Stakeholder Feedback on Reliability Backstop Procurement Survey Responses

Question 1	
Company Name	**Please provide your thoughts on using the Critical Issue Fast Path (CIFP) process following the hiatus.**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	fine.... in an ideal world PJM should put foot down and just let current market work...if prices are high for a few years so be it...let the states and feds deal with their constituent fall out...if gov't wants to reregulate so be it...good luck to them if they choose that path...
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	CIFP is the best approach because it affords stakeholders the opportunity to present their thoughts to the Board
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	Utilization of the full CIFP process runs the risk of repeating much of the conversation in the recently concluded RBA Workshop. PJM may consider conducting a CIFP Stage 4-like process. This type of process would allow for presentation of the PJM proposal, stakeholder presentations and comment to the Board concluding with an MC vote.
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	Not a fast enough process

1. Chesapeake Climate Action Network	NA
1. Ceres	NA
1. Third Act Maryland	NA
1. Calibrant Energy	Calibrant believes that a more deliberative process is necessary given the market impact of the filing and therefore prefers the 9.2(b) process.
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Duke Energy believes that the CIFP process should be used.
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	A time-limited and focused CIFP process is preferable because it would provide a formal and well understood process for stakeholders to present proposals and design component alternatives to the PJM proposal. Given the extensive work already completed in the workshops, PJM and stakeholders could move quickly through the first stages of the process and focus on stages 3 (proposal development) and 4 (final meeting with the Board and vote).
1. Duquesne Light Company	N/A
1. Public Service Electric and Gas Company	The Board did not direct the use of the CIFP process to address this issue, and PSEG does not support the use of CIFP for the RBA reforms. As the CIFP Large Load Additions effort showed, it is unlikely that stakeholder consensus will be achieved on any particular proposal. Additionally, stakeholders have had ample opportunity through the Workshops to provide PJM with feedback on potential RBA reforms that will shape PJM's proposal. PJM's focus should be on developing a robust proposal that can be implemented in time for a September backstop auction, that minimizes impact to the existing capacity construct while securing the amount of capacity determined to be needed by PJM to ensure system reliability.

1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	NA
1. PA House of Representatives, District 155	N/A
1. Clean Energy Buyers Association (CEBA)	CEBA supports using the CIFP process following the hiatus, to facilitate a more structured discussion with stakeholders of PJM's proposal and competing alternatives. The CIFP process also has the advantage of both inviting members of the Board to hear directly from stakeholders while also explicitly permitting non-Members to engage. This latter feature is particularly crucial to ensure that associations and coalitions representing large load customers can participate in the dialogue.
1. CP Energy Marketing (US) Inc.	Should PJM utilize a CIFP process, stakeholders should be able to vote for specific elements of the RBP rather than just for complete packages. This will provide more clarity on stakeholder consensus.

1. PJM State Legislators	To that end, we were pleased to support the Critical Infrastructure Fast Path process last year, with our Ratepayer Protection Proposal in collaboration with Natural Resources Defense Council (NRDC). Our proposal included the BYOC (bring your own capacity) and connect-and-manage structure as the only true solutions to prevent cost shifting from the large data centers to residential ratepayers. We also support the Statement of Principles regarding PJM issued by the White House and participating Governors on January 16, which calls for protecting residential customers from capacity price increases, and commend the companies that signed the White House Ratepayer Protection Pledge on March 4, 2026, committing to protect American consumers from price increases associated with data center energy and infrastructure needs. As the stakeholder process continues, we urge PJM to develop a Reliability Backstop Procurement and related market changes that protect ratepayers, ensure new supply is built after clearing the interconnection queue, and remove large new data center loads from the Base Residual Auction until they bring their own capacity. As this process evolves, PJM must also ensure that reliability and cost allocation can be directed to load-serving areas that align with state boundaries. PJM control zones often span multiple states—for example, the Allegheny Power (AP) zone, which includes portions of Pennsylvania, West Virginia, Maryland, and Virginia. Market structures should therefore allow costs and obligations to be attributed to the state-specific portions of these zones so that states can implement policies within their jurisdiction. Given the extraordinary pace of load growth, the Reliability Backstop Procurement could become one of the most consequential multi-billion-dollar auctions in PJM's history. Its design must protect ratepayers, work with interconnection queue timing, and prevent the costs of private data center expansion from being imposed on the public. We stand ready to work constructively with PJM, the Governors' Collaborative, and other ratepayer advocates to ensure that the interests of the 67 million retail customers in the PJM region are protected. We appreciate your consideration and would welcome the opportunity to discuss these principles with you. We also welcome further discussion on any other issues where PJM believes state legislators could assist new entry or resource adequacy.
1. Voltus, Inc.	Voltus anticipates that following the hiatus, certain Backstop design elements may warrant additional but streamlined stakeholder discussion. With this in mind, a CIFP process would be appropriate, whereas a 9.2(b) notice and consultation process would be too limited given the breadth of Key Design Considerations on which PJM will provide decisions with its April 10 filing.
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A

1. Office of the Illinois Attorney General	PJM has not provided stakeholders with its full proposal. Therefore, a stakeholder process should occur after the hiatus.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A

Question 2	
Company Name	**Please provide your thoughts on using the 9.2(b) process, providing notice and consultation, following the hiatus.**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	abstain
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	The 9.1(b) process does not provide for the same level of stakeholder interaction with the Board.
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	The 9.2(b) process does not have a clear opportunity for stakeholder comments or a voting mechanism. PJM's FERC filing implementing an RBA can have significant impacts to PJM markets and must include feedback from the stakeholders.
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	The best process since time is of the essence
1. Chesapeake Climate Action Network	NA
1. Ceres	NA
1. Third Act Maryland	NA
1. Calibrant Energy	As noted above, Calibrant prefers the 9.2(b) process to allow for more stakeholder input and discussion
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Unsure
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	A 9.2(b) consultation could be an appropriate stakeholder process if stakeholders are given an opportunity to develop alternatives to PJM's proposal along with a "final meeting" in the same format as Stage 4 of the CIFP process. This would provide stakeholders an opportunity to present alternate packages directly to the PJM Board and engage with the Board on questions and discussion.
1. Duquesne Light Company	N/A
1. Public Service Electric and Gas Company	PSEG supports the use of PJM's Tariff section 9.2(b) process for PJM to consult with Transmission Owners and Members in advance of filing RBA reforms. This process will provide stakeholders an opportunity to provide additional feedback to PJM on PJM's proposal for consideration. As noted in our response to question 1, stakeholders have had ample opportunity to provide thoughts and feedback on the RBA to date. As a result, a stakeholder process such as CIFP will not add additional value, particularly under the current time constraints.

1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	NA
1. PA House of Representatives, District 155	N/A
1. Clean Energy Buyers Association (CEBA)	CEBA discourages PJM from using the section 9.2(b) process, as it lacks the same degree of structure and transparency as exists with the CIFP process. This will place PJM's proposal on unequal footing relative to alternative ideas that stakeholders may bring to the table and, in turn, risks excluding otherwise worthy counterproposals. Additionally, the consultation process is not well-defined, raising significant transparency concerns. For example, it is unclear based on the tariff language to what extent non-Members would be permitted to engage, which risks excluding participation by associations and coalitions representing large load customers.
1. CP Energy Marketing (US) Inc.	If the board already has a clear vision of what direction to take the specifics of the RBP, the 9.2(b) process may be more appropriate for a quicker filing and additional time for implementation.
1. PJM State Legislators	To that end, we were pleased to support the Critical Infrastructure Fast Path process last year, with our Ratepayer Protection Proposal in collaboration with Natural Resources Defense Council (NRDC). Our proposal included the BYOC (bring your own capacity) and connect-and-manage structure as the only true solutions to prevent cost shifting from the large data centers to residential ratepayers. We also support the Statement of Principles regarding PJM issued by the White House and participating Governors on January 16, which calls for protecting residential customers from capacity price increases, and commend the companies that signed the White House Ratepayer Protection Pledge on March 4, 2026, committing to protect American consumers from price increases associated with data center energy and infrastructure needs. As the stakeholder process continues, we urge PJM to develop a Reliability Backstop Procurement and related market changes that protect ratepayers, ensure new supply is built after clearing the interconnection queue, and remove large new data center loads from the Base Residual Auction until they bring their own capacity. Four principles should guide this effort:
1. Voltus, Inc.	As noted in answer to the first question, Voltus anticipates that following the hiatus, certain Backstop design elements may warrant additional but streamlined stakeholder discussion. With this in mind, a CIFP process would be appropriate, whereas a 9.2(b) notice and consultation process would be too limited given the breadth of Key Design Considerations on which PJM will provide decisions with its April 10 filing.
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A
1. Office of the Illinois Attorney General	Again, PJM has not provided stakeholders with its full proposal. Therefore, a stakeholder process should occur after the hiatus.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A

