UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C.	**)**	**Docket No. ER27-____-000**

PROPOSED TARIFF REVISIONS FOR LARGE LOADS AND ADDITIONAL COMPLIANCE WITH CO-LOCATION ORDER AND REQUEST FOR EXTENDED 60-DAY COMMENT PERIOD

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November 16, 2026

TABLE OF CONTENTS

I. INTRODUCTION 7

II. BACKGROUND 10

A. 2025 Show Cause Orders 10

1. February Order 10

2. December Order 11

B. Compliance Filings and Paper Hearing Procedure 12

1. Thirty-Day Compliance Filing 12

2. Sixty-Day Compliance Filing 13

3. Paper hearing procedures 13

C. June 2026 Orders 14

1. Co-Location Order 14

2. Large Load Show Cause Order 15

D. Partial Extension and Partial Compliance Filing 16

E. PJM's Stakeholder Engagement Process 18

III. OVERVIEW OF PROPOSED CHANGES 22

A. Part III—NITS 22

1. NITS quantity for Large Load 22

2. Information updates 23

3. 50 MW limit on netting Behind the Meter Generation 24

B. Part VIII—Fast Energization Process 27

1. The Fast Energization Process is designed for speed and accuracy 27

2. The Fast Energization Process includes a Soft Close Date and Early Application Engagement to improve the quality of Applications and reduce disputes and litigation 30

3. Timing of Fast Energization Process implementation and the interim period 30

4. PJM is eschewing parallel processes, to streamline for speed and accuracy 32

5. PJM will maintain transparency of its study results 33

C. Part XI—New Transmission Services 33

1. Interim NITS 33

2. Contract Demand Transmission Service 37

3. Common service provisions for Interim NITS and Contract Demand Transmission Services 42

4. Pro Forma Service Agreement for Interim NITS (Attachment F-3A) 45

5. Pro Forma Service Agreement for Contract Demand Transmission Service (Attachment F-4) 48

D. Re-Filing Co-Located Load Compliance Changes 50

1. Prohibition on serving Co-Located Load from existing generators 50

2. Expansion of service to "Eligible Load" for load with BTMG 52

3. Elimination of new GIA requirement 54

4. Effective date only 57

E. Changes to Be Addressed in Future Filings 57

IV. THE COMMISSION SHOULD ACCEPT THE PROPOSED CHANGES AS JUST AND REASONABLE 59

A. The Proposed Fast Energization Process Is Just and Reasonable and Advances the Commission's Categories for Reform in the June 2026 Orders 59

B. Core Features of the Fast Energization Process That Enhance the Current Cycle Process 60

1. PJM's current process provides only some visibility into the transmission needs created by Large Loads 60

2. Resource Adequacy requires getting new generation online faster 60

3. Incremental and parallel fixes are not enough – a singular process for generation and transmission service requests yields efficiencies 61

4. The Fast Energization Process is a single, unified process that should be twice as fast as the current process 62

5. Technology and early engagement speed the process 63

6. Study consolidation preserves study rigor 64
7. Readiness requirements are moved to the front of the process....65
8. A portfolio approach to system reinforcements provides transparency and certainty 66
9. Interim rights allow service to begin sooner....67
C. The Fast Energization Process Is Consistent with the Large Load Show Cause Order's Directives 68
1. Timely, clear, and consistent study of transmission service for large loads 69
2. Readiness requirements that deter speculative requests 70
3. Transparency regarding upgrades and their costs....71
4. Protection against cost shifting 71
5. Transmission services that reflect flexible use of the system 73
6. Studying generation and transmission service requests to serve Large Load together leverages technology and innovation 73
7. PJM's proposal respects existing commercial arrangements and provides for a clear transition from the existing process to the Fast Energization Process....75
D. The New Transmission Services Proposed in Part XI are Just and Reasonable 77
E. PJM's Proposed Changes to NITS are Just and Reasonable 79
V. EFFECTIVE DATE.... 82
VI. CONSENT TO SEVERANCE OF ISSUES.... 82
VII. DOCUMENTS ENCLOSED.... 84
VIII. CORRESPONDENCE AND COMMUNICATIONS.... 85
IX. SERVICE.... 85
X. CONCLUSION.... 87

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November 16, 2026

Honorable Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Re: *PJM Interconnection, L.L.C., Docket No. ER27-____-000*
Proposed Tariff Revisions for Large Loads and Additional Compliance with Co-Location Order and Request for Extended 60-Day Comment Period

Dear Secretary Reese:

Pursuant to section 205 of the Federal Power Act ("FPA"),[1] part 35 of the Federal Energy Regulatory Commission's ("Commission") regulations,[2] and the August 14, 2026 letter order issued in Docket No. EL26-67-000,[3] PJM Interconnection, L.L.C. ("PJM") hereby proposes revisions to Parts I, III, VI, VII, VIII, IX, X, and XI, and Attachments F-3, F-3A, and F-4 of PJM's Open Access Transmission Tariff ("Tariff"), and to Schedule 8 of the Reliability Assurance Agreement Among Load Serving Entities in the PJM Region ("RAA").[4] With the reforms proposed here and the other filings being concurrently

[1] 16 U.S.C. § 824d.

[2] 18 C.F.R. part 35.

[3] *PJM Interconnection*, *L.L.C.*, 196 FERC ¶ 61,129, at P 10 (2026) (noting that to extent PJM submits "an FPA section 205 filing addressing the Commission's preliminary findings in the Show Cause Order on or before November 16, 2026, then the obligation of the respondent(s) who have made such an FPA section 205 filing to file a response to the Show Cause Order will be suspended").

[4] The PJM Transmission Owners ("Transmission Owners") are separately filing revisions to Tariff, Parts VIII, IX, and XI to add provisions concerning the allocation of the costs of system reinforcements needed for generator interconnection and transmission service for Eligible Loads and Large Loads, a cost-recovery framework for those system reinforcements, and proposed rates for the three new transmission services PJM proposes to offer. PJM concurrently is filing ride-through provisions for Large Computational Load to mitigate against future incidents like the one that occurred July 22, 2026, in the PJM Region, along with other proposed operational requirements and annual transmission service reporting requirements. That filing, and all evidence submitted in support thereof, is incorporated by reference into this filing. Given the multiple same-day filings and the fact that these filings are making changes, some of them overlapping, to over 100

submitted today as described in Attachment D, PJM has responded fully to the Large Load Show Cause Order and requests that the FPA section 206 aspect of the order be closed.

The Tariff revisions PJM proposes include:

- Revisions to the terms and conditions for Network Integration Transmission Service ("NITS")[5] to impose new terms and conditions on Eligible Customers taking transmission service on behalf of Eligible Load (including specifically Co-Located Load and customers with Behind the Meter Generation ("BTMG")) and Large Loads;[6]

- Revisions to Part VIII of the Tariff to create the new Fast Energization Process, which will study together New Service Requests, including Generation Interconnection Requests, and requests from Eligible Customers seeking transmission service on behalf of Eligible Load and Large Load[7] in a single, 12-month process;[8]

- Addition of the new Part XI to the Tariff, providing the terms and conditions for new transmission services (Interim NITS, Firm Contract Demand ("FCD") Transmission Service, and Non-Firm Contract Demand ("NFCD")

Tariff sections in nine parts of the Tariff, PJM expects it will need to make one or more clean-up filings in the future to ensure the Tariff is clear, and commits to doing so. PJM will promptly submit a letter in Docket Nos. EL25-49 and EL26-27 informing participants in those dockets of today's tariff filings, some parts of which are submitted in compliance with Commission directives and others of which are submitted pursuant to Section 205 of the FPA. In an abundance of caution, PJM requests waiver of any regulation or filing requirements relating to submissions in Docket Nos. EL25-49 and EL26-27 relating to today's tariff filings. Good cause exists to grant any necessary waivers because submission of these tariff filings in the structure presented efficiently addresses the complexity of the overlapping filing obligations and differing requested effective dates, PJM is requesting a sixty-day comment period and 120 day Commission action date that affords interested participants reasonable time to engage in the tariff filing dockets.

[5] Terms not otherwise defined herein shall have the meaning set forth in the Tariff, the RAA, or Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. ("Operating Agreement").

[6] *See infra* Section III.A.

[7] The Commission accepted PJM's definition of "Large Load" as "end-use customer(s) load that has a cumulative peak load of 50 [megawatts ("MW")] or greater at a single electrical site behind one or more points of interconnection, where for configurations involving multiple affiliated load facilities or multiple points of interconnection with affiliated load facilities behind them, all affiliated load facilities within a one-mile radius will be considered a single electrical site as further described in the PJM Manuals" in its October 9, 2026 order in Docket No. ER26-3515-000. *PJM Interconnection, L.L.C.*, 197 FERC ¶ 61,019, at PP 13, 24 (2026). That definition is now in the RAA, Article I, Definitions, and cross-referenced in Tariff, Parts I and VIII. *PJM Interconnection, L.L.C.*, Thirty-Day Compliance Filing to the Commission's October 9, 2026 Order on PJM's Large Load Definition and Large Load Registry, Docket No. ER26-3515-002 (Nov. 9, 2026).

[8] *See infra* Section III.B.

Transmission Service) available to Eligible Customers taking transmission service on behalf of Eligible Load and Large Load;[9] and

- Revised versions of Tariff provisions concerning Co-Located Load and BTMG pending in Docket No. ER26-1479-002,[10] which PJM has reevaluated and revised in connection with its response to the Order Instituting Proceeding Under Section 206 of the FPA ("Large Load Show Cause Order").[11]

PJM's proposed revisions address the Commission's areas of concern in the Large Load and Co-Located Load show cause proceedings: promotion of reliability; efficient transmission service study processes; cost transparency and mitigation of cost-shifting; flexible load service; accommodating Co-Located Loads and BTMG; and generation study procedures for generators serving electrically proximate Large Loads and Co-Located Loads. PJM proposes to add to its Tariff an enhanced process to identify and study transmission service for new Large Loads. PJM will require Large Loads (i.e., loads over 50 MW at a single location) to be identified on a registry to set a baseline for the current level of transmission service.[12] PJM will then require any new requests for transmission service or requests to increase existing service beyond the baseline level to apply for that service and be studied.[13] In evaluating such requests, PJM proposes to use a new, reformed "Fast Energization Process," to make the study process faster, even more focused on

[9] *See infra* Section III.C.

