



Organization of PJM States, Inc. (OPSI)

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April 24, 2026

Reliability Backstop Procurement Feedback

The Organization of PJM States, Inc. (OPSI) writes to express its support for the six-month bilateral matchmaking phase preceding any central procurement within PJM's two-stage Reliability Backstop Procurement (RBP) proposal.¹ As proposed, PJM would conduct a bilateral matchmaking phase from September 2026 through March 2027, immediately followed by a central procurement. Contract negotiation and execution are time-intensive efforts. PJM has made a compelling case that roughly six months, beginning around September 2026, is an appropriate window for this phase, and OPSI supports that timeline as proposed.

OPSI member state commissions represent retail ratepayers who will ultimately bear the costs of any centrally procured capacity if those costs are not appropriately contracted and assigned to large load customers. For that reason, it is essential that the bilateral matchmaking phase be given adequate time and reasonable opportunity to succeed. A successful bilateral phase would reduce the volume and cost of the backstop central procurement. It would also help identify large loads that have covered their own requirements and narrow the set of those that have not. The resulting capacity costs attributed to this latter set of large loads could then be properly assigned, to the extent determined reasonable and appropriate by state regulators. PJM's proposed bilateral matchmaking phase timing will, in our view, limit risk for existing retail customers, and give states and utilities time to align applicable regulations and cost-allocation frameworks with the RBP structure.

We appreciate the substantial effort PJM has devoted to developing this proposal and offer these initial comments as the CIFP-RBP process moves forward. OPSI looks forward to continued conversations related to the development of the RBP in the coming weeks.

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

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "D.P.D." with a stylized flourish at the end.

Dennis P. Deters
President, Organization of PJM States