Question 3	
Company Name	**Please provide any other thoughts on the stakeholder process following the hiatus.**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	abstain
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	It is a good idea to keep the lines of communication open for others to share their thoughts and ideas.
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	The post-hiatus stakeholder process should include 1.) a concise presentation of the full PJM proposal; 2.) a mechanism to allow stakeholders to present alternative proposals and provide specific feedback on PJM's proposal; and 3.) a vote indicating to the PJM Board the stakeholder preferences on the packages.
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	Not necessary since PJM has held many workshops already
1. Chesapeake Climate Action Network	PJM should ensure that any consultation with stakeholders that occurs during the hiatus period is inclusive of all stakeholder groups, including elected officials, regulators, environmental groups, and consumer advocates. To the extent that PJM decides on specific “non-negotiable” aspects of the RBA, these should be justified and explained to the stakeholders. Any open, “undecided” design components of the RBA should be open to stakeholder feedback with clear opportunities for input. In particular, we think the following elements should remain open to stakeholder feedback after the hiatus: Procurement targets Eligible buyers and sellers Risk and cost allocation, including counterparty risk Auction timing Interactions with the Base Residual Auction and Connect & Manage

1. Ceres	PJM must ensure that its stakeholder engagement during the hiatus period is genuinely inclusive, bringing all relevant voices to the table, including elected officials, regulators, environmental organizations, and consumer advocates, to reflect the full range of communities and interests affected by energy transition decisions. Where PJM establishes fixed parameters for the Reliability Backstop Auction design, those decisions must be transparently communicated and substantively justified. Stakeholders deserve to understand the rationale behind any constraints placed on the process. Equally important, design elements that remain unresolved must be subject to meaningful input, not nominal consultation. Ceres believes the following components are critical to sustainable investment planning and must remain open to stakeholder feedback following the hiatus: - Procurement targets, which will directly shape the scale and pace of clean energy deployment across the region - Eligible buyers and sellers, determining which market participants can drive and access clean capacity investment - Risk and cost allocation, including counterparty risk, critical to ensuring that financial exposure is fairly distributed and does not unduly burden ratepayers or deter long-term capital commitments - Auction timing, with significant implications for investment certainty and project development pipelines - Interactions with the Base Residual Auction and Connect & Manage - essential to ensuring market coherence and avoiding outcomes that undermine reliability or clean energy goals Getting these design choices right is foundational to restoring investor confidence and enabling the sustained capital deployment the region's grid transformation requires.
1. Third Act Maryland	PJM needs to ensure that any consultation with stakeholders that occurs during the hiatus period is inclusive of all stakeholder groups, including elected officials, regulators, environmental groups, and consumer advocates. In particular Third Act Maryland thinks the following elements should remain open to stakeholder input: Procurement targets Eligible buyers and sellers Risk and cost allocation, including counterparty risk Auction timing Interactions with the Base Residual Auction and Connect & Manage
1. Calibrant Energy	Stakeholders must have an opportunity to provide concrete feedback on the PJM proposal and there should be time for PJM to incorporate the feedback into their filing.
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Unsure
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	Constellation appreciates the engagement of the PJM Board throughout the backstop process. Engagement by the PJM Board at stakeholder meetings focuses and elevates the discussion and gives stakeholders confidence in the process. For this reason, Constellation does not have a strong opinion on what stakeholder process is employed by PJM after it releases its package but prior to a final decision by the PJM Board, provided two critical criterial are met: 1) stakeholders have an opportunity to develop alternate packages to PJM's proposal; and 2) stakeholders have an opportunity to present those proposals directly to the PJM Board during a CIFP Stage 4 style meeting and take questions and discuss their proposal with the PJM Board.
1. Duquesne Light Company	Whichever process PJM elects there should be a stakeholder vote that is indicative and informative for the PJM Board. PJM should consider providing input and guidance that will help to manage the number of proposals voted on and to encourage stakeholders to negotiate and consolidate proposals. This could include providing guidance on what portions of the PJM proposal, if any, are non-negotiable or must-haves and any approaches or items PJM has decided and will not reconsider.
1. Public Service Electric and Gas Company	Please see PSEG's response to question 2.

1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	NA
1. PA House of Representatives, District 155	N/A
1. Clean Energy Buyers Association (CEBA)	N/A
1. CP Energy Marketing (US) Inc.	N/A
1. PJM State Legislators	X
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A
1. Office of the Illinois Attorney General	The Office of the Illinois Attorney General has joined with other PJM consumer advocates' offices to develop a proposed backstop procurement design to address the need for more capacity to serve rapidly proliferating data centers. These comments on the stakeholder process thus far are offered separately to that more detailed position submitted by the Joint Consumer Advocates on March 11, 2026. PJM's "firm design principles" are inconsistent with the principles set forth by the White House and PJM Governors as well as the Ratepayer Protection Pledge made by the White House and data center companies. The stakeholder process should produce solutions that are consistent with the principles that are set forth in the documents issued by governmental leaders that address the unique challenges of data centers. PJM should design the Reliability Backstop Procurement ("RBP") to be consistent with the principles set forth in the "Statement of Principles regarding PJM" issued by the National Energy Dominance Council and the Governors of PJM States ("Statement of Principles") as well as the recently released "Ratepayer Protection Pledge" released by the White House ("Pledge") and the Advanced Notice of Proposed Rulemaking issued by the Department of Energy. These documents recognize that data centers are presenting unique challenges to grid reliability. The third bullet point in the Statement of Principles plainly recognizes that their "size and the risks they pose to resource adequacy make today's data centers unique." Therefore, "PJM should allocate the cost of any new capacity procured through the [RBA] to load serving entities (LSEs) with new data centers that have not self-procured new capacity or agreed to be curtailable." Statement of Principles at Bullet 3. Similarly, the Pledge signed by hyperscalers and AI companies that are driving the growth of large data centers states that data center companies "will build, bring, or buy the new generation resources and electricity needed to satisfy their new energy demands, paying the full cost of those resources whether by building, or buying from, new or otherwise additive power plants." The Pledge also states that data center companies "will pay for all new power delivery infrastructure upgrades required to service their data centers, including adequate network upgrade costs to ensure that these expenses are not passed on to the ordinary household." Pledge at para. 1, 2. Taken together, these amount to a policy statement ¬ which is consistent among White House, the Governors of the PJM States, and data center companies themselves — that the costs to add new power and infrastructure to serve data centers should be paid for by the data centers alone. The "Firm PJM Design Components" and its "Refined Thinking" seem poised to depart from this core policy statement. At the end of the workshops, PJM appeared to favor an approach where PJM would determine the procurement target, serve as the administrator and counterparty in the auction, and "rationally allocate" costs to the "zone/TO/EDC where the load is located." Rather than a targeted process designed to more efficiently identify and match data center load with needed supply and properly assign costs to the cost causers, PJM's refined view sounds like a second capacity auction that does nothing to mitigate the risks of substantial capacity cost increases to existing ratepayers. If this is indeed the path PJM decides upon, it would be inconsistent with the consensus policies put forth by the White House, the Governors of the PJM states, and data center companies themselves and a fundamental failure to address

	the issue at the heart of this stakeholder process – the extraordinary growth in demand due to hyperscale data center development. Data center load is the reason for capacity market shortages and spiking prices. PJM's Independent Market Monitor has released analyses of the recent capacity auctions showing that virtually all of the recent price increases have been the result of data centers. In the workshops, the IMM again noted that the capacity market is only short because of data center demand. We are not aware of any analysis that has been published to date, by PJM or anyone else, that specifically contradicts the IMM's view. In this process, stakeholders have called into question the IMM's analysis without producing a contrary analysis. Advancing positions without data or analysis is contrary to an informed stakeholder process. While there has been commentary that load growth is not only data centers, organic load growth is relatively limited, balanced by countervailing trends such as energy efficiency and behind-the-meter generation and storage, and is generally captured in traditional load forecast models. Large load adjustments for data center demand, on the other hand, are "unique" in the challenges they pose for forecasting, both because of the size and the speculative nature of such adjustments. PJM is well aware of this challenge. In its "Key Design Considerations," PJM implicitly recognizes the key role played by data center load in the current load growth forecasts and acknowledges that there is risk of overbuilding "[i]f the data center load does not materialize" as forecasted. PJM also notes that if the RBA only targets "firm" data center load, there is risk that it will not procure enough supply "to ease the current and near-term future resource adequacy challenges." Implicit in PJM's assessment is that the risks to resource adequacy, and the potential costs to mitigate it, are created entirely by the amount and uncertainty of data center loads. Existing ratepayers did not create this risk, so they should not bear the costs of the process designed to mitigate it. A Reliability Backstop Procurement that includes all load shift risks to ratepayers who are not responsible for causing the costs. Despite the principles set forth by the White House and PJM Governors and the Ratepayer Protection Pledge, the stakeholder process is now designing a RBP that would assign costs to all load, rather than limiting it to include only the data center load that made it necessary in the first place. This will result in an unjust and unreasonable cost shift to other ratepayers. The most critical ratepayer protection principle, as reflected in the Statement of Principles and the Pledge, requires that the data centers pay the costs they are causing, prevent price hikes due to data center energy and infrastructure requirements, and lower electricity costs for consumers in the long run. PJM's most recent "view" of the RBP—a centrally cleared auction where PJM assumes the counterparty risk and assigns the costs to the zones in its footprint and then implores the states to "figure it out" as a matter of retail cost allocation between now and September—does not satisfy this principle. It fundamentally fails to link the need for new capacity to the extraordinary demand resulting from AI and data center growth. Instead, PJM should adopt the Joint Consumer Advocates' proposed RBP design set forth in its March 11 proposal.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A