[10] *See infra* Section III.D. Revisions to these Tariff provisions were filed initially on August 17, 2026, *PJM Interconnection, L.L.C.*, Compliance Filing of PJM Interconnection, L.L.C. in Response to Order on Rehearing, Clarification, Compliance Filing, and Paper Hearing in Docket Nos. EL25-49-002, et al, Docket No. ER26-1479-002 (Aug. 17, 2026) ("August 17 Filing"), in compliance with the Commission's June 18, 2026 order in Docket Nos. EL25-49-000, et al. *PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,209 ("Co-Location Order"), *notice of denial of reh'g by operation of law & providing for further consideration*, 196 FERC ¶ 62,089 (2026). Earlier today, PJM filed a motion to withdraw the August 17 Filing in Docket No. ER26-1479-002 so that it could file replacement revisions in this filing.

[11] *PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,211, *errata notice*, 196 FERC ¶ 61,122, *order dismissing requests for reh'g & clarification*, 196 FERC ¶ 61,214 (2026).

[12] *See* Attachment A-1, Proposed Tariff, Part III, General.

[13] *See infra* Section III.A.

readiness and certainty, and provide enhanced transparency.[14] The Fast Energization Process proposes key reforms to the existing process to complete studies in 12 months.[15] PJM's Fast Energization Process will study requests for transmission service and Generation Interconnection Requests together to optimize the Transmission System and yield efficiencies for electrically proximate load and generation.[16]

PJM also proposes implementing the three new transmission services the Commission put forward in a way that will ensure reliability, with technical and operational limitations on withdrawals of energy by flexible Large Loads and Eligible Loads, and on injections of energy by Eligible Generating Facilities.

In short, this filing responds in a unified fashion to two separate show cause orders, one that has been ongoing for almost two years, with briefing and several compliance filings required, and a second issued only five months ago, with overlapping concerns and considerations. A chart detailing where each directive from the Co-Location Order and the Large Load Show Cause Order (together, "June 2026 Orders")[17] is addressed is provided as Attachment D to this filing.[18] In light of the resulting scope and complexity of this filing, PJM respectfully requests that the Commission establish a 60-day comment period for this filing, to allow all interested parties sufficient time to review the proposed revisions and for PJM to continue to engage with stakeholders after filing to potentially further improve and augment the proposals set forth in this filing. PJM further requests a Commission

[14] *See infra* Section III.B.

[15] *See infra* Section III.B.

[16] *See infra* Section III.B.

[17] Co-Location Order, 195 FERC ¶ 61,209; Large Load Show Cause Order, 195 FERC ¶ 61,211.

[18] *See generally* Attachment D, Chart Mapping Order Directives to Tariff Changes attached hereto.

order on this filing within 120 days. The Commission's full acceptance of this filing within 10 months of the date it is filed would likely be necessary to facilitate implementation in time for Cycle 02.[19]

As PJM discussed in the PJM Abeyance Motion,[20] the Commission's June 2026 Orders presented certain interrelated and overlapping issues that PJM needed to address in a holistic, coordinated manner.[21] PJM noted in the PJM Abeyance Motion that the June 2026 Orders directed PJM to expand the availability of new transmission services, enhance its Large Load study procedures, and detail the operational requirements and control technologies that customers taking transmission service on behalf of certain loads must use.[22] PJM submitted a partial compliance filing on August 17, 2026, that addressed certain directives of the Co-Location Order.[23]

Since the August 17 Filing, and as PJM worked on its response to the Large Load Show Cause Order, PJM has determined that it must amend its earlier filing to comply with the Co-Location Order to harmonize the treatment of Eligible Loads and Large Loads. PJM therefore seeks an effective date of March 16, 2027, for certain Tariff revisions in Part VIII relating to Eligible Loads and for the revisions in Part III and the new Part XI, to establish available services as soon as practicable. PJM seeks an indefinite effective date for the

[19] *See infra* Section III.B.3 (explaining that the Submission Window for the first Cycle under the Fast Energization Process would open in late November 2027).

[20] *PJM Interconnection, L.L.C.*, Motion of PJM Interconnection, L.L.C. to Hold Proceeding in Abeyance and Request for Shortened Answer Period and Expedited Treatment, Docket No. EL26-67-000, at 4-8 (July 28, 2026); *PJM Interconnection, L.L.C*, Motion for Extension of Time for Specified Compliance Requirements and Request for Expedited Treatment of PJM Interconnection, L.L.C., Docket Nos. EL25-49-000, et al., at 4-8 (July 28, 2026) ("PJM Extension Motion").

[21] *See supra* note 10.

[22] PJM Abeyance Motion at 4-5.

[23] PJM Abeyance Motion at 1, 6-7; PJM Extension Motion at 1-2, 6-7.

Fast Energization provisions of Part VIII, as the Fast Energization Process cannot begin until Cycle 01 of PJM's current interconnection process is sufficiently advanced.[24]

Each element of this proposal is just and reasonable. However, if the Commission deems necessary, and to help facilitate the Commission's acceptance of this filing without delay so that PJM can comply expeditiously with the June 2026 Orders, PJM provides notice that it consents to the Commission's exercise of authority to sever any element of the Proposed Tariff and RAA language to the extent necessary and permitted under sections 205 and 206 of the FPA and *NRG Power Marketing, LLC v. FERC*.[25]

PJM submits this filing pursuant to its independent authority to modify its Tariff under FPA section 205 pursuant to Tariff, Part I, section 9.2(a) and the Consolidated Transmission Owners Agreement ("CTOA"), section 7.5.1(ii), following the requisite consultation specified under Tariff, Part I, section 9.2(b) and the CTOA, section 7.5.1(ii).

[24] In order to avoid intervening proposed Tariff revisions from other filings potentially causing the Tariff revisions herein to be overwritten, PJM has included revisions with proposed effective dates of March 16, 2027, in certain of the Tariff sections with indefinite dates that are attached hereto as Attachment A-2. Specifically, the changes proposed to the following Tariff sections with a proposed March 16, 2027 effective date have been added into the proposed revisions in the version of the marked Tariff with an indefinite effective date: Tariff, Part VIII, section 400, Definitions C, E, N, P, and R; and Tariff, Part VIII, sections 401, 403, 404, 406, 408, and 414. When PJM makes a compliance filing to establish the effective date for the sections listed here that it is filing with indefinite effective dates, assuming they are accepted, it will address the earlier language and update its status as well.

[25] *NRG Power Mktg., LLC v. FERC*, 862 F.3d 108 (D.C. Cir. 2017). As the Commission has often stated, "[t]he United States Court of Appeals for the District of Columbia Circuit has held that, in certain circumstances, the Commission has 'authority to propose modifications to a utility's [FPA section 205] proposal if the utility consents to the modifications.'" *N.Y. Indep. Sys. Operator, Inc.*, 188 FERC ¶ 61,051, at P 22 n.36 (2024) (alteration in original) (citing *NRG Power Mktg.*, 862 F.3d at 114-15); *see Midcontinent Indep. Sys. Operator, Inc.*, 180 FERC ¶ 61,141, at P 26 n.29 (2022) (same), *order on reh'g*, 182 FERC ¶ 61,096 (2023), *aff'd sub nom.*, *Entergy Ark., LLC v. FERC*, 109 F.4th 583 (D.C. Cir. 2024); *ISO New Eng. Inc.*, 175 FERC ¶ 61,172, at P 16 n.20 (2021) (same).

I. INTRODUCTION

As it is elsewhere in the country, data center construction and operation is causing unprecedented load growth in the PJM Region.[26] PJM's 2025 long-term load forecast shows a peak load growth of 32 gigawatts ("GW") from 2024 to 2030, with 30 GW of that growth coming from data centers.[27] PJM's 2026 long-term load forecast projects a 3.6% annual increase in its summer peak load over the next 10 years;[28] in 2023, PJM projected just a 0.8% annual increase over a 10-15 year horizon.[29] The extraordinary growth of data centers and other Large Loads presents unique reliability and resource adequacy challenges as compared to traditional loads. Data centers have significant energy and capacity demands and can be built faster (12-18 months) than the generation and transmission facilities necessary to meet those demands.[30] The North American Electric Reliability Corporation ("NERC") recognizes this as a resource adequacy issue, explaining that Large Loads are "magnitudes larger than most loads historically seen on the system and

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[26] *RTEP 2024: Regional Transmission Expansion Plan*, PJM Interconnection, L.L.C., 47 (Apr. 17, 2025), https://www.pjm.com/-/media/DotCom/library/reports-notices/2024-rtep/2024-rtep-report.pdf [https://perma.cc/PV4N-VA3P] (explaining that there is significant load growth in the PJM Balancing Authority Area due to new construction of data centers). As the Commission also has recognized, Large Loads have unique operational characteristics, including significant load fluctuations. As noted earlier, PJM is concurrently proposing ride through requirements and other operational requirements in a separate section 205 filing.

[27] *Letter from David E. Mills, PJM Board of Managers Chair*, PJM Interconnection, L.L.C. to PJM Stakeholders, 1 (Aug. 8, 2025), https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2025/20250808-pjm-board-letter-re-implementation-of-critical-issue-fast-path-process-for-large-load-additions.pdf [https://perma.cc/977B-93NW].

[28] PJM Resource Adequacy Planning Department, *2026 PJM Load Forecast Report*, PJM Interconnection, L.L.C., 6 (Jan. 14, 2026), https://www.pjm.com/-/media/DotCom/library/reports-notices/load-forecast/2026-load-report.pdf [https://perma.cc/6BPF-LJYA].

[29] PJM Resource Adequacy Planning Department, *PJM Load Forecast Report: January 2023*, PJM Interconnection, L.L.C., 3 (Jan. 2023), https://www.pjm.com/-/media/DotCom/library/reports-notices/load-forecast/2023-load-report.ashx [https://perma.cc/XG66-PBQK].

