

Resource Class already includes Capacity Storage Resources “with the same specified characteristic duration of 4, 6, 8, and 10 hours.”³

The Petition seeks waiver of the August 1, 2025 RAA deadline to submit this request.⁴ As PJM has not begun ELCC model runs for the 2029/2030 BRA at this juncture, there would be no adverse procedural impacts should the Commission grant this waiver. Accordingly, PJM does not oppose this Petition as long as the Commission also grants waiver of the November 15 deadline by which PJM must provide a determination on any such ELCC Class change request, as discussed further below.⁵

I. MOTION TO INTERVENE

On March 27, 2026, Seneca filed a petition for limited waiver of RAA, Schedule 9, section B(5) with respect to the procedural deadline to request a change to their ELCC Class. PJM is the administrator of the RAA and Reliability Pricing Model (“RPM”). As the entity that reviews and makes determinations of ELCC Class change requests, PJM has an independent interest in this proceeding that no other party can represent adequately. 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.

³ See RAA, Article 1, Definitions; RAA, Schedule 9.2(B)(1)(b); see also RAA, Schedule 9.1(B)(1)(b) (for provisions effective through the 2024/2025 Delivery Year).

⁴ The deadline for the BRA for the 2029/2030 Delivery Year is August 1, 2025, in part because the BRA for the 2029/2030 Delivery Year is being conducted in the same calendar year.

⁵ RAA, Schedule 9.2(B)(1)(b).

II. COMMENTS

A. ELCC Framework

1. **ELCC Classes Impact a Resource’s Accredited UCAP and Thereby Reflect the Resource’s Expected Performance During Hours of Resource Adequacy Risk.**

To accredit the capacity capability for Capacity Resources, PJM employs an ELCC methodology, which, as a general matter, is a technology-neutral probabilistic approach to simulate loss-of-load probability across scenarios designed to determine resources’ effective contribution to resource adequacy.⁶ Using probabilistic modeling, the ELCC analysis evaluates a resource’s contribution to system reliability; the analysis distinguishes among resources with differing levels of reliability, size, and hourly output profiles to determine an ELCC rating for a given resource or a class of resources (an “ELCC Class Rating”). Resources that are able to consistently produce energy or reduce demand during hours with load shed risk have a higher ELCC rating than resources less able to do so.

The ELCC methodology recognizes and accounts for the unique characteristics of diverse resource types. It compares the expected hourly output of a resource (or resource class) against expected hourly load for all hours of a planned year. It captures variations in hourly variable resource availability, any correlation in hourly output with load patterns, seasonal variations, and the limited duration characteristic associated with resources with a storage component. PJM’s ELCC methodology accounts for this interrelationship

⁶ RAA, Schedule 9.2; *see PJM Interconnection, L.L.C.*, Capacity Market Reforms to Accommodate the Energy Transition While Maintaining Resource Adequacy, Docket No. ER24-99-000 (Oct. 13, 2023) (“2023 ELCC Filing”).

between the output of different resources within distinct categories, resources outside of those categories, and load.⁷

The capacity capability determined through the ELCC approach, i.e., a resource’s “Accredited UCAP,” is a function of the resource’s installed capacity and its expected individual performance during expected periods of resource adequacy risk. Therefore, in general, Accredited UCAP is the product of: (1) the output capability of the resource; (2) the output of the ELCC analysis (by way of the class rating); and, as applicable, (3) the resource’s performance relative to other members of the ELCC Resource’s class.⁸ In short, a resource’s Accredited UCAP reflects the resource’s expected performance during hours of resource adequacy risk.

2. ELCC Class Change Deadlines for Capacity Storage Resources Allow PJM Time to Calculate ELCC Factors that Inform Accredited UCAP.

Generally, PJM will assign each ELCC Resource to its ELCC Class “by matching the physical characteristics of such resource with the definition of the ELCC Class.”⁹ However, because the Capacity Storage Resource component is capable of performing over different duration periods (only the amount of energy it is capable of providing changes), the RAA specifies that “the Generation Capacity Resource Provider shall choose the specific ELCC Class within the type ELCC Class identified by PJM that corresponds to the chosen characteristic duration,”¹⁰ e.g., a class with 4-hour duration. This means that

⁷ 2023 ELCC Filing, *Attachment E, Affidavit of Dr. Patricio Rocha-Garrido on Behalf of PJM Interconnection, L.L.C.* at ¶ 27(a).

⁸ *PJM Interconnection L.L.C.*, Proposal to Add Two New ELCC Classes (i.e., Oil Fired Combustion Turbine Class and Waste to Energy Steam Class) and Make Conforming Revisions at 3, Docket No. ER25-1813-000 (Mar. 28, 2025).

⁹ RAA, Schedule 9.2, section B(5)(a).