Question 4	
Company Name	**Provide any feedback on the goals and principles for designing the Reliability Backstop process.**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	design should guard against the potential of market participants arbitraging between the BRA and Back stop auction...
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	The Goals and Principles are well stated.
1. Chesapeake Transmission LLC	At the February 25 workshop PJM confirmed that the load forecast does not map to specific data centers, and that granularity is zonal. Because of this it is not practicable to include forecasted data center load in the Base Residual Auction (BRA) when there is a Reliability Backstop Procurement. To illustrate this, if forecasted data center load in the 2028-29 BRA is 13 GWs, and the total cleared quantity is 6 GWs short of the Reliability Requirement, that means forecasted data center load represents 7 GWs of the total cleared quantity. There is no way for that 7 GWs to be allocated to individual data centers because the load forecast does not map to specific data centers, no specific data centers will have participated in the BRA, and none will have agreed to pay for an allocation of capacity. Yet each data center would need to know what portion of the 7 GWs is allocated to it in order to know what net amount to seek to procure in the Reliability Backstop Procurement. There is no apparent solution to this problem other than the exclusion of forecasted data center load from the BRA, so that data centers would know the amount to seek to procure in the Reliability Backstop Procurement. This solution also appears to be the only approach that is consistent with the "Ratepayer Protection Pledge" signed by seven major data center developers as announced by the White House on March 4th, https://www.whitehouse.gov/articles/2026/03/ratepayer-protection-pledge/, with extensive reporting here, https://www.powermag.com/hyperscalers-sign-white-house-pledge-to-fund-data-center-power-grid-upgrades/. Per the pledge: "Companies will build, bring, or buy the new generation resources and electricity needed to satisfy their new energy demands, paying the full cost of those resources whether by building, or buying from, new or otherwise additive power plants." If, instead, forecasted data center load is included in the BRA, then the vast majority of that load that clears, 7 GWs in the above example, would be supplied by existing resources rather than new resources, in violation of the pledge, and would raise consumers' capacity costs by billions of dollars. A last note: The planning parameters to be posted on March 22nd should include the above solution as an alternative so it could be implemented if adopted. Thank you for considering these comments.
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	RBP needs to include uprates, repowerings and reactivations. RBP should also include new capacity starting with the 2027/28 DY (which is already short 6,600 MW)

1. Chesapeake Climate Action Network	While many are suggesting PJM run a limited, one time only RBA, we believe that PJM should take bold action now to resolve structural resource adequacy problems. A band-aid procurement will likely be outstripped by load growth even before the auction clears, fail to protect the public, and does little to address the many problems delaying new entry. These comments support a more comprehensive approach, where an ongoing RBA is structured to help resolve new entry barriers, give states and utilities tools to take responsibility for resource adequacy, and fully protect the public from the price impacts of new large loads. Satisifying the White House/Governors' principles to protect residential customers require several features in the RBA: The auction should be between willing buyers and sellers only. No costs or risk can be passed on to the pool. Connect-and-manage load should be removed from the BRA. With this auction in place to provide a clear new entry price signal, the rationale for keeping connect-and-manage load in the BRA disappears. If connect and manage load stays in the BRA, consumers' bills will continue to increase because of data centers. Market Participants not associated with large load should be able to buy capacity to meet anticipated needs. This is needed to prevent capacity prices from staying high indefinitely as new data centers consume all available new capacity. The RBA will only be successful if it brings on genuinely new supply. The RBA must be designed to address the problems that are inhibiting new entry, including post-queue delays. To promote this: The RBA should integrate with queue cycles to avoid participation by speculative projects. Commitments to deliver capacity by a specified date should be strict and the penalties for non-delivery high. This ensures developers offer responsibility and provides ample incentive to overcome siting and permitting challenges. Any participation by 'avoided retirements creates an incentive for existing generation to claim it is planning to retire. That pushes out genuinely new capacity and reduces supply for native load. If avoided retirements are allowed, they will require strict oversight. The auction should be open to any technology or size of new supply without restriction.
1. Ceres	These comments support a more comprehensive approach, where an ongoing RBA is structured to help resolve new entry barriers, give states and utilities tools to take responsibility for resource adequacy, and fully protect the public from the price impacts of new large loads. Satisifying the White House/Governors' principles to protect residential customers require several features in the RBA: * The auction should be between willing buyers and sellers only. No costs or risk can be passed on to the pool. * Connect-and-manage load should be removed from the BRA. With this auction in place to provide a clear new entry price signal, the rationale for keeping connect-and-manage load in the BRA disappears. If connect and manage load stays in the BRA, consumers' bills will continue to increase because of data centers. * Market Participants not associated with large load should be able to buy capacity to meet anticipated needs. This is needed to prevent capacity prices from staying high indefinitely as new data centers consume all available new capacity. The RBA will only be successful if it brings on genuinely new supply. The RBA must be designed to address the problems that are inhibiting new entry, including post-queue delays. To promote this: * The RBA should integrate with queue cycles to avoid participation by speculative projects. * Commitments to deliver capacity by a specified date should be strict and the penalties for non-delivery high. This ensures developers offer responsibility and provides ample incentive to overcome siting and permitting challenges. * Any participation by 'avoided retirements creates an incentive for existing generation to claim it is planning to retire. That pushes out genuinely new capacity and reduces supply for native load. If avoided retirements are allowed, they will require strict oversight. * The auction should be open to any technology or size of new supply without restriction.
1. Third Act Maryland	Third Act MD believes that PJM should take action now to resolve structural resource adequacy problems rather than running a one-time RBA. The RBA needs to bring on genuinely new supply, and should be designed to address the problems that are inhibiting new entry, including post-queue delays. To promote this: Commitments to deliver capacity by a specified date should be strict and the penalties for non-delivery high. This ensures developers act responsibly, for example by working to overcome siting and permitting challenges. The auction should be open to any technology or size of new supply without restriction.

1. Calibrant Energy	Calibrant previously responded to the survey regarding the Feb 6 workshop, but provides the following commentary on the PJM presentation from March 5. Calibrant Feedback on Slides 3-4 There was broad stakeholder agreement that all capacity resources, including BTM capacity (e.g. DR/DER), should be included in the Reliability Backstop process. There were 27 entities that said it should be included, and only three that said it should not. 90% represents broad stakeholder agreement and not a core area of disagreement. The 27 that said it should represents a broad representation of stakeholders, including: • States (PA Governor's Office and NJ BPU) • Hyperscalers (Google) • LSEs/Suppliers (Constellation, NRG, Blue Ridge Power Agency) • Environmental (NRDC, Sierra Club) • Consumer Advocates (IL CUB, PA Office of Consumer Advocates) • Generators/Other Suppliers (AlphaGen, Calibrant, Convergent, Distributed Sun, Dominion Energy Generation, Earthrise, EmeraldAI, Enerwise, Mainspring Energy, MN8 Energy, Nous, PN Associates, truCurrent, Verrus, Vistra, Voltus) • Trade Associations (Advanced Energy United, American Clean Power Association, MAREC) Calibrant Feedback on Slide 6 Calibrant notes that stakeholders raised the risks of "Stranded costs if load does not materialize" and "Interconnection timing uncertainty." Behind-the-meter capacity is the best positioned of any resource type to mitigate those risks. Stranded costs for new generation and transmission becomes a moot point with BTM capacity, since if the load never materialized, neither does the generation, and no transmission is needed. And BTM capacity that does not export will interconnect faster than front-of-the-meter resources that inject to the grid. These are additional reasons for PJM to allow BTM capacity to participate, either through PRD as proposed during the CIFP process, or through the existing DR/DER options.
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Duke Energy wants to ensure that PJM allows all of the costs for the reliability backstop auction to be assigned to the entities that required the purchases.
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	Constellation supports the goals and principles articulated by PJM in slides 3-8 of its February 6 presentation. Constellation agrees that the current reliability challenge is a "transition gap." As articulated in PJM's 2027/2028 Base Residual Auction Reserve Target Shortfall Report, this gap is driven not by a failure of the market but "a confluence between an unprecedented surge in data center load ... [and] further exacerbated by the deactivation of legacy thermal assets, which depleted the region's historical capacity surplus precisely before the onset of the current demand growth." Given the transitional nature of the challenge, and the well-documented benefits that competitive markets bring to PJM ratepayers, Constellation agrees that any solution should be, as noted on slide 6 of the February 6 presentation, a "transitional process." This means that any process must have a "a viable off-ramp" that gives PJM "a clear ability to transition out of this mechanism." In other words, PJM should pursue solutions that minimize the impact on the existing market and return PJM to fully functioning competitive markets as quickly as possible. Constellation also agrees with PJM's statement on slide 6 of the February 6 presentation that preventing the premature retirement of existing resources through the preservation of market fundamentals is a foundational goal of this effort. PJM and stakeholders must focus on adding additional megawatts to the system while also retaining those megawatts that are already online. Simply put, adding new resources while existing resources retire (or leave the PJM market) will not solve the reliability challenge, and policies that favor new resources over existing resources are not viable solutions. This is not just an issue of fairness, but integral to ensuring long-term reliability and preventing a wave of departures by existing resources that could again result in a PJM system reliability gap. Because resources that participate in the backstop auction could enjoy revenue certainty for a period of up to 15 years, it is important those resources do not artificially depress prices for other resources in subsequent BRAs and send a signal for the premature retirement of existing resources (or their exit from the PJM market). Such an outcome could result in ratepayers facing the prospect of a second wave of costly procurements of new resources with long-term, guaranteed revenue. Therefore, Constellation believes that the inclusion of price mitigation in any backstop mechanism is necessary. The mitigator could take the shape of either (1) an auction floor similar to what PJM has proposed for the next two BRAs or (2) proxy price based on the cleared RBA offer, Net CONE, or another value. In the Stakeholder Survey Summary presented on March 5 the same issue was raised and PJM highlighted that stakeholders share a consensus view of "High sensitivity to market distortion and long-term credibility" and that "Final proposals will need to clearly demonstrate: Minimal distortion to PJM's capacity market." PJM also noted on slide 6 of the survey presentation that among the risks raised by stakeholders was the market risk of potential price suppression in the BRA. Constellation shares the same concern regarding the need to maintain market integrity to ensure long-term reliability. Finally, Constellation agrees with many of PJM's Firm Design Components on slide 8 of the March 5 presentation. Like PJM, Constellation believes that the RBA/RBP should be a one-time procurement, executed in September, with terms of up to 15 years. And while the proposal Constellation has put forward with the Joint Stakeholders does not specifically address the issue of cost allocation