[30] *Characteristics and Risks of Emerging Large Loads: Large Loads Task Force White Paper*, North America Electric Reliability Corporation, 15-16 (July 2025), https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/3_doc_white-paper-characteristics-and-risks-of-emerging-large-loads.pdf [https://perma.cc/HVX5-8J9V] ("NERC Large Loads White Paper").

proliferating more quickly than most historical load growth" and therefore "the need for additional generation may not have been planned for, and current system plans may not be able to meet it."[31] Additionally, unlike traditional loads, Large Loads can materialize and grow quickly in geographically concentrated areas,[32] which makes them more difficult to plan for than other loads.[33] In the Large Load Show Cause Order, the Commission recognized the material differences between Large Loads and other load categories, explaining that "integrating large loads poses specific challenges to transmission system operation given their size, operational behavior, and unique potential to impact the transmission system."[34]

To meet this moment, the Commission, on its own motion and in response to section 205 filings, has issued a number of landmark orders stimulating innovation and advancement. In parallel, the PJM Five-Year Strategy released September 1, 2026, sets forth how PJM will lead during the next five years and beyond, with reliability as its North Star.[35] The third objective of the PJM Five-Year Strategy, titled "Proactively Adapt Planning Processes," includes multiple workstreams to achieve this objective. These include: (1) a one-year generation interconnection process; (2) incorporating Large Load

[31] NERC Large Loads White Paper at 16.

[32] *See* Declaration of Donald Bielak, P.E. on Behalf of PJM Interconnection, L.L.C. (Attachment C) ¶ 15 ("Bielak Decl.") ("Large Loads differ fundamentally from traditional loads in their size, pace of growth, and concentration, and they are presently the major source of load growth in the PJM Region.").

[33] NERC Large Loads White Paper at 16 ("The arrival and timing of large loads is also frequently uncertain. . . . Some proposed large loads do not materialize as planned: they may be canceled due to economic and financial challenges or other setbacks. Due to the uncertainty of these large loads materializing, forecasting load for resource adequacy and transmission planning may be much more difficult.").

[34] *See* Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 58.

[35] *Corporate Strategy and Value*, PJM Interconnection, L.L.C., https://www.pjm.com/about-pjm/corporate-strategy-and-value [https://perma.cc/N92H-AQZ8] (last visited Nov. 14, 2026).

forecasting and modeling into planning processes; (3) determining interim solutions for near-term reliability needs; and (4) creating a synchronized planning and interconnection process for greater efficiency and transparency.[36] These objectives align closely with the Commission's Large Load Show Cause Order, offering PJM an opportunity to accelerate its strategic timeline.

Through this filing, PJM responds to the Large Load Show Cause Order, consistent with strategic objectives to proactively adapt PJM's planning processes to deliver accelerated interconnection and transmission service and processes. PJM proposes to efficiently, reliably, and transparently provide transmission service to both co-located and flexible Large Loads (i.e., Large Loads that are not co-located with generation, but are willing and able to limit their energy withdrawals from the Transmission System under certain conditions)[37] and to quickly bring additional generation online to meet current and forecasted demand from Large Loads. PJM further proposes Tariff revisions to provide just and reasonable terms and conditions of service for the provision of transmission service, including the new transmission services the Commission first advanced for Co-Located Load in PJM and then proposed more broadly in show cause orders for all the jurisdictional Regional Transmission Organizations, including the Large Load Show Cause Order directed to PJM and Transmission Owners in the PJM Region.[38]

PJM also seeks to meet the need for "speed to power" and accelerate its generation interconnection procedures to a one-year process by leveraging technology and process

[36] *Shaping a Power Change: PJM Five-Year Strategy*, PJM Interconnection, L.L.C., 9 (Aug. 2026), https://www.pjm.com/-/media/DotCom/library/reports-notices/special-reports/2026/20260819-shaping-a-powerful-change-pjm-five-year-strategy.pdf [https://perma.cc/2RBY-MPLH].

[37] *See* Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 85 n.178.

[38] *See generally* Large Load Show Cause Order, 195 FERC ¶ 61,211.

efficiencies. PJM will deliver at each turn of its new process non-binding good-faith estimates of the cost and time to construct facilities within 60-90 calendar days, consistent with the Commission's findings in the Large Load Show Cause Order.[39] To provide transmission service to Eligible Loads and Large Loads as contemplated in the June 2026 Orders, PJM proposes to add transmission service requests to the existing New Service Request study process in Tariff, Part VIII, which will allow PJM to optimize upgrades to the Transmission System, eliminate duplicative upgrades, and offer timely transmission service and generator deliverability based on current system topology rather than requiring customers to wait on contingent upgrades to be built. With the reforms proposed here and the supplemental filings PJM proposes to make, addressed in Section III.G below, PJM has responded fully to the Large Load Show Cause Order and requests that the FPA section 206 aspect of the order be closed.

II. BACKGROUND

A. 2025 Show Cause Orders

1. February Order

Following a technical conference discussing the co-location of large loads at generating facilities, the Commission initiated a show-cause proceeding against PJM and the Transmission Owners on February 20, 2025 ("February Order").[40] In the February Order, the Commission expressed concern that PJM's Tariff did not address co-location arrangements with sufficient clarity and consistency.[41] The Commission made several

[39] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 63; Bielak Decl. ¶ 21.

[40] *PJM Interconnection, L.L.C.*, 190 FERC ¶ 61,115, *order on show cause*, 193 FERC ¶ 61,217 (2025) ("December Order"), *order on compliance*, 195 FERC ¶ 61,030, *order on reh'g, clarification, compliance & paper hearing*, Co-Location Order,195 FERC ¶ 61,209.

[41] February Order, 190 FERC ¶ 61,115, at P 2.

preliminary findings that the Tariff appeared to be unjust and unreasonable regarding co-location arrangements, and it directed PJM and the Transmission Owners to respond to numerous questions addressing its concerns.[42]

2. December Order

On December 18, 2025, the Commission issued an order on show cause finding the Tariff unjust and unreasonable due to, among other reasons, the lack of specificity for the rates, terms, and conditions that apply to Interconnection Customers[43] serving Co-Located Load and Eligible Customers taking transmission service on behalf of Co-Located Load.[44] The December Order directed PJM to make a compliance filing within 30 days to, among other things, clarify the rates, terms, and conditions that apply to an Interconnection Customer seeking to serve Co-Located Load with new generation.[45] The December Order also directed PJM to make a compliance filing within 60 days to revise the Tariff in a number of ways, including to modify the retail BTMG netting rules to limit netting over a certain threshold[46] and to require that an Eligible Customer taking transmission service on behalf of a Co-Located Load select at least one of three transmission services: (1) NITS or Interim NITS; (2) FCD Transmission Service; or (3) and NFCD Transmission Service.[47]

[42] February Order, 190 FERC ¶ 61,115, at PP 74-75, 87-88.

[43] Under PJM's current interconnection rules in Tariff, Parts VII, VIII, and IX, Interconnection Customers are referred to as "Project Developers." PJM uses in this filing the term used in its current interconnection rules, but it should be understood as consistent with the Commission's references to Interconnection Customers.

[44] December Order, 193 FERC ¶ 61,217, at P 159.

[45] December Order, 193 FERC ¶ 61,217, at PP 232-35.

[46] December Order, 193 FERC ¶ 61,217, at P 221.

[47] December Order, 193 FERC ¶ 61,217, at P 193.

The December Order established a paper hearing procedure to obtain additional evidence to determine the appropriate rates, terms, and conditions for these transmission services.[48] The Commission required parties to address, among other things, the interconnection requirements and operational practices necessary to maintain system reliability if a Co-Located Load or associated generator trips offline and the eligibility requirements necessary for an Eligible Customer to take FCD or NFCD Transmission Service on behalf of Co-Located Load.[49]

B. Compliance Filings and Paper Hearing Procedure

1. Thirty-Day Compliance Filing

On January 20, 2026, PJM made its 30-day compliance filing in Docket No. ER26-1088-000 pursuant to the December Order ("Thirty-Day Compliance Filing").[50] Among other changes, the Thirty-Day Compliance Filing proposed to clarify that existing services in the Tariff could be used by Project Developers serving Co-Located Load, including Provisional Interconnection Service and Surplus Interconnection Service.[51] The Thirty-Day Compliance Filing also clarified that Project Developers serving Co-Located Load can request interconnection service below nameplate capacity and accelerate the interconnection process under certain circumstances.[52] The Commission accepted in part and rejected in part PJM's compliance filing in an order on April 16, 2026;[53] PJM

[48] *See* December Order, 193 FERC ¶ 61,217, at PP 194, 203, 207, 219.

[49] December Order, 193 FERC ¶ 61,217 at P 219(8), (10).

[50] *PJM Interconnection, L.L.C.*, Thirty-Day Compliance Filing with Order on Show Cause of PJM Interconnection, L.L.C., Docket No. ER26-1088-000 (Jan. 20, 2026).

[51] Thirty-Day Compliance Filing at 5-7.

[52] Thirty-Day Compliance Filing at 4-5.

[53] *PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,030.

submitted an additional compliance filing on May 18, 2026, to comply with the Commission's order.[54]

2. Sixty-Day Compliance Filing

On February 23, 2026, PJM made its 60-day compliance filing in Docket No. ER26-1479-000 pursuant to the December Order ("Sixty-Day Compliance Filing").[55] The Sixty-Day Compliance Filing proposed Tariff revisions to, among other things: (1) amend PJM's BTMG Tariff provisions;[56] (2) establish certain aspects of three new transmission services for Eligible Customers seeking to take service on behalf of Co-Located Load;[57] and (3) amend PJM's Necessary Studies processes.[58]

3. Paper hearing procedures

PJM submitted an initial brief to address the Commission's finding in the December Order that additional record evidence was needed to set the appropriate replacement rates, terms, and conditions for new transmission services for Eligible Customers serving Co-Located Load, including for Interim NITS, FCD Transmission Service, and NFCD Transmission Service.[59] PJM's initial brief set forth the non-rate terms and conditions for these new transmission services along with illustrative Tariff language. Various parties

[54] *PJM Interconnection, L.L.C.*, Compliance Filing to the Commission's April 16 Order on PJM's Thirty-Day Compliance Filing with the Order to Show Cause of PJM Interconnection, L.L.C., Docket No. ER26-1088-001 (May 18, 2026).

[55] *PJM Interconnection, L.L.C.*, 60-Day Compliance Filing for Co-Located Load Related Revisions to Open Access Transmission Tariff to Comply with Commission Order in Docket No. EL25-49, et al. of PJM Interconnection, L.L.C., Docket No. ER26-1479-000 (Feb. 23, 2026) ("Sixty-Day Compliance Filing").

[56] Sixty-Day Compliance Filing at 4-18.

[57] Sixty-Day Compliance Filing at 18-24.

[58] Sixty-Day Compliance Filing at 24-28.

