



## I. MOTION TO INTERVENE

On March 3, 2026, Blossom Solar filed a request for limited waiver of PJM’s Tariff with respect to the deadline to submit a binding notice of intent to offer a Planned Generation Capacity Resource for the Base Residual Auction associated with the 2028/2029 Delivery Year. As the administrator of the PJM Tariff, as well as the entity that administers the Reliability Pricing Model Auctions, PJM has an independent interest in this proceeding that no other party can adequately represent. Accordingly, PJM respectfully requests that the Commission grant this motion to intervene and that PJM be afforded all the rights of a party to this proceeding.<sup>3</sup>

## II. ANSWER

### A. *PJM Takes No Position on the Requested Waiver in This Specific Scenario.*

PJM’s Tariff provides, in relevant part, that “a Planned Generation Capacity Resource may be included in a Sell Offer for an RPM Auction only if the Capacity Market Seller of such resource provides a binding notice of intent . . . no later than (a) the immediately preceding December 1 for a Base Residual Auction.”<sup>4</sup> For the Base Residual Auction associated with the 2028/2029 Delivery Year, the deadline for Capacity Market Sellers of Planned Generation Capacity Resources to submit the notice of intent was December 1, 2025.<sup>5</sup> The purpose of requiring this binding notice of intent to offer Planned

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<sup>3</sup> 18 C.F.R. § 385.214.

<sup>4</sup> Tariff, Attachment DD, section 5.5.

<sup>5</sup> Although the specific language in Tariff, Attachment DD, section 5.5 establishes alternative deadlines for the binding notices of intent for the Base Residual Auctions covering the 2026/2027 and 2028/2029 delivery years, PJM obtained a waiver of its tariff to adjust the schedule for the BRAs for the 2026/2027 through 2029/2030 delivery years, including the deadline for the submission of a binding notice of intent. *See PJM Interconnection, L.L.C., Request for Waiver of PJM Interconnection, L.L.C., to Delay the Reliability Pricing Model Auctions Beginning with the December 2025 Base Residual Auction, Attachment A, Docket No. ER25-118-000 (Oct. 15, 2024); see also PJM Interconnection, L.L.C., 189 FERC ¶ 61,105 (2024).*

Generation Capacity Resources by this deadline is to provide “greater transparency to [M]arket [P]articipants . . . . It also provides some assurance that the mix of resources in PJM’s [Effective Load Carrying Capability] model will reflect what is cleared in any individual capacity auction.”<sup>6</sup> Thus, requiring Capacity Market Sellers to submit this binding notice of intent to offer by December 1, 2025, for the 2028/2029 Base Residual Auction was necessary to provide PJM with sufficient time to calculate the capacity accreditation values for each Capacity Resource that may be offered in the upcoming auction.

Here, while Blossom Solar submitted a binding notice of intent to offer into the 2027/2028 Base Residual Auction, it did not clear the auction because it was subject to the Minimum Offer Price Rule.<sup>7</sup> Blossom Solar did not become aware that it did not clear the 2027/2028 Base Residual Auction, and that therefore the underlying resource did not become an Existing Generation Capacity Resource, until after the December 1, 2025 deadline to submit a binding notice of intent to offer into the 2028/2029 Base Residual Auction.<sup>8</sup> As a result, Blossom Solar did not timely submit another binding notice of intent to offer for the 2028/2029 Base Residual Auction.

In this case, because Blossom Solar did not clear a prior RPM Auction, it is still considered a Planned Generation Capacity Resource. And because Blossom Solar did not submit a binding notice of intent to offer such Planned Generation Capacity Resource into the 2028/2029 Base Residual Auction, this resource was excluded from PJM’s planning

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<sup>6</sup> *PJM Interconnection, L.L.C.*, 186 FERC ¶ 61,080, at P 263 (2024).

<sup>7</sup> *Blossom Solar, LLC*, Petition of Blossom Solar, LLC for Limited, Prospective Waiver and Request for Expedited Action, Docket No. ER26-1602-000, at 7 (March 3, 2026).

<sup>8</sup> *Id.*

models used to develop the auction parameters for the upcoming 2028/2029 Base Residual Auction. As a result, given the requirement specified in Tariff, Attachment DD, section 5.5, PJM is unable to unilaterally allow Blossom Solar to be offered into the 2028/2029 Base Residual Auction absent waiver of the requirement that a Planned Generation Capacity Resource must be accompanied by a binding notice of intent in order to be included in a Sell Offer.