	(outside of ensuring that loads that bilaterally contract for their capacity needs are exempt from the costs of the backstop auction), we are open to cost allocation methodologies that align with the Statement of Principles offered by the NEDC and PJM Governors and believe our proposal is compatible with various cost allocation methodologies stakeholders and/or FERC consider. One final note, as noted on slide 8 of the February 6 presentation, in order to accomplish this goal, PJM must select a "clear and transparent" backstop auction process that is "as simple and narrow as possible" and ensures "bidders have clear understanding of performance expectations." Essential to meeting those goals, the backstop auction should be keyed off the existing capacity market, with procurement targets based on the difference between the Reliability Requirement and what is procured in the BRA. Although PJM has made improvements to its inclusion of large loads in the load forecast, more work must be completed, and Constellation has shared our thoughts in that workstream. The product procured should be the existing capacity product which is well known and understood by both suppliers and load, with the same Capacity Performance expectations and penalties for failure to perform. PJM, stakeholders, FERC, and prospective participants have a lot of work ahead of them if a September deadline is to be realized; adding additional and unnecessary complexity to a procurement mechanism raises the risk that either the September deadline won't be met or that the auction won't be successful, or both.
1. Duquesne Light Company	N/A
1. Public Service Electric and Gas Company	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026 and the following: To achieve successful and actionable results, the entities that are allocated costs from the backstop need to have a clear understanding of what PJM is procuring for the power pool on their behalf. If PJM acts as both the administrator and the counterparty, PJM should consider developing a cost allocation methodology that utilizes a measure of net short position that takes into account an LSE's new large load additions and new capacity. If PJM decides to use a cost allocation method that does not dynamically reallocate costs each year based on each LSE's net-short position annually, then PJM should consider giving transferrable credits to the entities that are assigned the costs of the backstop procurement. The credits could expire once the term of the generation contract ends. The credits owned by an LSE could be counted towards the LSE's capacity obligation. Such a mechanism aligns with market principles and will afford LSEs that become less net short during the backstop term to sell their credits to other entities with load obligations.
1. PA House of Representatives, District 155	As the stakeholder process continues, I urge PJM to develop a Reliability Backstop Procurement and related market changes that protect ratepayers, ensure new supply is built after clearing the interconnection queue, and remove large new data center loads from the Base Residual Auction until they bring their own capacity.
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.
1. CP Energy Marketing (US) Inc.	Capital Power generally supports PJM's stated goals and principles for a Reliability Backstop, particularly the focus on maintaining grid reliability, providing revenue certainty to incentivize new supply, and accelerating interconnection where possible. We strongly agree that the backstop should be explicitly designed as a transitional mechanism, with a clear off ramp back to market based solutions, and with safeguards to prevent premature retirement of existing resources. To be effective, these goals should be paired with clear guardrails that limit scope, preserve market integrity, and avoid unnecessary bifurcation between backstop resources and the RPM.

1. PJM State Legislators	1. Ratepayers must be fully protected: The costs and risks associated with building new supply for data centers must not be shifted onto the public. This includes both direct costs and the price effects of tighter markets. If PJM procures capacity to address regional shortfalls, cost allocation must ensure that the entities driving the demand for new supply bear the associated financial risk—even if buyers default or fail to materialize. PJM should not act as the financial counterparty in any way that could make non-participating ratepayers liable for costs. Risks must remain with buyers rather than the broader PJM footprint. PJM's market designs must also support state actions to protect ratepayers. Many state regulators are examining ways to reduce prices and maintain reliability. PJM must work with states as they develop new regulations and laws to ensure that the Reliability Backstop Auction, and RPM generally, work seamlessly with efforts to attract new resources and manage demand. 2. Auction timing must support real project development: The backstop auction should be structured so that new supply can actually be built. Holding the auction in December 2026, aligned with the final decision point for Transition Cycle 2, would allow projects emerging from the queue to participate with a clear understanding of interconnection costs and timelines. A September auction would likely attract speculative projects that have not yet resolved these issues. 3. The auction must prioritize truly new supply: The purpose of the backstop mechanism is to encourage new capacity entry. Allowing "avoided retirements" to qualify could undermine that goal and lock in aging and expensive generation under long-term contracts. Eligibility should therefore be limited to new UCAP that has not previously participated in the Base Residual Auction, including new generation, uprates, imports, and demand response, with strong oversight from the Market Monitor to ensure capacity offered is genuinely incremental and only maintained as long as absolutely necessary. PJM must also ensure that new load procured through the backstop auction participates in the Base Residual Auction for the benefit of all ratepayers and to ensure that new supply serves the entire PJM footprint. 4. Large data center loads should be excluded from the Base Residual Auction until they add new supply: If the Reliability Backstop Auction provides the price signal for new entry, there is no reason for new data center loads to remain in the same capacity pool as organic load. Keeping these loads in the BRA would continue to inflate prices for residential customers even though the price signal for new entry is found elsewhere. It will also make it more difficult for data center customers to make informed commercial decisions about how much new supply to procure. Removing data centers that do not bring new supply from the BRA will allow procurement decisions for organic load growth—such as population increases, electrification, and electric vehicles—to deliver meaningful price relief for ratepayers. As this process evolves, PJM must also ensure that reliability and cost allocation can be directed to load-serving areas that align with state boundaries. PJM control zones often span multiple states—for example, the Allegheny Power (AP) zone, which includes portions of Pennsylvania, West Virginia, Maryland, and Virginia. Market structures should therefore allow costs and obligations to be attributed to the state-specific portions of these zones so that states can implement policies within their jurisdiction. Given the extraordinary pace of load growth, the Reliability Backstop Procurement could become one of the most consequential multi-billion-dollar auctions in PJM's history. Its design must protect ratepayers, work with interconnection queue timing, and prevent the costs of private data center expansion from being imposed on the public. We stand ready to work constructively with PJM, the Governors' Collaborative, and other ratepayer advocates to ensure that the interests of the 67 million retail customers in the PJM region are protected. We appreciate your consideration and would welcome the opportunity to discuss these principles with you. We also welcome further discussion on any other issues where PJM believes state legislators could assist new entry or resource adequacy.
1. Voltus, Inc.	N/A -- We will provide a further update to our feedback in a further submission of the survey. This response focuses on stakeholder process feedback.
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	The State of Maryland urges PJM to design the Reliability Backstop process in accordance with the bipartisan joint Statement of Principles from the 13 PJM State Governors and White House. The state-federal Statement of Principles is clear that Reliability Backstop Auction costs should be allocated to Load Serving Entities (LSEs) with new large load customers that have not self-procured new capacity or agreed to be curtailable.
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	PPL reiterates its prior comments on this question. Additionally, regarding PJM's current thinking on the Procurement Model as reflected on slide 9 of its presentation from the March 5 meeting, why is PJM proposing to allocate costs to the zone/TO/EDC where the load is located as opposed to allocating costs on an LSE-by-LSE basis as envisioned by the White House/Governors Principles? In a restructured state with many LSEs procuring power for customers, has PJM considered how an EDC would pass these costs to other LSEs let alone ensure that wholesale procurement costs go to the correct LSE? Is PJM assuming that zone/TO/EDC are all the same entity? PPL questions PJM's use of TO on slide 9 of its March 5 presentation. When considering a backstop procurement framework, it is important to keep this concept separate from the existing transmission planning process used to determine and address network upgrade needs and solutions. Regarding PJM's statement that coordination with EDCs will be necessary to determining who the right buyers in a Reliability Backstop procurement will be, we suggest that deeper conversations between PJM and EDCs occur prior to PJM landing on a process would be productive to ensure EDCs are not put in a position of violating state-based customer data confidentiality requirements or agreements with large load customers.