[59] *PJM Interconnection, L.L.C.*, Brief of PJM Interconnection, L.L.C., Docket Nos. EL25-49-000, et al. (Feb. 23, 2026) ("PJM Initial Brief").

protested aspects of PJM's illustrative Tariff language.[60] PJM proposed certain refinements to the illustrative language in its reply brief.[61]

C. June 2026 Orders

1. Co-Location Order

The Commission issued the Co-Location Order addressing the Sixty-Day Compliance Filing, the paper hearing submissions, and requests for rehearing and clarification of the December Order.[62] The Co-Location Order accepted most of PJM's proposed Tariff changes, but directed PJM to make a number of additional changes within 60 days.[63] Among other things, the Co-Location Order directed PJM to revise the Tariff to adopt more detailed study procedures for customers requesting FCD and/or NFCD Transmission Service that mirror existing cluster study procedures.[64] The Co-Location Order also directed PJM to make new transmission services available to customers with BTMG that are willing and able to limit their withdrawals from the Transmission System.[65] To accomplish this, the Commission directed PJM to either add a definition of "Eligible Load" that encompasses customers serving Co-Located Load and customers serving load

[60] *See, e.g.*, *PJM Interconnection, L.L.C.*, Reply Brief of Joint Co-Location Developers and Motion to Intervene Out-of-Time of Calibrant, Convergent, U.S. Energy Storage Coalition, and Verrus, Docket Nos. EL25-49-000, et al., at 2 (Mar. 25, 2026); *PJM Interconnection, L.L.C.*, Reply Brief and Protest of Enchanted Rock, Docket Nos. EL25-49-000, et al., at 7-9 (Mar. 25, 2026) (arguing that PJM's proposal "renders Interim NITS entirely unworkable"); *PJM Interconnection, L.L.C.*, Reply Brief of Advanced Energy United and Solar Energy Industries Association, Docket Nos. EL25-49-000, et al., at 6-10 (Mar. 25, 2026).

[61] *PJM Interconnection, L.L.C.*, Reply Brief of PJM Interconnection, L.L.C., Docket Nos. EL25-49-000, et al., Attachment A (Redlines on Reply Brief to Illustrative Language for New Tariff, Part XI; Attachments F-3A and F-4; and Other Illustrative Tariff Revisions), Illustrative Tariff, Part XI, Subpart A, section 701.1 (Apr. 24, 2026) ("PJM Reply Brief").

[62] *See* Co-Location Order, 195 FERC ¶ 61,209, at PP 1-2, 4-7.

[63] *See, e.g.*, Co-Location Order, 195 FERC ¶ 61,209, at P 280 (directing PJM to revise Tariff to specify what information about Necessary Studies will be available in the PJM Manuals).

[64] Co-Location Order, 195 FERC ¶ 61,209, at P 370.

[65] Co-Location Order, 195 FERC ¶ 61,209, at P 91.

with BTMG, or to propose comparable Tariff revisions.[66] The Co-Location Order further required PJM to revise the Tariff to provide additional detail regarding the operational requirements and necessary control technologies to be employed for customers taking new transmission services on behalf of Eligible Load.[67]

2. Large Load Show Cause Order

The Large Load Show Cause Order found that several aspects of the Tariff appeared unjust and unreasonable because it lacked specific procedures for integrating large loads, including Large Load-specific procedures for interconnection studies, processing transmission service requests, and providing transmission service without cost shifting.[68] The Large Load Show Cause Order also found that the Tariff appeared to be unjust and unreasonable because it lacked transmission service options for customers serving large loads that are willing and able to limit their withdrawals from the Transmission System.[69] The Commission was specifically concerned whether the Tariff was just and reasonable without allowing customers to take Interim NITS, FCD Transmission Service, and/or NFCD Transmission Service on behalf of Eligible Load.[70] The Commission also emphasized that, in the Co-Location Order, it approved a requirement that customers taking transmission service on behalf of Eligible Load must have necessary control technologies or protection systems to limit energy withdrawals to approved levels.[71] The Large Load

[66] Co-Location Order, 195 FERC ¶ 61,209, at P 91.

[67] Co-Location Order, 195 FERC ¶ 61,209, at PP 482, 541.

[68] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 59-60, 65, 77.

[69] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 86.

[70] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 87.

[71] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 87 & n.189 (citing Co-Location Order, 195 FERC ¶ 61,209, at P 480).

Show Cause Order further found that PJM's Tariff appeared to be unjust and unreasonable due to a lack of mechanisms to ensure that costs are not shifted between transmission customers.[72]

To address these issues, the Large Load Show Cause Order directed PJM to make two compliance filings.[73] First, the Large Load Show Cause Order directed PJM to submit an informational filing within 30 days to explain how PJM intends to ensure that it has adequate generation to serve existing and new large loads.[74] Second, the Large Load Show Cause Order directed PJM to submit within 60 days a compliance filing explaining whether its Tariff remains just and reasonable in light of the issues identified in the order, or to propose Tariff changes that would remedy the identified concerns.[75] The Commission noted that it would entertain requests to hold the show cause proceedings in abeyance if PJM demonstrated a plan to file changes pursuant to FPA section 205 to address the identified concerns.[76]

D. Partial Extension and Partial Compliance Filing

On July 28, 2026, PJM moved for a 90-day extension of time to meet certain Co-Location Order requirements,[77] and it simultaneously requested the Commission to hold the Large Load Show Cause Order proceedings in abeyance for 90 days.[78] PJM explained that the June 2026 Orders contained certain interrelated and overlapping issues that must

[72] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 77.

[73] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 3-4.

[74] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 4.

[75] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 3.

[76] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 39.

[77] *See generally* PJM Extension Motion.

[78] *See generally* PJM Abeyance Motion.

be addressed on a holistic basis, which required additional time and stakeholder engagement.[79] For example, PJM noted that the June 2026 Orders both directed PJM to expand the availability of new transmission services, enhance its Large Load study procedures, and detail the operational requirements and control technologies that customers taking transmission service on behalf of certain loads must use.[80] PJM committed to submitting a partial compliance filing by August 17, 2026, that addressed certain directives of the Co-Location Order.[81] The Commission granted PJM's requests on August 14, 2026.[82]

Pursuant to its commitment, PJM made a partial compliance filing on August 17, 2026, in Docket No. ER26-1479-002 to address many of the Co-Location Order's directives, including by proposing to add the term Eligible Load to the Tariff to encompass both Co-Located Load and load with BTMG; adopting various modifications to the terms and conditions for Interim NITS; modifying the definition of Retail BTMG to eliminate the 50 MW nameplate limit for netting; and removing the requirement for existing customers to execute a new Generation Interconnection Agreement ("GIA") to serve Co-Located Load.[83]

[79] PJM Abeyance Motion at 4-8; PJM Extension Motion at 4-8.

[80] PJM Abeyance Motion at 4-5.

[81] PJM Abeyance Motion at 1, 6-7; PJM Extension Motion at 1-2, 6-7.

[82] *PJM Interconnection, L.L.C.*, Notice of Extension of Time, Docket Nos. EL25-49-000, et al. (Aug. 14, 2026).

[83] *See generally* August 17 Filing.

E. PJM's Stakeholder Engagement Process

PJM held engagement sessions to inform stakeholders about the June 2026 Orders and solicit feedback on the proposed Tariff revisions PJM would file in response to those orders. PJM's stakeholder engagement process is detailed below:

- **July 30, 2026, Co-Located Load Order Workshop ("CLLOW")**: PJM presented on the June 2026 Orders and explained PJM's proposed compliance approach.[84]
- **August 18, 2026, CLLOW**: PJM provided an update on its June 2026 Orders compliance strategy. PJM presented its proposed Large Load Show Cause Order compliance framework[85] and discussed the overlap between Large Load, Co-Located Load, and load with BTMG.[86] PJM solicited and received stakeholder feedback on its presentation.[87]
- **September 16, 2026, CLLOW**: PJM presented its proposed process for integrating Large Loads with the Transmission System, pursuant to the Large

[84] *See Co-Located Load Order Workshop*, PJM Interconnection, L.L.C., https://www.pjm.com/committees-and-groups/workshops/cllsco [https://perma.cc/B3FW-BRLM] (last visited Nov. 12, 2026) (follow "Meeting Materials" subheading; then choose "2026" from dropdown; then choose "7.30.2026 – Co-Located Load Order Workshop"; then select and click "Download").

[85] Donnie Bielak, *Show Cause for Large Loads Framework*, PJM Interconnection, L.L.C. (Aug. 18, 2026), 20260818-item-03---show-cause-for-large-loads-framework---presentation.pdf [https://perma.cc/V2Q3-A9NT].

[86] *See* Tim Horger, *Overlap of Large Load, Co-Located Load and Load with BTMG*, PJM Interconnection, L.L.C. (Aug. 18, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20260818/20260818-item-02---overlap-of-large-load-co-located-load-and-load-with-btmg---presentation.pdf [https://perma.cc/XQ8A-M3PU].

[87] *See August 18 Co-Located Load Order Workshop Stakeholder Feedback Poll Responses*, PJM Interconnection, L.L.C. (Aug. 18, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20260818/20260818-august-18-co-located-load-order-workshop-stakeholder-feedback-poll-responses-received-by-8-28-26-final.pdf [https://perma.cc/V7NB-9RR5].

Load Show Cause Order.[88] PJM solicited and received stakeholder feedback on its presentation.[89]

- **September 30, 2026, CLLOW**: PJM presented its proposed Large Load study process and received stakeholder feedback.[90]
- **October 5, 2026, CLLOW**: PJM presented and solicited feedback on certain draft Tariff redlines to comply with the June 2026 Orders PJM gave a presentation on proposed Eligible Load Curtailment priority by transmission service type.[91]
- **October 16, 2026, CLLOW:** PJM presented and solicited feedback on certain draft Tariff redlines to comply with the June 2026 Orders.[92]
- **October 26, 2026, CLLOW:** PJM presented on proposed Tariff redlines associated with its new transmission services.[93] PJM also discussed its

[88] *See* Donnie Bielak, *Show Cause for Large Loads Framework*, PJM Interconnection, L.L.C. (Sep. 16, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20260916/20260916-item-03---show-cause-for-large-loads-approach---presentation.pdf [https://perma.cc/YLW3-DGTK].