¹⁰ RAA, Schedule 9.2, section B(5)(b).

the Generation Capacity Resource Provider will elect whether the ELCC Resource is in a class for, e.g., 4-hour duration resources, 6-hour duration resources, etc.¹¹ However, if the provider does not identify the preferred duration, “PJM will choose a specific ELCC Class to assign to such resource.”¹² The ELCC Class selection, by the Generation Capacity Resource Provider or PJM, shall be for a term of five consecutive Delivery Years.

A Generation Capacity Resource provider may request to change the ELCC Class for its ELCC Resources that contain a Capacity Storage Resource component by changing the resource’s chosen characteristic duration.¹³ Specifically, the Generation Capacity Resource Provider must submit to PJM, “by August 1 prior to the calendar year for the RPM Auction in which the ELCC Resource intends to submit a Sell Offer or otherwise commit to provide capacity,” “a written request to switch ELCC Classes and provide documentation supporting such change.”¹⁴

B. The Petition Will Not Adversely Harm Other Parties and Will Improve Accuracy for the Accredited UCAP Attributed to this Facility.

For the BRA for both the 2028/2029 and 2029/2030 Delivery Years, the deadline to submit a request to change ELCC Classes was August 1, 2025. This unusual scheduling circumstance occurred because BRAs for both Delivery Years are taking place in 2026.¹⁵ As a result, the deadline by which a Generation Capacity Resource provider must submit

¹¹ See *PJM Interconnection L.L.C.*, Updated Effective Load Carrying Capability Construct, Effective August 1, 2022 at 33-35, Docket No. ER21-2043-000 (June 1, 2021).

¹² RAA, Schedule 9.2(B)(5)(b).

¹³ *Id.*

¹⁴ *Id.*

¹⁵ PJM’s RPM Auction Schedule is available at <https://www.pjm.com/markets-and-operations/rpm.aspx>.

an ELCC Class change request to PJM, i.e., “by August 1 prior to the calendar year for the RPM Auction,”¹⁶ is August 1, 2025, for both years.

Petitioner explains that it missed the August 1, 2025, deadline for submitting an ELCC Class change request for the BRA for the 2029/2030 Delivery Year, because it mistakenly believed that the deadline applied only to the BRA for the 2028/2029 Delivery Year that is scheduled to occur in June 2026. Petitioner states that it incorrectly believed that it could submit a class change request for the BRA for the 2029/2030 Delivery Year (to be held in December 2026) by August 1, 2026.

Because PJM has not yet begun running ELCC models for the 2029/2030 BRA, there would be no adverse impacts should the Commission grant this waiver. Furthermore, any such impact would not be adverse given that any ELCC Class change approved would result in an Accredited UCAP for the resource that more accurately represents the resource’s expected contribution to resource adequacy for the 2029/2030 Delivery Year. Finally, PJM notes that the Commission’s granting of the Petition would still require PJM to consider the substantive merits of Petitioner’s request and could result in the ELCC Class change request being denied by PJM if it does not reflect the resource’s capability.¹⁷

C. The Commission Should Only Grant Seneca’s Requested Waiver if the Commission also Waives the RAA, Schedule 9.2, Section B(5)(b) Requirement that PJM Provide its Determination by the Following November 15.

RAA, Schedule 9.2, section B(5)(b) requires PJM to “provide no later than following November 15 written notification to the Capacity Resource Provider of its determination” regarding a Capacity Resource provider’s request to change the ELCC

¹⁶ *Id.*

¹⁷ RAA, Article 1, Definitions; RAA, Schedule 9.2(B)(5)(b). If the request is denied, PJM shall include in such notice a written explanation for the denial. *Id.*

Class of a Capacity Resource. Typically, this affords PJM three months after receipt of the ELCC Class change request and necessary supporting documentation to review and provide its determination.

However, in this circumstance the “following November 15” of the initial “August 1 prior to the calendar year for the RPM Auction”¹⁸ deadline may be interpreted to be November 15, 2025, for the BRA for the 2029/2030 Delivery Year that is set to occur in December 2026. Accordingly, the Commission should only grant the Petition if the Commission also grants waiver of the November 15 deadline for PJM to provide its determination, to the extent such waiver is deemed necessary by the Commission.

While PJM typically requires the three month period established by the RAA to review and provide determinations of such ELCC Class change requests, PJM is able to commit to providing a determination by May 29, 2026, three days after the Commission’s anticipated issuance of an order on this waiver, in this limited circumstance given that the review only implicates a single facility and that the supporting documentation and ELCC Class change request has already been provided to PJM.

¹⁸ *Id.*

III. CONCLUSION

Based on the foregoing, PJM requests that the Commission consider PJM's comments regarding the Petition for a waiver of the ELCC Class change request deadline.

Respectfully submitted

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CERTIFICATE OF SERVICE

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

Dated at Audubon, PA on this 10th day of April 2026.

/s/ Daniel Vinnik

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