Question 5	
Company Name	**Are there additional impacts, or feedback on identified impacts of a Reliability Backstop?**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	I don't understand how auction will clear...will auction clear if gen offers are all higher than load bids?
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	My concern is that the RBA is not capable of protecting non-LLA retail load from being left "holding the bag" so to speak. The RBA should be held only for LLAs who agree to participate and post the necessary credit. Failure for the RBA to take place is an option.
1. Chesapeake Transmission LLC	Please see prior response.
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	RBP needs to include uprates, repowerings and reactivations. RBP should also include new capacity starting with the 2027/28 DY (which is already short 6,600 MW)
1. Chesapeake Climate Action Network	Resources that clear that RBA should not be given a queue fast track. Instead, the backstop should integrate with queue cycles. The most reasonable time to hold backstop auctions is during the Decision Point III phase of each queue cycle, after applicants have a GIA but before the GIA signing deadline. This will allow sellers to form bids based on accurate price information, including the full cost of interconnection, and provide a price signal to aid decisions to move forward with a GIA or not
1. Ceres	Resources that clear that RBA should not be given a queue fast track. Instead, the backstop should integrate with queue cycles. The most reasonable time to hold backstop auctions is during the Decision Point III phase of each queue cycle, after applicants have a GIA but before the GIA signing deadline. This will allow sellers to form bids based on accurate price information, including the full cost of interconnection, and provide a price signal to aid decisions to move forward with a GIA or not.
1. Third Act Maryland	NA
1. Calibrant Energy	Calibrant feedback on March 6 presentation Calibrant Feedback on Slide 8 Calibrant recommends targeting procurements earlier than 2030. As soon as new resources can come online, they should be eligible to serve load in the RBP. New resources for the RBP would not be required to come online by 2028 or 2029, but they should be incented to come online by then. If they came online in 2030 or after, they could still be eligible. It's unclear why PJM would neglect the opportunity to move new large loads into the RBP process until 2030 (and drive up capacity prices in the interim) if there are resources available before then. Also, NRDC and MN8 both made compelling arguments for conducting the procurement toward the end of 2026. If the objective is to maximize the number of MW of new resources that can come online in the near-term, it seems that waiting three months and having more mature resources participate that have a higher likelihood of coming online would be consistent with that objective.
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Unsure

1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	Constellation is concerned that the use of a multi-stage auction with an extended window, as first articulated in PJM's February 18 working paper, is both unnecessarily complex and could result in significant disruption of the existing BRAs. For example, an auction window that opens in September but closes shortly before the 2029/30 BRA (and before the results are known) could undermine the integrity of that auction as neither PJM nor market participants will have a clear understanding of the amount of capacity that needs to be procured or the appropriate price for that capacity. In other words, the price signals which are critical to the market will be significantly compromised. A second stage auction window that extends through the first half of 2027 will impact not only the 2029/30 BRA but also the 2030/31 BRA – the exact auction PJM and stakeholders have targeted for a return to the traditional three-year forward posture for the markets. To be certain, Constellation agrees with PJM that the existing BRA schedule should be maintained; further significant delays to the BRA will only exacerbate the reliability challenge. However, to preserve the integrity of the BRAs the backstop auction must complement rather than compete with the existing auction schedule. Holding dualling auction windows, as discussed in PJM's February 18 working paper, appears inconsistent with that goal. Additionally, while many of the items in both the Board's CIFP letter and the NEDC/PJM Governors' Statement of Principles will be considered in separate stakeholder workstreams, it is critical that PJM consider the interactions and impacts that each of these items will have on each other and with the goal of a transitional process that supports the long-term market.
1. Duquesne Light Company	N/A
1. Public Service Electric and Gas Company	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026
1. PA House of Representatives, District 155	1. Ratepayers must be fully protected: The costs and risks associated with building new supply for data centers must not be shifted onto the public. 2. Auction timing must support real project development: The backstop auction should be structured so that new supply can actually be built. 3. The auction must prioritize truly new supply: The purpose of the backstop mechanism is to encourage new capacity entry. Allowing "avoided retirements" to qualify could undermine that goal and lock in aging and expensive generation under long-term contracts. Eligibility should therefore be limited to new UCAP that has not previously participated in the Base Residual Auction, including new generation, uprates, imports, and demand response, with strong oversight from the Market Monitor to ensure capacity offered is genuinely incremental and only maintained as long as absolutely necessary. PJM must also ensure that new load procured through the backstop auction participates in the Base Residual Auction for the benefit of all ratepayers and to ensure that new supply serves the entire PJM footprint. 4. Large data center loads should be excluded from the Base Residual Auction until they add new supply: If the Reliability Backstop Auction provides the price signal for new entry, there is no reason for new data center loads to remain in the same capacity pool as organic load. 5. PJM must also ensure that reliability and cost allocation can be directed to load-serving areas that align with state boundaries. PJM control zones often span multiple states—for example, the Allegheny Power (AP) zone, which includes portions of Pennsylvania, West Virginia, Maryland, and Virginia. Market structures should therefore allow costs and obligations to be attributed to the state-specific portions of these zones so that states can implement policies within their jurisdiction.
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.
1. CP Energy Marketing (US) Inc.	Capital Power agrees that the Reliability Backstop will have meaningful interactions with RPM auctions, the interconnection queue, co located load policy, and credit and collateral requirements, all of which must be addressed holistically. In particular, unresolved questions around cost allocation, counterparty credit risk, and non performance risk are central to whether the backstop is financeable and fair. We also believe PJM should explicitly consider the potential for market distortion or price suppression impacts on existing merchant resources and incorporate protections to ensure that risks created by incremental load growth are not shifted to non causing customers. The board should also consider impacts on gas infrastructure and gas supply to prevent cost and reliability issues.
1. PJM State Legislators	X
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A

1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	PPL reiterates its prior survey comments to this question. We continue to believe that any framework adopted by PJM must recognize that not all LSEs are similarly situated and that implementation of an adopted framework must be feasible in both vertically-integrated and restructured states. The more certainty a framework adopted by PJM can provide related to the who, what and how much of a backstop procurement will facilitate effective allocation of cost to retail data center customers under state law. We also continue to have many questions related to how PJM will determine whether individual LSEs within the same zone/LDA are short for purpose of allocating any remaining costs.

Question 6	
Company Name	**How far forward (in delivery years) should the Backstop look to address?**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	1 year at a time
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	It looks like PJM may need 2 or 3 years in order to get sufficient numbers. The results should be assigned pro-rata to LLAs that agree to participate.
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	15 years
1. Chesapeake Climate Action Network	Procurement targets should be set by willing buyers, not by PJM. That said, buyers should include those who wish to procure for all load growth, not just large load growth. The auction should cover a period out to roughly current year + 15. But, both buyers and sellers should be able to make offers/bids that do not cover the entire period.
1. Ceres	Procurement targets should be set by willing buyers, not by PJM. That said, buyers should include those who wish to procure for all load growth, not just large load growth.
1. Third Act Maryland	The auction should cover a period of roughly current year + 15. Both buyers and sellers should be able to make offers/bids that do not cover the entire period.
1. Calibrant Energy	Calibrant Feedback on March 6 Presentation Calibrant Feedback on Slide 10 PJM asks “Should PJM target supply that can be online by a certain delivery year (2029 or 2030) or extend the online date out further to attract additional new supply?” Calibrant asserts this is a false choice. Per our feedback above, PJM should allow resources to participate through the RBP as soon as possible, and allow for supply to serve new large loads in 2028 or 2029. However, resources that cannot come online until 2030 should be allowed to participate. This aligns well with the increase in load that is expected from 2029 to 2030. PJM asks “What about Demand Response, Distributed Energy Resources, CIR Transfers and Surplus?” Consistent with our presentation on Feb 24, we strongly recommend that DR and DER be eligible to participate.
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Unsure

1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	In order to avoid over-procurement which could negatively impact the market and burden ratepayers with stranded costs, a backstop auction should only procure the known reliability gap. This means that the backstop auction should be keyed to the results of the most recent BRA; in the case of a September backstop auction this would be the 2028/29 BRA currently scheduled for June 2026. Constellation is concerned that in the Firm Design Components in PJM's March 5 presentation include near-term resource procurement through "possibly 2030." Furthermore, PJM's approach, as discussed in the workshop, appears to rely on the 2026 load forecast which does not include the enhancements directed by the PJM Board as part of the CIFP process. It is also unclear how PJM would evaluate potential LSE-driven requests to its load forecast. As discussed extensively in the workshops, the potential credit and collateral risks associated with over-procurement create a real threat to the market and the ability of PJM members and ultimately ratepayers to cover the costs associated with loads that do not materialize or default. These risks are significantly more existential than the risk of under-procurement, which can be addressed through the holistic market reforms PJM is contemplating. Constellation urges PJM to follow the directive of the NEDC/PJM Governors' Statement of Principles and only procure for "real and verifiable demand" and "only include large new loads in the forecast that can demonstrate a meaningful and verifiable commitment."
1. Duquesne Light Company	PJM should create targets to meet the needs up to 2030.
1. Public Service Electric and Gas Company	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026 and the following: PJM should base its procurement target on data center loads and related required reserves that either did not bring their own new generation or have a vertically integrated utility or FRR entity build generation to serve the data center load. This method effectively assesses procurement targets based on the aggregate net short Large Load position of entities with load obligations that submitted Large Load Adjustments to PJM. This method is adequate for the backstop as it accurately captures the reality that the majority of new load growth in PJM is currently associated with data centers.
1. PA House of Representatives, District 155	N/A
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.
1. CP Energy Marketing (US) Inc.	Capital Power supports a forward looking backstop that addresses incremental reliability needs across the delivery years in which verified load growth creates a demonstrable net short, rather than limiting procurement to a single delivery year. The backstop should be scoped to future obligations that cannot be met by existing or planned RPM committed resources, recognizing that incremental needs may span multiple delivery years. This approach preserves the backstop's role as a one time, transitional intervention while aligning procurement with realistic development timelines.
1. PJM State Legislators	Auction timing must support real project development: The backstop auction should be structured so that new supply can actually be built. Holding the auction in December 2026, aligned with the final decision point for Transition Cycle 2, would allow projects emerging from the queue to participate with a clear understanding of interconnection costs and timelines. A September auction would likely attract speculative projects that have not yet resolved these issues.
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	PPL reiterates its prior comments to this question