[89] *See September 16 Co-Located Load Order Workshop Stakeholder Feedback Poll Responses*, PJM Interconnection, L.L.C. (Sep. 16, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20260916/20260916-september-16-co-located-load-order-workshop-stakeholder-feedback-poll-responses-received-by-9-22-26.pdf [https://perma.cc/CM3H-E66H].

[90] Donnie Bielak, *Show Cause for Large Loads Framework*, PJM Interconnection, L.L.C. (Sep. 30, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20260930/20260930-item-02---show-cause-for-large-loads-approach---presentation.pdf [https://perma.cc/FB8W-CDDV].

[91] Chris Pilong, *Operationalizing Flexible Large Loads: Curtailment Overview*, PJM Interconnection, L.L.C. (Oct. 5, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261005/20261005-item-02---operationalizing-flexible-large-loads-curtailment-overview---presentation.pdf [https://perma.cc/FTM9-LLB6].

[92] *See Item 02 – Draft Tariff Revisions – Redline*, PJM Interconnection, L.L.C. (Oct. 15, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261016/20261016-item-02---draft-tariff-revisions---redline.pdf [https://perma.cc/K3V7-7G28] (presenting redline Tariff revisions at the October 16, 2026 CLLOW).

[93] *See, e.g.*, *Item 02 – Tariff Part XI New Transmission Services – Redlines*, PJM Interconnection, L.L.C. (Oct. 26, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---

proposed Fast Energization Process, which would require PJM to annually study all (i) generation and Merchant Transmission Interconnection requests; and (ii) Large Load and Long Term Firm Transmission Service requests in a single cluster over a 12-month period.[94] In Section III below, PJM describes its Fast Energization Process proposal and associated Tariff revisions in detail. Additionally, the Transmission Owners discussed proposed transmission rates, cost allocation, and a cost-recovery framework, to be separately filed.[95]

- **October 28, 2026, Markets and Reliability Committee**: PJM discussed its proposed response to the Large Load Show Cause Order, including its Fast Energization Process proposal.[96]
- **November 5, 2026, Special Members Committee**: PJM provided notice in accordance with Tariff, Part I, section 9.2(b) regarding its proposed Tariff

redlines.pdf [https://perma.cc/WF4R-RKYC] (presenting redline Tariff revisions at the October 26, 2026 CLLOW).

[94] Donnie Bielak, *Fast Energization*, PJM Interconnection, L.L.C. (Oct. 26, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-03---1-fast-energization---presentation.pdf [https://perma.cc/VSE5-5235].

[95] *See Notice of PJM Transmission Owners Consultation with the Members Committee Regarding Proposed Revisions to the PJM Tariff*, PJM Interconnection, L.L.C. (Oct. 9, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-04---pjm-to-large-load-mc-consultation-notice.pdf [https://perma.cc/MT5Z-GKR7].

[96] Donnie Bielak et al., *Large Load Show Cause Response*, PJM Interconnection, L.L.C. (Oct. 28, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/committees/mrc/2026/20261028/20261028-item-06---large-load-show-cause-response---presentation.pdf [https://perma.cc/58FJ-VLAZ].

revisions to comply with the June 2026 Orders,[97] including its Fast Energization proposal.[98]

- **November 6, 2026, TOA-AC**: PJM provided notice to the Transmission Owners in accordance with Tariff, Part I, section 9.2(b) regarding its proposed Tariff revisions to comply with the June 2026 Orders, including its Fast Energization proposal.[99]
- **November 12, 2026, CLLOW:** PJM discussed its proposed revisions to the Tariff and RAA to implement its Fast Energization proposal. PJM provided draft Tariff and RAA redlines to stakeholders for discussion.[100]

PJM intends to schedule additional stakeholder sessions after the submission of this filing to continue the process of education and discussion on the proposal submitted here. In particular, PJM is planning sessions on at least November 23, 2026, and December 15, 2026, to answer stakeholder questions and receive feedback.

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[97] *See Meeting Details*, PJM Interconnection, L.L.C. (Nov. 5, 2026), https://www.pjm.com/forms/registration/Meeting%20Registration.aspx?ID=%7b1045ffcd-c613-47d7-90be-24f2afa0c1c4%7d [https://perma.cc/N8TQ-ELZR] (November 5, 2026 Special Members Committee Meeting Materials).

[98] Donnie Bielak, *Fast Energization*, PJM Interconnection, L.L.C. (Nov. 5, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/committees/mc/2026/20261105-special/item-01---1-fast-energization---presentation.pdf [https://perma.cc/Z87G-9U6R].

[99] *See TOA-AC Meeting Agenda*, PJM Interconnection, L.L.C. (Nov. 6, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/committees/toa-ac/2026/20261106-special/agenda.pdf [https://perma.cc/FK73-PBGQ].

[100] *See, e.g.*, *Item 02 – Tariff Part XI New Transmission Services – Redlines*, PJM Interconnection, L.L.C. (Nov. 11, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261112/20261112-item-02---tariff-revisions-part-xi-new-transmission-services-november-11-draft---redline.pdf [https://perma.cc/7VBQ-P2RQ]; *Item 02 – RAA Schedule 8 – Redlines,* PJM Interconnection, L.L.C. (Nov. 11, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261112/20261112-item-02---raa-revisions-schedule-8-november-11-draft--redline.pdf [https://perma.cc/579S-MCKS].

III. OVERVIEW OF PROPOSED CHANGES

A. Part III—NITS

PJM is proposing certain changes to the terms and conditions of NITS in Part III to ensure that PJM is appropriately studying, planning, and upgrading the Transmission System for Large Load growth. Currently, there is no limit on a Network Customer's load growth when taking NITS, including for Large Load.[101] Under the current process, PJM plans the Transmission System based on the yearly load forecast, including adjustments to account for Large Loads.[102] To promote efficiency and transparency for Large Load additions, PJM is proposing the new Fast Energization study process in Part VIII as discussed below.[103] However, certain changes to Part III are needed to ensure that Large Load is captured in that study process.

1. NITS quantity for Large Load

PJM is proposing to add language to capture the existing level of NITS being provided to Network Customers serving Large Loads. In this regard, Part III would now specify that "[t]he amount of Regional Network Integration Transmission Service provisioned to Network Customers for serving Large Loads are at levels specified in an effective Service Agreement or, if not specified therein, as reflected on the Large Load Registry per the terms of the Reliability Assurance Agreement, Schedule 11.B.1."[104] The RAA now requires all Large Load in the PJM Region to be registered as of March 1,

[101] *See, e.g.*, Tariff, Part III, section 31.6.

[102] *See generally* RAA, Schedule 8 (setting Unforced Capacity Obligations based on Obligation Peak Load with Load Adjustments); Operating Agreement, Schedule 6 (specifying procedures for PJM's Regional Transmission Expansion Plan ("RTEP") Protocol).

[103] *See infra* Section III.B.

[104] Attachment A-1, Proposed Tariff, Part III, General.

2027.[105] This addition to Part III is necessary to set a baseline of the Large Load currently being served via NITS to allow PJM to study future Large Load additions.

2. Information updates

The Tariff currently provides for Network Customers to provide PJM with annual updates on its Network Load and Network Resources forecasts, consistent with the information provided in its Application for NITS, including any information provided under Tariff, Part III, section 29.2(ix) pursuant to the Transmission Provider's planning process in Operating Agreement, Schedule 6, but does not require the Network Customer to file an Application for those changes.[106] Because NITS is available to Eligible Customers taking service on behalf of Eligible Load, PJM is proposing to add language to clarify that the annual information updates Network Customers provide must include changes to Eligible Load and, as applicable, the Eligible Generating Facility serving that load.[107] Further, PJM's Tariff remains unchanged in that the Network Customer must provide PJM with timely notice of material changes relating to the Network Customer's Network Load (including any Network Load that is Large Load), and the Network Customer's Transmission System or other aspects of its facilities or operations affecting PJM's ability to provide reliable service.[108] This obligation, in tandem with the obligation

[105] *PJM Interconnection, L.L.C.*, 197 FERC ¶ 61,019, at P 48; *PJM Interconnection, L.L.C.*, Thirty-Day Compliance Filing to the Commission's October 9, 2026 Order on PJM's Large Load Definition and Large Load Registry, Docket No. ER26-3515-002 (Nov. 9, 2026).

[106] *See* Tariff, Part III, section 31.6.

[107] Attachment A-1, Proposed Tariff, Part III, section 31.6.

[108] *Id.*

to also update the Large Load Registry means that PJM and others will have a clearer picture of the Large Load on its system.[109]

Going forward, Large Load growth for NITS customers will require an Application to be studied through the Fast Energization Process.[110] Accordingly, PJM is proposing to strike the language in section 31.6 that suggests an Application would not be required for such changes (i.e., "[e]ven if an Application is no longer required").[111]

3. 50 MW limit on netting Behind the Meter Generation

The Commission directed PJM to allow Eligible Customers with Retail BTMG to net up to 50 MW of Retail BTMG from their load, subjection to certain exclusions for a three-year transition provision, to grandfather existing commercial arrangements, and for Cogeneration Facilities with load that follows the facility.[112] Consistent with this directive, PJM is proposing a revised definition of Retail BTMG that eliminates the rejected 50 MW nameplate limit and other netting exemptions from the definition.[113] In addition, PJM is proposing revisions to Part III, section 34.2 and Schedule 8 of the RAA to implement the 50 MW netting limit.[114]

Currently, there is no limit to Retail BTMG's daily load reduction for purposes of calculating capacity requirements under the RAA or transmission service charges under

[109] RAA, Schedule 11.B.1 (accepted in *PJM Interconnection, L.L.C.*, 197 FERC ¶ 61,019, at P 48)..

[110] *See infra* Section III.B.

[111] Attachment A-1, Proposed Tariff, Part III, section 31.6.

[112] Co-Location Order, 195 FERC ¶ 61,209, at PP 207, 220.

[113] Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – R - S) (adding the definition of "Retail Behind The Meter Generation"); Proposed Tariff, Part VIII, Subpart A, section 400, Definitions R.