Notwithstanding the foregoing, PJM does not object to Blossom Solar’s waiver request in this limited instance. The original impetus for requiring a binding notice of intent to accompany any Planned Generation Capacity Resource that is to be offered in the RPM Auction is to allow for the development of accurate planning parameters. Specifically, binding notice of intent allows PJM to more accurately model the expected Capacity Emergency Transfer Objective and Capacity Emergency Transfer Limit, which, if incorrectly modeled can create a significant impact to the auction clearing prices when a large Planned Generation Capacity Resource in a constrained Locational Deliverability Area is not offered into the auction.<sup>9</sup>

Here, Blossom Solar is not a large Planned Generation Capacity Resource and will not be interconnected into a Locational Deliverability Area that is historically constrained. That is, Blossom Solar is interconnected into Morrow County, Ohio in the American Transmission Systems, Inc. (“ATSI”) Zone,<sup>10</sup> which is generally unconstrained<sup>11</sup> so the lack of an accompanying binding notice of intent for Blossom Solar would likely not make

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<sup>9</sup> See *PJM Interconnection, L.L.C.*, 182 FERC ¶ 61,109 (2023).

<sup>10</sup> *Id.* at 3.

<sup>11</sup> See PJM, 2027/2028 Planning Parameters for Base Residual Auction (Jan. 5, 2026), <https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2027-2028/2027-2028-planning-period-parameters-for-base-residual-auction.xlsx>.

an appreciable difference to the auction clearing results despite being excluded in the planning models. Additionally, the impact to the overall resource mix used in the Effective Load Carrying Capability model is *de minimus* given that Blossom Solar had an Accredited UCAP value of 6.0 MW for the 2027/2028 Delivery Year.<sup>12</sup>

***B. PJM Is Able to Accommodate the Participation of Blossom Solar in the 2028/2029 Base Residual Auction in the Event the Commission Grants the Requested Waiver.***

In the event the Commission grants Blossom Solar’s waiver request, PJM would not rerun the Effective Load Carrying Capability model as that could impact the Accredited UCAP for all Capacity Resources for the 2028/2029 Delivery Year. That is because PJM already posted the preliminary ELCC Class Rating values for the 2028/2029 Base Residual Auction on February 27, 2026 in accordance with the pre-auction schedule<sup>13</sup> and rerunning the entire Effective Load Carrying Capability model at this juncture could impact all other Capacity Resource’s Accredited UCAP in advance of the 2028/2029 Base Residual Auction. Instead, should the Commission grant the requested waiver, PJM would produce an Accredited UCAP value for Blossom Solar by comparing Blossom Solar’s putative output derived by PJM against the Class Average Output utilized in the Effective Load Carrying Capability run used for the 2028/2029 Base Residual Auction.<sup>14</sup> This would allow Blossom Solar to be offered in the 2028/2029 Base Residual Auction with such an

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<sup>12</sup> *Id.* at 11.

<sup>13</sup> PJM, *Manual 21B: PJM Rules and Procedures for Determination of Generating Capability*, § 3 (rev. 5, Jan. 22, 2026), <https://www.pjm.com/-/media/DotCom/documents/manuals/m21b.pdf> (“PJM Manual 21B”) (“Both the preliminary ELCC Class Rating values and preliminary ELCC Resource Performance Adjustment values will be posted and/or communicated as listed within the RPM auction schedule”); *see also* PJM, Auction Schedule for 28/29 BRA (2026), <https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/rpm-auction-schedule.xlsx>.

<sup>14</sup> PJM Manual 21B at §§ 4.2 and 9.

Accredited UCAP value in the event the Commission grants the underlying waiver request prior to the commencement of the 2028/2029 Base Residual Auction (i.e., prior to June 30, 2026).

### III. CONCLUSION

For the reasons provided herein, PJM does not object to Blossom Solar's request for a waiver of the binding notice of intent requirement in this limited scenario given the *de minimus* impact that Blossom Solar has on the overall resource mix used in the Effective Load Carrying Capability model and the fact that this resource is located in a generally unconstrained Zone. Administratively, PJM can accommodate Blossom Solar's participation in the 2028/2029 Base Residual Auction so long as the Commission issues an order granting the requested waiver prior to June 30, 2026.

Respectfully submitted,

/s/ Chenchao Lu

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**CERTIFICATE OF SERVICE**

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

Dated at Audubon, PA on this 24<sup>th</sup> day of March 2026.

/s/ Chenchao Lu

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