Question 7	
Company Name	**How should the procurement targets be calculated and what party should be setting the targets?**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	target should be load plus reserve requirement ...current methodology
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	The procurement targets should be based strictly on explicit LLA participation including the ability to post credit or otherwise guarantee performance.
1. Chesapeake Transmission LLC	Please see the response re Goals and Principles.
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	PJM and based on firm buy bids
1. Chesapeake Climate Action Network	Simply as the sum of buy bids.
1. Ceres	Simply as the sum of buy bids.
1. Third Act Maryland	Procurement targets should be set by willing buyers, not by PJM. That said, buyers should include those who wish to procure for all load growth, not just large load growth.
1. Calibrant Energy	See Feb 13 responses
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Unsure
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	The procurement target should be the difference between 100% of the Reliability Requirement for the 2028/29 BRA and the actual cleared capacity. This target can be easily and transparently calculated by PJM. Given the lack of clarity around future demand and the ongoing load forecast reforms, it is important that PJM avoid procurement targets that rely on speculative data and that could result in over-procurement.
1. Duquesne Light Company	PJM should set the targets and own the forecast. Input from TOs and EDCs on large load should be considered and incorporated where appropriate. An opportunity for large loads to opt in should be provided.
1. Public Service Electric and Gas Company	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026
1. PA House of Representatives, District 155	N/A
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.

1. CP Energy Marketing (US) Inc.	Procurement targets should be calculated and set by PJM based on a transparent determination of the aggregate incremental net short, consistent with the EKPC framework. This calculation should reflect verified incremental large load growth and incremental native load growth, net of existing RPM committed resources and any credible forward actions already undertaken by LSEs, such as self builds, bilateral contracts, or demand response. PJM is best positioned to centrally establish this target to ensure consistency and credibility, while explicitly limiting the target to incremental needs so the backstop does not duplicate or displace planned market based procurement.
1. PJM State Legislators	The auction must prioritize truly new supply: The purpose of the backstop mechanism is to encourage new capacity entry. Allowing "avoided retirements" to qualify could undermine that goal and lock in aging and expensive generation under long-term contracts. Eligibility should therefore be limited to new UCAP that has not previously participated in the Base Residual Auction, including new generation, uprates, imports, and demand response, with strong oversight from the Market Monitor to ensure capacity offered is genuinely incremental and only maintained as long as absolutely necessary. PJM must also ensure that new load procured through the backstop auction participates in the Base Residual Auction for the benefit of all ratepayers and to ensure that new supply serves the entire PJM footprint.
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	In addition to the prior comments provided by PPL to this question, has PJM considered how the large load addition request process will affect the inputs or cost assignment for the Reliability Backstop Procurement? For example, if PJM declines to include all or a portion of an EDCs large load addition request (considered firm by the EDC) for a forecast period covered by an RPM, will the portion of the load not included in the forecast be subject to a backstop procurement obligation? If so, is PJM concerned about the impacts of excluding EDC submitted load from the RPM forecast and then subjecting that same load to a backstop procurement with longer-term and potentially more expensive commitments? Would further discounting EDC large load addition requests result in BRA that does not include all Firm load additions push some load into "connect and manage" where it will be subject to curtailment prior to pre-emergency demand response?

Question 8	
Company Name	**Should the backstop procurement be limited to large load or should all load growth be considered?**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	all load
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	LLAs are driving the shortage. This should be the focus, and I would go so far as to retroactively assign previous LLA customers to the RBA.
1. Chesapeake Transmission LLC	Forecasted demand center load per response re Goals and Principles.
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	Large loads and the current short positions (from 2027/28 and 2028/29 BRAs) which were primarily caused by large loads
1. Chesapeake Climate Action Network	Both large loads and LSEs can purchase capacity in the RBA. LSEs that see possible capacity gaps can address load growth by buying capacity in the RBA, hopefully in coordination with their regulators. This reflects the increased responsibility for long-term resource planning that many states are now recognizing is necessary. This will also allow LSEs to buy capacity for all load growth, not just new large load growth.
1. Ceres	Both large loads and LSEs can purchase capacity in the RBA. LSEs that see possible capacity gaps can address load growth by buying capacity in the RBA, hopefully in coordination with their regulators. This reflects the increased responsibility for long-term resource planning that many states are now recognizing is necessary. This will also allow LSEs to buy capacity for all load growth, not just new large load growth.
1. Third Act Maryland	All load growth should be considered
1. Calibrant Energy	See Feb 13 responses
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Large Loads should be considered.
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	The procurement target should consider the difference between 100% of the entire RTO Reliability Requirement (i.e., all load) and the total capacity cleared (i.e., all supply). The amount of capacity procured should be calculated separately from the cost allocation of that procurement.
1. Duquesne Light Company	limited to large load
1. Public Service Electric and Gas Company	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026
1. PA House of Representatives, District 155	N/A
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.

1. CP Energy Marketing (US) Inc.	Capital Power believes that large loads should bear the full cost of the reliability impact they create, even though PJM may consider all incremental load growth when sizing the overall backstop requirement. Under the EKPC framework, PJM can calculate the procurement target based on the total incremental system shortfall, but cost responsibility is assigned first and entirely to the LSEs serving large load, with any remaining procurement only allocated to LSEs with verified incremental native load shortfalls. This approach protects residential and existing customers while ensuring the backstop addresses only the incremental need that drives the reliability concern.
1. PJM State Legislators	3. The auction must prioritize truly new supply: The purpose of the backstop mechanism is to encourage new capacity entry. Allowing "avoided retirements" to qualify could undermine that goal and lock in aging and expensive generation under long-term contracts. Eligibility should therefore be limited to new UCAP that has not previously participated in the Base Residual Auction, including new generation, uprates, imports, and demand response, with strong oversight from the Market Monitor to ensure capacity offered is genuinely incremental and only maintained as long as absolutely necessary. PJM must also ensure that new load procured through the backstop auction participates in the Base Residual Auction for the benefit of all ratepayers and to ensure that new supply serves the entire PJM footprint. 4. Large data center loads should be excluded from the Base Residual Auction until they add new supply: If the Reliability Backstop Auction provides the price signal for new entry, there is no reason for new data center loads to remain in the same capacity pool as organic load. Keeping these loads in the BRA would continue to inflate prices for residential customers even though the price signal for new entry is found elsewhere. It will also make it more difficult for data center customers to make informed commercial decisions about how much new supply to procure. Removing data centers that do not bring new supply from the BRA will allow procurement decisions for organic load growth—such as population increases, electrification, and electric vehicles—to deliver meaningful price relief for ratepayers.
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A

Question 9	
Company Name	**Please list any considerations for determining the Counterparty to the long-term contracts through the Reliability Backstop Procurement. (example: should this be the buyer (LSE) or PJM?)**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	risk of load bids and default should remain at lowest level possible...with hyperscaler or the LSE signing them up...
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	There has been a discussion that PJM would be the Central Counterparty. This would only be appropriate if the LLAs provided sufficient credit guarantees. PJM should not be procuring generation based solely on its load forecast without a financial commitment on the part of the end-use customers of the RBA.
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	PJM with firm, multi-year buy bids from LSEs and Large Loads
1. Chesapeake Climate Action Network	PJM should not take any actions that could result in risks being shifted to the public, rather than contained to the auction participants. To that end, PJM should not act as the financial counterparty in any way that could make non-participating ratepayers liable for costs, defaulted payments, or failure to show up. Instead, NRDC recommends PJM “pools” settlements to de-risk the auction while shielding the rest of the footprint from any default or cost risks. See NRDC slides 11-13 for more information.
1. Ceres	PJM should not take any actions that could result in risks being shifted to the public, rather than contained to the auction participants. To that end, PJM should not act as the financial counterparty in any way that could make non-participating ratepayers liable for costs, defaulted payments, or failure to show up. Instead, NRDC recommends PJM "pools" settlements to de-risk the auction while shielding the rest of the footprint from any default or cost risks.
1. Third Act Maryland	PJM should not take any actions that could result in risks being shifted to the public, rather than contained to the auction participants. To that end, PJM should not act as the financial counterparty in any way that could make non-participating ratepayers liable for costs, defaulted payments, or failure to show up.
1. Calibrant Energy	See Feb 13 responses
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Duke Energy believe that the actual entity that is purchasing the capacity should be the buyers in the auction
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	PJM should be the counterparty to the backstop auction. Because the product procured will be a Capacity Performance megawatt, PJM will be best positioned to ensure that the product meets Capacity Performance expectations and will be able to enforce any Capacity Performance penalties. PJM is also uniquely equipped to evaluate and enforce credit and collateral requirements.
1. Duquesne Light Company	bilateral contracts should be used with each party bearing the appropriate risk as a party to the contract
1. Public Service Electric and Gas Company	No response at this time