[114] Attachment A-1, Proposed Tariff, Part III, section 34.2; Proposed Tariff, RAA, Schedule 8.

the Tariff.[115] Any load that is served by operating BTMG is simply not included in the daily load of the Network Customer.[116] Pursuant to the Commission's directive,[117] PJM is proposing revisions to section 34.2 that would limit the daily load reduction from Retail BTMG to 50 MW effective March 16, 2027 based on the status of the BTMG as of December 18, 2025, unless an exemption applies.[118] As directed, PJM has included three exemptions from the netting limit. First, the 50 MW limit would not apply for a three-year transition period for existing Retail BTMG that was used to serve load as of December 18, 2025.[119] Second, the 50 MW netting limit would not apply to Retail BTMG that was owned, operated and/or contracted for as of December 18, 2025, for the current term remaining under any contract to effectuate the Retail BTMG arrangement (including any renewal, amendment, or extension per the contract's terms).[120] To qualify for this exemption, the retail load served by the Retail BTMG must be on the Large Load Registry, the Retail BTMG must be registered with the Transmission Provider in accordance with the PJM Manuals, and the Network Customer must comply with any requests for information to verify eligibility.[121]

PJM is proposing that the load be added to the Large Load Registry and that Retail BTMG be registered to track utilization of the netting exemptions for settlement and

[115] Tariff, Part III, section 34.2 ("The daily load of a Network Customer does not include load served by operating Behind The Meter Generation.").

[116] Tariff, Part III, section 34.2.

[117] Co-Location Order, 195 FERC ¶ 61,209, at PP 207, 220.

[118] Attachment A-1, Proposed Tariff, Part III, section 34.2(B).

[119] Attachment A-1, Proposed Tariff, Part III, section 34.2(C).

[120] Attachment A-1, Proposed Tariff, Part III, section 34.2(D).

[121] Attachment A-1, Proposed Tariff, Part III, section 34.2(D).

resource planning purposes. The 50 MW netting limit will not apply to a Cogeneration Facility (consistent with the requirements of the Public Utility Regulatory Policies Act of 1978) that is integrated with the retail load it serves such that if the Cogeneration Facility trips offline, the retail load follows.[122] To qualify, the retail load must be on the Large Load Registry, the Retail BTMG must be registered, the Network Customer must certify eligibility, the Network Customer must comply with requests for information to verify eligibility, and the Network Customer must update PJM in the event it no longer qualifies for the exemption.[123] PJM also reserves the right to periodically audit compliance with these requirements.[124]

To effectuate the netting limit for the purpose of capacity cost allocation, PJM is proposing changes to RAA, Schedule 8 to incorporate the netting limits into the calculation of Obligation Peak Load for purposes of determining the Unforced Capacity Obligations.[125] Currently, the Daily Unforced Capacity Obligation of a Party to the RAA is calculated by taking the Party's Obligation Peak Load and applying scaling factors.[126] The Obligation Peak Load is calculated by taking the daily summation of the Party's weather adjusted coincident summer peak for the last Delivery Year for the end-users in the Zone, net of BTMG.[127] Because PJM is proposing to limit BTMG netting to 50 MW except in specific circumstances, PJM is proposing to add language in RAA, Schedule 8 to

[122] Attachment A-1, Proposed Tariff, Part III, section 34.2(E).

[123] Attachment A-1, Proposed Tariff, Part III, sections 34.2(E)(a)-(e).

[124] Attachment A-1, Proposed Tariff, Part III, section 34.2(F).

[125] Attachment A-1, Proposed Tariff, RAA, Schedule 8.

[126] RAA, Schedule 8(A).

[127] RAA, Schedule 8(A).

incorporate those netting limits into the Obligation Peak Load calculation for settlement and planning purposes.[128]

B. Part VIII—Fast Energization Process

Consistent with the Commission's directives to establish a study process for Large Load and to avoid duplicating system reinforcements for generator interconnection and transmission service for Large Loads,[129] and with PJM's strategic objectives,[130] PJM proposes to evaluate requests for Transmission Service on behalf of Eligible Loads and Large Loads as part of its Tariff, Part VIII procedures for studying the interconnection of Generating Facilities and Merchant Transmission and the provision of Long Term Firm Transmission Service. PJM further proposes new reforms to Tariff, Part VIII to speed up the studies, increase readiness requirements, and increase certainty as to responsibility for upgrades. PJM calls the resulting process the "Fast Energization Process," as it is designed both to get Generating Facilities online quickly and provide transmission service to Eligible Loads and Large Loads efficiently through a single, one-year process.

1. The Fast Energization Process is designed for speed and accuracy.

The Fast Energization Process would supplant the current interconnection process's three System Impact Study phases with an accelerated Screening Phase and a single System Impact Study.[131] This shift from three System Impact Studies to one will greatly expedite the interconnection process. The one System Impact Study in the Fast Energization

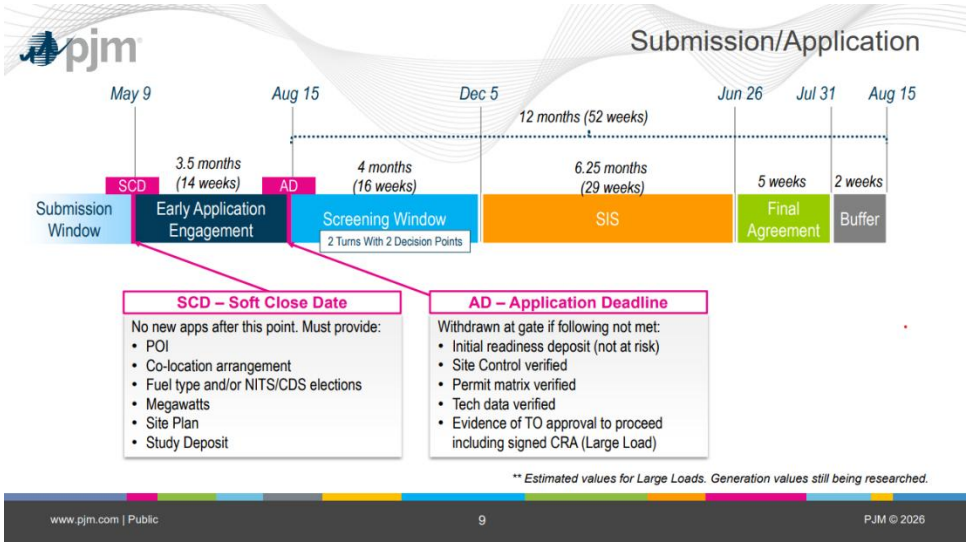
[128] Attachment A-1, Proposed RAA, Schedule 8(A).

[129] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 60.

[130] *See supra* Section I discussion of PJM's Five-Year Strategy and its objectives.

[131] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401 (Applications for Cycle Process Introduction); Proposed Tariff, Part VIII, Subpart C, section 404(B)(1) (Introduction); Proposed Tariff, Part VIII, Subpart C, section 405(B) (Phase I or Screening Phase); Proposed Tariff, Part VIII, Subpart C, section 409 (Phase III or System Impact Study Phase).

Process is preceded by a Screening Phase, during which PJM and Transmission Owners will provide two "turns" of system impact analysis with preliminary desk-side estimates for system upgrade costs and construction durations.[132] After each of these turns of analysis, there will be a Decision Point—a period during which Project Developers and Eligible Customers can choose whether or not to proceed and, if they are proceeding, commit Readiness Deposits.[133] This accelerated Screening Phase will extend for approximately four months, thereby providing two quick rounds of analysis that each take less than 60 days and get actionable information to Project Developers and Eligible Customers quickly.[134]



[132] Attachment A-2, Proposed Tariff, Part VIII, Subpart C, section 404(B)(1) (Introduction); Proposed Tariff, Part VIII, Subpart C, section 405(B) (Phase I or Screening Phase); Proposed Tariff, Part VIII, Subpart C, section 409 (Phase III or System Impact Study Phase).

[133] Attachment A-2, Proposed Tariff, Part VIII, Subpart C, section 404(B)(1) (Introduction); Proposed Tariff, Part VIII, Subpart C, section 406(C) (Decision Point I); Proposed Tariff, Part VIII, Subpart C, section 408(C) (Decision Point II).

[134] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 63 (directing PJM to explain whether the Tariff remains just and reasonable without processes for a study deadline of no more than 60 to 90 calendar days).

The Fast Energization Process will create additional time savings by having the Final Agreement Phase begin at the same time the System Impact Study Phase begins.[135] The process will also be expedited by imposing higher readiness requirements in the Application and having Readiness Deposits posted with the Applications and at risk at Decision Points I and II, earlier in the interconnection process than they currently are.[136] Higher and earlier readiness requirements and Readiness Deposits will better screen out speculative projects and ensure that projects that advance through the Fast Energization Process and enter into an interconnection-related service agreement are truly ready to start construction of their facility, complete construction, and get their facility in service.[137]

Finally, PJM has been and plans to continue to make investments in automation and technology to facilitate expediting the interconnection process. As described in the Bielak Declaration, PJM has been evaluating Tapestry, an AI-powered interconnection platform, and is close to the point at which it can trust results produced by the platform without parallel human verification.[138] This evaluation and PJM's own significant automation efforts have given PJM the confidence to work on developing a suite of automation that will enhance existing technology applications and also deploy technologies into new areas.[139] PJM is focusing particularly on improving its modeling platform, to turn

[135] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart D, section 411(C)(1) ("The Final Agreement Negotiation Phase shall run concurrently with the System Impact Study Phase.").

[136] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart A, sections 401(D)(1)-(3) (Required Study Deposits and Readiness Deposits); Proposed Tariff, Part VIII, Subpart C, section 406(C) (Decision Point I); Proposed Tariff, Part VIII, Subpart C, section 408(C) (Decision Point II).

[137] Bielak Decl. ¶ 7.

[138] Bielak Decl. ¶ 19.

[139] Bielak Decl. ¶ 19.

around grid studies more quickly, and on developing quality assurance tools to continue to drive high quality study results in a shorter period of time.[140]

2. The Fast Energization Process includes a Soft Close Date and Early Application Engagement to improve the quality of Applications and reduce disputes and litigation.

The Fast Energization Process includes a 14-week period between the Soft Close Date and the Application Deadline, called the Early Application Engagement, during which PJM will work with Applicants to improve their Applications.[141] This collaborative process will include PJM testing and giving feedback on Applicants' models, and giving guidance as to readiness.[142] This will result in cleaner Applications that can be validated quickly, thereby reducing disputes and litigation, with time-saving benefits for all concerned, including the Commission.[143]

3. Timing of Fast Energization Process implementation and the interim period

PJM proposes to implement the Fast Energization Process once the current Cycle reaches the end of Decision Point II, consistent with the current Tariff timeline for opening a new Cycle.[144] PJM thus proposes to open the Submission Window for the Fast Energization Process the next Business Day after Decision Point II of Cycle 01 ends.[145]

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[140] Bielak Decl. ¶ 19.

