



Organization of PJM States, Inc. (OPSI)

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PJM Planning Department
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
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The Organization of PJM States, Inc. (OPSI) appreciates PJM's recognition of the role of states in contributing to the assumptions and methods that PJM uses in its transmission planning processes. In recognition of this role, OPSI provides the following feedback on the assumptions in PJM's proposed capacity expansion modeling for the 2026 RTEP 8-year planning cases.¹

OPSI understands that PJM's 2034 planning models anticipate a generation shortfall of roughly 25 GW in the Summer and 18 GW in the Winter, and that even after adding all queued projects through Transition Cycle 2, PJM will remain roughly 3.5 GW short in both seasons. OPSI recognizes that for PJM's models to be solvable and credible, sufficient generation must be present to cover forecasted load and that capacity expansion modeling is an established industry practice used by utilities, RTOs, and planning organizations across the country. OPSI agrees that PJM must build defensible generation assumptions into its transmission planning models; however, PJM should also thoroughly explain any anticipated reliability challenges identified through its modeling.

Scenario A is a reasonable base case and is most consistent with assumptions from the 2025 RTEP. Running Scenario B as a sensitivity would appear to provide a useful distinction from Scenario A as long as PJM can explain how it decides which projects in the queue it deems to be uneconomic or otherwise unlikely to be built. The language in Scenario A excluding offshore wind and new gas in New Jersey, Maryland, Delaware, Illinois, and eastern Pennsylvania unless backed by an ISA, GIA, or SAA also appears to be PJM making a determination about which generation is feasible. If PJM's concern is that projects in the queue, and especially those that

¹ This letter was approved unanimously by the OPSI Board on April 24, 2026.

have an interconnection agreement, are unlikely to materialize, PJM should apply a generation expansion methodology transparently, and in a way that is rigorous, plausible, and consistent with state policy.

Separately, running a capacity expansion model right before an Interconnection Cycle Application Deadline will not be as informative as if that data from Cycle 01 was included. Therefore, PJM should consider the impact of new generation submitted in Cycle 01.

Lastly, PJM should consider a step in its planning process that informs states of capacity shortfalls and those areas where generation would most cost-effectively meet growing capacity needs considering transmission costs. States with authority to direct generation resource growth should be given the opportunity to evaluate PJM capacity shortfalls and provide input to aid PJM planning.

OPSI recognizes the reality of a generation shortfall in the 2034 planning models. However, OPSI supports reflecting that shortfall reasonably in PJM's modeling assumptions and only expanding the capacity mix where generation can realistically be expected to come online. OPSI welcomes further dialogue with PJM on these issues and looks forward to the continued discussion during the May 8 TEAC meeting.

Respectfully submitted,



Dennis P. Deters
President, Organization of PJM States