amount of time to review such an exception request and ask for a FERC resolution should a disagreement arise; *and*

WHEREAS, according to PJM and the IMM, the 120-day requirement for a Request for Exception (if due to a generating unit deactivation) does not afford a reasonable amount of time for PJM to incorporate the impact of a generating unit's deactivation in the upcoming Base Residual Auction (BRA), nor does it provide a reasonable amount of time for the market to react by offering potential new generation in the upcoming BRA**;** *and*

WHEREAS, PJM and the IMM are recommending that the deadline for a "Request for Exception" to the RPM must-offer requirement should be made no later than five months prior to the posting of the BRA planning parameters (*i.e.* five months prior to early February) ; *and*

WHEREAS*,* the PJM/IMM recommended increase of the time between a "Request for Exception" to the RPM must-offer requirement and the upcoming BRA will allow a sufficient amount of time for PJM to conduct appropriate analyses, and for the market to react to such information; *and*

NOW, therefore, be it resolved, that the OPSI Board supports the PJM/IMM recommendation for revising the must-offer exception deadline, and accordingly, supports the revision of Section 6.6(g)(A) of Attachment DD of the Open Access Transmission Tariff to be consistent with the PJM/IMM recommendation.

Approved unanimously by the Board of Directors of the Organization of PJM States, Inc. on April 4, 2013