[141] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 400 Definitions E (defining Early Application Engagement); Proposed Tariff, Part VIII, Subpart B, section 403(E)(2) (Early Application Engagement, Kickoff Calls, and Scoping Meetings).

[142] Attachment A-2, Proposed Tariff, Part VIII, Subpart B, section 403(E)(2) (Early Application Engagement, Kickoff Calls, and Scoping Meetings).

[143] *See* Bielak Decl. ¶ 20.

[144] *See* Tariff, Part VIII, Subpart B, section 403(A) (under the current Cycle process, PJM opens the Application window for the next Cycle when the current Cycle reaches Phase III).

[145] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(A) ("Part VIII of the Tariff applies . . . to valid Eligible Customer for Load Requests, submitted on or after the next Business Day after the close of Decision Point II of Cycle 01.").

This is expected to be late November 2027.[146] At that time, all the pending Applications submitted for Cycle 02 under the existing process will be re-submitted for new Cycle 02 under the Fast Energization Process.[147] Opening the Submission Window in late November 2027 would result in a Soft Close Date in early May 2028,[148] followed by Early Application Engagement,[149] and an Application Deadline for the new Cycle 02 in August 2028.[150] The first Fast Energization Cycle would therefore finish in 2029.

During the interim period until the Fast Energization Process is in effect, PJM will use the Necessary Studies process, as directed in the Co-Location proceedings.[151] Once the Fast Energization Process is in effect, all Eligible Customer requests for transmission service to serve load, including Co-Located Load, will proceed through the Fast Energization Process.[152]

[146] *See* Stacey Nestel, *Cycle 01 Application*, PJM Interconnection, L.L.C., 2 (Jan. 2026), https://www.pjm.com/-/media/DotCom/committees-groups/subcommittees/ips/2026/20260126/20260126-item-05---cycle-1-application-requirements-and-nextgen-process.pdf [https://perma.cc/6RJL-DWPF].

[147] Attachment A-2, Proposed Tariff, Part VIII, Subpart C, section 404(A)(8). Requests to transfer Capacity Interconnection Rights in existing Cycle 02 Applications will be carried over to the new Cycle 02. *Id*.

[148] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 400 (Definitions S) (Soft Close Date).

[149] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 400 (Definitions E) (Early Application Engagement).

[150] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 400 (Definitions A) (Application Deadline).

[151] December Order, 193 FERC ¶ 61,217, at P 226; Co-Location Order, 195 FERC ¶ 61,209, at P 284.

[152] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(H)(3)(a) (effective 12/31/9998) ("[P]lanned modifications that include the addition of an Eligible Load or Large Load configuration must be studied as part of the Fast Energization process set forth in this Tariff, Part VIII.").

4. PJM is eschewing parallel processes, to streamline for speed and accuracy.

As part of the effort to streamline for speed, PJM proposes to eliminate Replacement Generation Interconnection Service.[153] Replacement Generation Interconnection Service was developed to address the delay in processing Generation Interconnection Requests during the transition from the old, serial process to the current clustered Cycle process.[154] That delay was particularly a problem for generators seeking to transfer Capacity Interconnection Rights from a deactivating resource to a New Service Request, because Capacity Interconnection Rights must be transferred within one year of deactivation of a resource.[155] With the Fast Energization Process taking only a year, there will no longer be a need for Replacement Generation Interconnection Service as a separate parallel process. Parallel processes, despite their value and benefit, increase complexity and tend to slow down processing; therefore PJM proposes to limit their use.[156]

PJM also proposes to return the Necessary Studies process to its former role of addressing modifications to projects covered by existing, effective service agreements once the Fast Energization Process is in effect,[157] as Eligible Loads and Eligible Generation can be studied more comprehensively through the main study process and do not need another separate parallel study process. PJM proposes to add the same Necessary Studies process

[153] Attachment A-2, Proposed Tariff, Part VIII, Subpart J, sections 437(A)-(B) (requiring Replacement Generation Interconnection Service Requests to be made prior to the next Business Day after the close of Decision Point II of Cycle 01).

[154] Bielak Decl. ¶ 14.

[155] *See* Tariff, Part VIII, Subpart E, section 426(C)(3).

[156] Bielak Decl. ¶¶ 15, 18. Along those lines, PJM also intends to open a stakeholder process in the first or second quarter of 2027 to explore improvements to Surplus Interconnection Service, another parallel process that has a negative impact on processing speed.

[157] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(H)(3)(a) (effective 12/31/9998).

for studying Eligible Customer-driven modifications to existing, effective Transmission Service Agreements for changes to the characteristics of Eligible Load and Large Load to the Necessary Studies process, however, as such changes require study to protect the Transmission System.[158]

5. PJM will maintain transparency of its study results

PJM will continue to identify the system reinforcements needed to interconnect Generating Facilities and provide transmission service to loads, the drivers of those reinforcements and their capital costs. PJM's studies will use a proportional impact methodology, consistent with Order No. 2023.[159] And PJM will post information regarding the reinforcements and their drivers and capital costs at the end of each Cycle on pjm.com in a publicly accessible, searchable format.[160] The allocation and recovery of those costs is in the control of the Transmission Owners because they have filing rights as to cost allocation, cost recovery, and rate design.

C. Part XI—New Transmission Services

1. Interim NITS

Consistent with the Commission's directive to make the new transmission services available to Eligible Customers serving load with BTMG,[161] PJM is proposing in Part XI, Subpart A to offer Interim NITS to Eligible Customers serving "Eligible Load," which

[158] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(H)(3)(a) (effective 12/31/9998).

[159] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart C, section 404.

[160] *See, e.g.*, Attachment A-2, Proposed Tariff, Part VIII, Subpart C, section 409(B)(2) (requiring System Impact Study results to be publicly available on PJM's website).

[161] Co-Location Order, 195 FERC ¶ 61,209, at P 91.

encompasses both Co-Located Load and load with BTMG.[162] PJM is also making Interim NITS available to Large Loads.[163] The Part XI, Subpart A largely adopts the terms and conditions proposed during the paper hearing process in Docket No. EL25-49-000,[164] but in a streamlined, reorganized format and with certain Commission-directed changes and other clarifications. The Commission generally found in the Co-Location Order that the Interim NITS rules PJM had proposed were just and reasonable.[165]

Section 701 describes the general nature of Interim NITS and restrictions on its use.[166] Interim NITS is a transmission service that allows Eligible Customers serving Eligible Load or Large Load to utilize head room on the system as-available on an interruptible basis to a specific Delivery Point while awaiting the completion of system upgrades necessary to provide full NITS.[167] Interim NITS is an energy-only service (i.e., it is not capacity backed).[168] Interim NITS is not available to Eligible Customers serving Eligible Load or Large Loads with FCD or NFCD Transmission Service.[169] In addition, Interim NITS may not be utilized by Eligible Customers to serve loads other than the designated Eligible Load or Large Load.[170] Finally, PJM reserves the right to curtail

[162] Attachment A-1, Proposed Tariff, Part XI, Subpart A, sections 700-03; Proposed Tariff, Part I, Definitions – E - F (Eligible Load).

[163] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 701.1.

[164] *See generally* PJM Initial Brief, Attachment A (Illustrative Language for New Tariff, Part XI; Attachments F-3A and F-4; and Other Illustrative Tariff Revisions) (Feb. 23, 2026); PJM Reply Brief, Attachment A (Redlines on Reply Brief to Illustrative Language for New Tariff, Part XI; Attachments F-3A and F-4; and Other Illustrative Tariff Revisions).

[165] *See* Co-Location Order, 195 FERC ¶ 61,209, at PP 263-68, 571.

[166] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 701.

[167] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 701.1.

[168] *See* Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 701.2.

[169] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 701.3.

[170] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 701.4.

Interim NITS, consistent with Good Utility Practice, for the purpose of making upgrades, modifications, or repairs to Transmission Owner or Generation Owner lines, substations, generators, or facilities or to respond to adverse system conditions.[171]

Section 702 lays out the requirements for initiating Interim NITS.[172] Eligible Customers may apply for Interim NITS at the same time as NITS by submitting an Application pursuant to the procedures in Part VIII.[173] The Transmission Service Agreement for Interim NITS is in the form provided in Attachment F-3A.[174] Such eligible Customers must also meet conditions precedent for service including complying with the PJM Credit Policy, executing a Transmission Service Agreement with operational procedures and necessary control technologies to limit withdrawals from the system, and certifying that the Eligible Customer is willing and able to limit withdrawals from the Transmission System for the Eligible Load when directed by Transmission Provider, and constructing any facilities on the customer's side of the Delivery Point to receive the delivery of energy.[175] Consistent with the Co-Location Order,[176] PJM clarified that Interim NITS will terminate and be converted automatically to NITS once the Transmission Provider performs an analysis to verify the system can accommodate the firm load and updates its internal systems to reflect the relevant upgrades needed to provide the requested

[171] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 701.5.

[172] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 702.

[173] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 702.1.

[174] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 702.2.

[175] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 702.3.

[176] Co-Location Order, 195 FERC ¶ 61,209, at P 571.

level of service on a firm basis.[177] The language concerning performing an updated analysis and updating the relevant internal system updates was added to clarify that the conversion does not happen automatically the moment upgrades are physically complete but must first be reflected in PJM's internal systems. In addition to termination for conversion to NITS, Interim NITS may be terminated to the extent the Eligible Load or Large Load is disqualified from receiving service pursuant to Part XI, Subpart C, section 719.5 due to multiple failures to follow Curtailment directives or misoperation of necessary control technologies.[178] Interim NITS may also be terminated to the extent an Eligible Customer is in breach of its obligations under the Transmission Service Agreement (e.g., failure to update Transmission Provider regarding material changes to the Eligible Load or Large Load).[179] Finally, Interim NITS may be terminated on another date mutually agreed by the parties.[180]

Consistent with the allocation of filing rights between PJM and Transmission Owners,[181] PJM understands the Transmission Owners have filed transmission rates for

[177] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 702.4(a); Proposed Tariff, Attachment F-3A.

[178] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 702.4(b).