1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026
1. PA House of Representatives, District 155	If PJM procures capacity to address regional shortfalls, cost allocation must ensure that the entities driving the demand for new supply bear the associated financial risk—even if buyers default or fail to materialize. PJM should not act as the financial counterparty in any way that could make non-participating ratepayers liable for costs. Risks must remain with buyers rather than the broader PJM footprint.
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.
1. CP Energy Marketing (US) Inc.	In determining the appropriate counterparty, Capital Power believes PJM should prioritize structures that clearly assign credit, default, and performance risk to the parties creating the reliability need. Whether PJM or LSEs serve as the formal counterparty, the framework should avoid broad socialization of risk and instead allocate costs to short LSEs or zones driven by incremental load growth.
1. PJM State Legislators	X
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A

Question 10		
Company Name	**What criteria should be used to determine eligible supply for a Reliability Backstop Procurement? (Select all that apply.) - Selected Choice**	**What criteria should be used to determine eligible supply for a Reliability Backstop Procurement? (Select all that apply.) - Other - Text**
1. Campbell Energy Advisors, LLC	Surplus,Deferred Retirements,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER),Other	New Demand Response should be eligible. This DR could be derived from new BTMG on existing load sites as well as new curtailment. Co-Located loads using Firm Contract Demand should be eligible for Demand Response capacity for reductions below the PLC associated with the Firm Contract Demand
1. Red Oak Power, LLC	Uprates,Surplus,Deferred Retirements,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER),Other	as long as its dispatchable.
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	Uprates,Surplus,Deferred Retirements,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER),Other	PJM could allow for participation of these types of resources, but they would have to be optimized with new iron in the ground. DER is an excellent fit because small generation may be more available than large frame units designed to be connected to the grid.
1. Chesapeake Transmission LLC	Other	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	Other	
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	Uprates,Other	RBP needs to include uprates, repowerings and reactivations. RBP should also include new capacity starting with the 2027/28 DY (which is already short 6,600 MW)
1. Chesapeake Climate Action Network	Other	Deferred retirements only with strict eligibility requirements as outlined in the NRDC proposal, offer mitigation, and provisions to end the contract early if the resource is no longer needed.
1. Ceres	Uprates,Surplus,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER)	
1. Third Act Maryland	Uprates,Surplus,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER)	
1. Calibrant Energy	Uprates,Surplus,Deferred Retirements,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER),Other	
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Uprates,Demand Response,Distributed Energy Resources (DER),Other	New Demand Response and DER should be considered
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	Other	New generation, uprates, reactivated generation, existing generation with an offer cap above the top of the VRR curve, traditional demand response committing for more than a year.
1. Duquesne Light Company	Uprates	
1. Public Service Electric and Gas Company	Other	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	Other	Please see prior comments from 2/13/26.
1. PA House of Representatives, District 155	Other	The auction must prioritize truly new supply: The purpose of the backstop mechanism is to encourage new capacity entry. Allowing “avoided retirements” to qualify could undermine that goal and lock in aging and expensive generation under long-term contracts. Eligibility should therefore be limited to new UCAP that has not previously participated in the Base Residual Auction, including new generation, uprates, imports, and demand response, with strong oversight from the Market Monitor to ensure capacity offered is genuinely incremental and only maintained as long as absolutely necessary. PJM must also ensure that new load procured through the backstop auction participates in the Base Residual Auction for the benefit of all ratepayers and to ensure that new supply serves the entire PJM footprint.
1. Clean Energy Buyers Association (CEBA)	Other	Intentionally left blank. CEBA may provide further comments on this topic.
1. CP Energy Marketing (US) Inc.	Uprates,Surplus,Deferred Retirements,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER)	
1. PJM State Legislators	Uprates,Surplus,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER)	
1. Voltus, Inc.	Uprates,Surplus,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER)	
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	Uprates,Surplus,Deferred Retirements,Imports (pseudo ties),Demand Response,Distributed Energy Resources (DER),Other	Only truly new capacity resources of any type should be eligible for the Reliability Backstop. Maryland supports new DR and new DER capacity eligibility, subject to double counting protections. Deferred retirements could be included among the forms of incremental increases to new supply, provided safeguards against gaming behavior are in place, such as documentation of a deactivation notice prior to the 27/28 BRA.
1. Office of the Illinois Attorney General	Other	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	Other	

Question 11	
Company Name	**Please explain your position on term of contracts.**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	for new gen...let offering entity decide
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	I am agnostic to the term of the contracts.
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	Up to 15 years
1. Chesapeake Climate Action Network	We believe the most important aspect of contract term is flexibility on the start date. Resources that can be built quickly should be able to offer near-term capacity without excluding resources that are slower to build.
1. Ceres	Fairly open. We believe the most important aspect of contract term is flexibility on the start date. Resources that can be built quickly should be able to offer near-term capacity without excluding resources that are slower to build.
1. Third Act Maryland	NA
1. Calibrant Energy	See Feb 13 comments
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Duke Energy believe that up to 15 year terms are acceptable.
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	Constellation supports the Joint Stakeholder package which allows commitments for a period of up to 15 years. Resources willing to take shorter terms should be cleared first (i.e., resources with 5-year terms should clear before resources with 10-year terms, which should clear before resources with 15-year terms). This approach ensures adequate revenue certainty for resources that need it, while incenting selection of resources that need less time and helps transition back to market fundamentals as soon as possible.
1. Duquesne Light Company	up to 15 years
1. Public Service Electric and Gas Company	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026
1. PA House of Representatives, District 155	N/A
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.

1. CP Energy Marketing (US) Inc.	Capital Power supports providing sufficient contract length to enable financing of new and incremental capacity, but cautions against defaulting to the maximum allowable term absent strong safeguards. Long-term contracts should be clearly tied to the transitional nature of the backstop, include periodic review points, and avoid unduly disadvantaging existing merchant resources. A balanced approach to contract duration, combined with a defined sunset and transition back to market reforms, is essential to preserving long-term market integrity.
1. PJM State Legislators	X
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A

Question 12	
Company Name	**Are there willingness-to-pay considerations to resource selection? Please explain.**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	abstain
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	LLAs have to signal a willingness to pay through a real demand curve and not an artificial, administratively determined demand curve.
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	N/A
1. Chesapeake Climate Action Network	Buyers can express willingness-to-pay through their bid price. Supply resources that offer more than the highest buer is willing to pay won't be selected, ensuring efficient market outcomes.
1. Ceres	Buyers can express willingness-to-pay through their bid price. Supply resources that offer more than the highest buer is willing to pay won't be selected, ensuring efficient market outcomes.
1. Third Act Maryland	Buyers can express willingness-to-pay through their bid price. Supply resources that offer more than the highest buer is willing to pay won't be selected, ensuring efficient market outcomes.
1. Calibrant Energy	See Feb 13 comments
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Unsure
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	Constellation supports the Joint Stakeholder package which includes a single clearing price for both the 2028/29 BRA and a September backstop auction used to meet the 2028/29 reliability requirement if the BRA is short 98% of the reliability requirement.
1. Duquesne Light Company	N/A
1. Public Service Electric and Gas Company	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026
1. PA House of Representatives, District 155	N/A
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.
1. CP Energy Marketing (US) Inc.	N/A

1. PJM State Legislators	X
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A

Question 13	
Company Name	**How should the Reliability Backstop process take into account deliverability and necessary system upgrades?**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	offering entity should be able to build that into offer...let's see if load wants to pay
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	DER might be a better alternative for participation.
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	RBP should consider system upgrade costs and as a result should prioritize projects that have been through the interconnection process or are currently in the interconnection process (TC2 and earlier)
1. Chesapeake Climate Action Network	The RBA should respect deliverability in the same way as RPM, but should not create new constrained zones. Imports into constrained zones must be limited to retain enough import capacity for previously cleared RPM resources. System upgrades that are needed by resources clearing in the RBA could be considered in RTEP or funded through interconnection costs. However, the RBA should not be a way to transfer deliverability costs from new supply to load. Besides being unjustly discriminatory compared to how all other supply is treated, socializing network upgrade costs would risk selecting projects with uneconomically high network upgrade costs.
1. Ceres	create new constrained zones. Imports into constrained zones must be limited to retain enough import capacity for previously cleared RPM resources. System upgrades that are needed by resources clearing in the RBA could be considered in RTEP or funded through interconnection costs. However, the RBA should not be a way to transfer deliverability costs from new supply to load. Besides being unjustly discriminatory compared to how all other supply is treated, socializing network upgrade costs would risk selecting projects with uneconomically high network upgrade costs.
1. Third Act Maryland	NA
1. Calibrant Energy	See Feb 13 comments
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	I believe that upgrade costs should be factored into the auction. Unsure how this will be incorporated into auctions
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	The responsibility for meeting a project's stated commercial operation date should rest with the project developer. Resources seeking to participate in the backstop auction for 2028/29 delivery year must meet the same requirements as those resources participating in the BRA for 2028/29 delivery year. Resources for future years (after 2028/29 delivery year) must meet qualification standards to verify that they are reasonably likely to perform in the delivery years for which they offer and clear. All resources should be subject to existing Capacity Performance expectations and subject to corresponding penalties should they not meet their intended COD. If a resource procured under the backstop auction is not available in a given delivery year (either due to delays in coming online or delays in the construction of network upgrades), it should not be counted in the RPM auctions for that delivery year.
1. Duquesne Light Company	interconnecting customers and generators should pay for all necessary upgrades

1. Public Service Electric and Gas Company	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026
1. PA House of Representatives, District 155	As this process evolves, PJM must also ensure that reliability and cost allocation can be directed to load-serving areas that align with state boundaries. PJM control zones often span multiple states—for example, the Allegheny Power (AP) zone, which includes portions of Pennsylvania, West Virginia, Maryland, and Virginia. Market structures should therefore allow costs and obligations to be attributed to the state-specific portions of these zones so that states can implement policies within their jurisdiction.
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.
1. CP Energy Marketing (US) Inc.	Deliverability and transmission upgrade requirements should be assessed as part of the resource selection process, not deferred until after procurement. Gas procurement constraints should also be considered. Capital Power supports integrating accelerated or targeted deliverability studies so bidders have credible cost and timing information, and so PJM can prioritize resources with lower system impacts where reliability value is comparable. Upgrade costs and delay risk should remain with the contracting parties and not be reallocated to other queued projects or customers.
1. PJM State Legislators	Ratepayers must be fully protected: The costs and risks associated with building new supply for data centers must not be shifted onto the public. This includes both direct costs and the price effects of tighter markets. If PJM procures capacity to address regional shortfalls, cost allocation must ensure that the entities driving the demand for new supply bear the associated financial risk—even if buyers default or fail to materialize. PJM should not act as the financial counterparty in any way that could make non-participating ratepayers liable for costs. Risks must remain with buyers rather than the broader PJM footprint.
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	A review of selected case studies of current and past Maryland energy projects indicates that projects with limited interconnection network upgrades can advance quickly, while those requiring major grid upgrades may see delays to their expected commercial operation timeline. The Reliability Backstop process should account for the complexity of system upgrades when assessing “shovel readiness” or time-to-construction.
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A

Question 14	
Company Name	**Should the backstop procurement be targeting September 2026? Please explain.**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	let's try
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	That seems like an arbitrary date given the complexities and the need to have LLAs sign up to participate and provide credit.
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	Yes for Phase 1
1. Chesapeake Climate Action Network	No. We believe that the best time is in December 2026, during the Decision Point III phase of Transition Cycle 2. This will allow new supply resources to bid in with their full interconnection cost and construction timeline information, rather than inviting speculative supply projects that could increase risk and costs.
1. Ceres	No. We believe that the best time is in December 2026, during the Decision Point III phase of Transition Cycle 2. This will allow new supply resources to bid in with their full interconnection cost and construction timeline information, rather than inviting speculative supply projects that could increase risk and costs.
1. Third Act Maryland	No. After discussion with other experts Third Act MD thinks that the best time is in December 2026, during the Decision Point III phase of Transition Cycle 2. This will allow new supply resources to bid in with their full interconnection cost and construction timeline information, rather than inviting speculative supply projects that could increase risk and costs.
1. Calibrant Energy	Per our earlier comments, we support the positions taken by MN8 and NRDC to have the procurement closer to the end of 2026 to allow for more project certainty
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	Unsure if can be completed by this time but urgency is needed.
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	The NEDC and PJM Governors' Statement of Principles requests a September 2026 commencement of a backstop auction. Additionally, given the shortfall in the 2027/28 BRA and potential shortfall in the 2028/29 BRA, Constellation believes that PJM and stakeholders should move forward as expeditiously as possible to a backstop auction. An auction framework that is based on the current RPM model, with procurement targets based on the results of the 2028/29 BRA, and procuring a Capacity Performance product, will allow for a backstop auction to be successfully conducted in September.
1. Duquesne Light Company	yes, if possible
1. Public Service Electric and Gas Company	No response at this time

1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	See previous comments submitted on 2/13/2026 and the following: PJM should align the timing of the RBP to the interconnection queue cycle. Developers who are aware of the network upgrade costs associated with a project are better positioned to engage in in-market bilateral transactions or to make an informed decision to participate in the procurement.
1. PA House of Representatives, District 155	N/A
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.
1. CP Energy Marketing (US) Inc.	Capital Power understands the policy and Board interest in targeting a September 2026 backstop procurement, but believes timing should be contingent on design readiness. Advancing a procurement without clear rules on eligibility, credit, deliverability, and cost allocation risks selecting speculative resources and undermining confidence in the process. If PJM proceeds on an accelerated timeline, it should do so with a narrowly scoped, well-defined design that can be implemented reliably and withstand regulatory scrutiny.
1. PJM State Legislators	Auction timing must support real project development: The backstop auction should be structured so that new supply can actually be built. Holding the auction in December 2026, aligned with the final decision point for Transition Cycle 2, would allow projects emerging from the queue to participate with a clear understanding of interconnection costs and timelines. A September auction would likely attract speculative projects that have not yet resolved these issues.
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	Yes, the Statement of Principles calls for a Reliability Backstop Auction to be held no later than September 2026.
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A

Question 15	
Company Name	**Are there other considerations to the timing of the backstop? Please explain.**
1. Campbell Energy Advisors, LLC	nc
1. Red Oak Power, LLC	if shortage is due to large load make them pay for all
1. DTE Atlantic, LLC 2. DTE Energy Trading, Inc.	Timing should be based on a reasonable expectation that the auction will succeed based on the design.
1. Chesapeake Transmission LLC	N/A
1. Brandon Shores LLC 2. Brunner Island, LLC 3. H.A. Wagner LLC 4. LMBE Project Company LLC 5. MC Project Company LLC 6. Montour, LLC 7. Susquehanna Nuclear, LLC 8. Talen Energy Marketing, LLC 9. Guernsey Power Station LLC 10. Moxie Freedom LLC	N/A
1. Brookfield Power Piney & Deep Creek LLC 2. Brookfield Renewable Energy Marketing US LLC 3. Brookfield Renewable Trading and Marketing LP 4. BIF II Safe Harbor Holdings, LLC 5. BIF III Holtwood LLC 6. Bishop Hill Energy LLC 7. Safe Harbor Water Power Corporation 8. TerraForm IWG Acquisition Holdings II, LLC 9. Hawks Nest Hydro LLC 10. BREG Aggregator LLC	Phase 2 could be later
1. Chesapeake Climate Action Network	A critical part of this auction is that the cleared supply is actually constructed. If the auction is held in September, much of the new supply offered will be highly speculative. Aligning auction timing with queue cycles should greatly improve the confidence in the projects selected.
1. Ceres	A critical part of this auction is that the cleared supply is actually constructed. If the auction is held in September, much of the new supply offered will be highly speculative. Aligning auction timing with queue cycles should greatly improve the confidence in the projects selected.
1. Third Act Maryland	A critical part of this auction is that the cleared supply is actually constructed. If the auction is held in September, it is likely that much of the new supply offered will be speculative. Aligning auction timing with queue cycles will help address this problem
1. Calibrant Energy	See Feb 13 comments
1. Duke Energy Business Services LLC 2. Duke Energy Carolinas, LLC 3. Duke Energy Florida, LLC 4. Duke Energy Kentucky, Inc. 5. Duke Energy Ohio, Inc. 6. Duke Energy Progress, LLC	none
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	The backstop auction should be timed to minimize the impact on the BRAs scheduled for June (2028/29 BRA) and December (2029/30 BRA) 2026.
1. Duquesne Light Company	N/A
1. Public Service Electric and Gas Company	No response at this time
1. Dominion Energy Generation Marketing, Inc. 2. Dominion Energy South Carolina, Inc. 3. Eastern Shore Solar LLC 4. Greensville County Solar Project, LLC 5. Hardin Solar Energy II LLC 6. Southampton Solar LLC 7. Summit Farms Solar, LLC 8. TWE Myrtle Solar Project, LLC 9. Virginia Electric & Power Company 10. Virginia Solar 2017 Projects LLC 11. Wilkinson Solar LLC	None

1. PA House of Representatives, District 155	The backstop auction should be structured so that new supply can actually be built. Holding the auction in December 2026, aligned with the final decision point for Transition Cycle 2, would allow projects emerging from the queue to participate with a clear understanding of interconnection costs and timelines. A September auction would likely attract speculative projects that have not yet resolved these issues.
1. Clean Energy Buyers Association (CEBA)	Intentionally left blank. CEBA may provide further comments on this topic.
1. CP Energy Marketing (US) Inc.	N/A
1. PJM State Legislators	Auction timing must support real project development: The backstop auction should be structured so that new supply can actually be built. Holding the auction in December 2026, aligned with the final decision point for Transition Cycle 2, would allow projects emerging from the queue to participate with a clear understanding of interconnection costs and timelines. A September auction would likely attract speculative projects that have not yet resolved these issues.
1. Voltus, Inc.	N/A
1. Maryland Energy Administration (on behalf of the Office of Governor Wes Moore)	N/A
1. Office of the Illinois Attorney General	Please see the Position of the Joint Consumer Advocates submitted on March 11, 2026.
1. Louisville Gas and Electric Company/Kentucky Utilities Company 2. PPL Electric Utilities Corporation d/b/a PPL Utilities	N/A