[179] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 702.4(c).

[180] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 702.4(d).

[181] CTOA, Rate Schedule FERC No. 42; *see also Atl. City Elec. Co*., 190 FERC ¶ 61,109, at P 3 (2025) (providing history and authority for the CTOA under *Pennsylvania-New Jersey-Maryland Interconnection*, 105 FERC ¶ 61,294 (2003) ("*Atlantic City Settlement Order*"), *order on compliance*, 108 FERC ¶ 61,033 (2004) by explaining that "[i]n the *Atlantic City Settlement Order*, the Commission explained that the settlement agreement essentially divides filing rights between 'rate-related filings and terms and conditions-related filings – with the PJM [Transmission Owners] filing the former and PJM the latter'"); *Atl. City Elec. Co.*, 190 FERC ¶ 61,109, at P 4 ("[I]ndividual transmission owners do not have a right to file under FPA section 205 to modify 'terms and conditions of the PJM Tariff'. . . ."); *Atl. City Elec. Co. v. FERC*, 295 F.3d 1, 6 (D.C. Cir. 2002) (explaining that the initial Settlement Agreement between PJM and Transmission Owners "established procedures for changes to rate design and other tariff terms for transmission services. It permitted the transmission owners to file changes in transmission service rate design and non-rate terms and conditions to the tariff under section 205.").

Interim NITS.[182] In addition to such rates, Eligible Customers taking Interim NITS on behalf of Eligible Load or Large Load will be assessed certain other charges that are within PJM's filing authority, consistent with the charges assessed to loads taking NITS.[183] Accordingly, PJM would assess Eligible Customers taking Interim NITS on behalf of Eligible Load or Large Load:

- administrative services charges under Schedule 1A, Schedule 9, and Schedule 10 of the Tariff;[184]
- Ancillary Services charges in accordance with Part I, section 3;[185]
- Black Start Service charges in accordance with Tariff, Schedule 6A;[186]
- any redispatch costs as set forth in Tariff, Attachment K;[187] and
- any applicable Transmission Enhancement Charges in accordance with Tariff, Schedule 12.[188]

2. Contract Demand Transmission Service

Part XI, Subpart B, sections 708 through 711 and 714 through 715 provide the terms and conditions for the Contract Demand Transmission Services.[189] As explained in section 708, Contract Demand Transmission Service allows an Eligible Customer to take transmission service on behalf of Eligible Load or Large Load that is willing and able to

[182] *PJM Interconnection, L.L.C.*, PJM Transmission Owners' Partial Compliance Filing, Docket No. ER26-3537-000 (Aug. 17, 2026).

[183] *See* Co-Location Order, 195 FERC ¶ 61,209, at P 573.

[184] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 703.4.

[185] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 703.4.

[186] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 703.4.

[187] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 703.2.

[188] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 703.4.

[189] Attachment A-1, Proposed Tariff, Part XI, Subpart B, sections 708-11, 714-15.

limit withdrawals from the Transmission System.[190] FCD Transmission Service provides energy and capacity up to a specified, defined MW level.[191] NFCD Transmission Service provides energy procured by Transmission Provider on an as-available basis up to a specified, predetermined level.[192]

To be eligible for Contract Demand Transmission Service, any given Eligible Load or Large Load cannot be served by Interim NITS or NITS or have a pending Application for the same.[193] To prevent toggling between FCD Transmission Service and NFCD Transmission Service to avoid capacity costs, an Eligible Customer shall not be eligible to take NFCD Transmission Service on behalf of any given portion of an Eligible Load or Large Load it previously served with FCD Transmission Service for five years following the effective date of the relevant Transmission Service Agreement.[194] As with Interim NITS, Contract Demand Transmission Service may not be used for sales of energy or capacity to loads other than the Eligible Load or Large Load designated in the Transmission Service Agreement.[195] Also, Transmission Provider may Curtail Contract Demand Transmission Service, consistent with Good Utility Practice, to make or support upgrades, modifications, or maintenance to Transmission Owner or Generation Owner lines,

[190] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 708(a).

[191] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 708(b).

[192] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 708(b).

[193] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 709.3. This approach is consistent with the Commission's holdings that a customer cannot take NITS for only a portion of its load behind a delivery point. *See PJM Interconnection, L.L.C.*, 193 FERC ¶ 61,217, at P 196 (2025).

[194] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 709.3.

[195] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 709.4.

substations, and equipment or as needed due to adverse conditions on the Transmission System.[196]

To initiate Contract Demand Transmission Service on behalf of a designated Eligible Load or Large Load, the Eligible Customer must apply pursuant to the procedures in Tariff, Part VIII.[197] Note that even to the extent an entity intends to serve Eligible Load or Large Load entirely through Co-Located Generation and does not wish to take Transmission Service, the entity must still apply and take service for zero MW pursuant to a Transmission Service Agreement to account for the provision of ancillary services.[198] The Transmission Service Agreement for Contract Demand Transmission Service is in the form provided in Attachment F-4.[199]

Eligible Customers must meet the following conditions precedent to receive Contract Demand Transmission Service: (i) make a valid request pursuant to Part VIII; (ii) verify that the designated Eligible Load or Large Load has not been served by an Eligible Customer taking NITS or Interim NITS or applied for such service on behalf of the load; (iii) the Eligible Customer has complied with the PJM Credit Policy; (iv) the Eligible Customer has executed a Transmission Service Agreement in the form provided in Attachment F-4, which includes operational procedures and necessary control technologies to limit energy withdrawals; (v) the Eligible Customer is in compliance with all applicable technical requirements; (vi) the Eligible Customer constructed any facilities on its side of the Delivery Point necessary to receive the delivery of energy; (vii) the Eligible Customer

[196] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 709.5.

[197] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 710.1.

[198] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 710.1.

[199] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 710.2.

has completed any necessary certification requirements in accordance with the PJM Manuals; (viii) the Eligible Customer has executed the PJM Governing Agreements; and (ix) in the case of an Eligible Load served by an Eligible Generating Facility, the Eligible Customer verifies that no portion of the Eligible Generating Facility dedicated to serving the Eligible Load has Capacity Interconnection Rights.[200]

Contract Demand Transmission Service will generally continue without expiration, but may be terminated in certain circumstances.[201] First, Contract Demand Transmission Service may be terminated to the extent an incumbent Eligible Customer is being replaced by a successor Eligible Customer.[202] Second, an Eligible Customer may terminate FCD Transmission Service by providing PJM with 42 months' notice prior to the commencement of the Delivery Year.[203] Third, Contract Demand Transmission Service may be terminated to the extent the Eligible Load or Large Load is disqualified from receiving service pursuant to Part XI, Subpart C, section 719.5 due to multiple failures to follow Curtailment directives or misoperation of necessary control technologies.[204] Fourth, the Eligible Customer is in breach of its obligations under the Transmission Service Agreement (e.g., failure to update Transmission Provider regarding material changes to the Eligible Load or Large Load).[205] Fifth, Contract Demand Transmission Service may be terminated on another date mutually agreed by the parties.[206] Sixth, NFCD Transmission

[200] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 710.3.

[201] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 711.

[202] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 711(a).

[203] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 711(b).

[204] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 711(c).

[205] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 711(d).

[206] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 711(e).

Service may be terminated when system upgrades necessary to provide FCD Transmission Service are completed and placed in service.[207]

Consistent with the allocation of rights between PJM and Transmission Owners,[208] PJM understands the Transmission Owners will be making a separate filing transmission rates for FCD Transmission Service and NFCD Transmission Service. In addition to such rates, Eligible Customers will be assessed other charges Contract Demand Transmission Service that are within PJM's filing authority. Accordingly, PJM will assess Eligible Customers taking FCD Transmission Service on behalf of Eligible Load or Large Load:

- administrative services charges under Schedule 1A, Schedule 9, and Schedule 10 of the Tariff, based on the total quantity of megawatt-hours ("MWh") of FCD Transmission Service specified in the Transmission Service Agreement, except in the case of any capacity-related charges under these schedules, which shall be based on the Eligible Customer's Unforced Capacity Obligation;[209]

- Ancillary Services charges, except for Regulation, based on the total quantity in MWhs of FCD Transmission Service specified in the Transmission Service Agreement in accordance with Part I, section 3;[210]

- Regulation charges based on gross demand of the Eligible Load;[211]

- Black Start Service charges based on the gross demand in accordance with Tariff, Schedule 6A;[212]

- any redispatch costs as set forth in Tariff, Attachment K;[213] and

[207] Attachment A-1, Proposed Tariff, Part XI, Subpart B, section 711(f).

[208] *See supra* note 95.

[209] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 714.5.

[210] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 714.5.

[211] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 714.5.

[212] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 714.5.

[213] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 714.3.

- any applicable Transmission Enhancement Charges in accordance with Tariff, Schedule 12.[214]

For Eligible Customers taking NFCD Transmission Service on behalf of Eligible Load or Large Load, PJM would assess:

- administrative services charges under Schedule 1A, Schedule 9, and Schedule 10 of the Tariff, based on the total quantity of MWhs of reserved NFCD Transmission Service, except any capacity-related charges under these schedules will not apply;[215]

- Ancillary Services charges, except for Regulation, based on the total quantity in MWhs of reserved NFCD Transmission Service in accordance with Tariff, Part I, section 3;[216]

- To the extent the Eligible Customer does not have an effective Transmission Service Agreement for FCD Transmission Service, Black Start Service charges based on the gross demand in accordance with Tariff, Schedule 6A;[217]

- any redispatch costs as set forth in Tariff, Attachment K;[218] and

- To the extent the Eligible Customer does not have an effective Transmission Service Agreement for FCD Transmission Service, Regulation charges based on the gross demand of the Eligible Load or Large Load.[219]

3. Common service provisions for Interim NITS and Contract Demand Transmission Services

As proposed, Tariff, Part XI, Subpart C now provides the common service provisions for Part XI transmission services including requirements for control technologies, protection schemes, technical requirements, and facility construction. Service under Part XI is conditioned upon the Eligible Customer constructing, maintaining,

[214] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 714.5.

[215] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 715.4.

[216] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 715.4.

[217] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 715.4.

[218] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 715.2.

[219] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 715.4.

and operating the facilities and necessary control technologies and protection systems to take service and ensure that the Eligible Customer limits its withdrawals from the system.[220] Those necessary control technologies may include fully redundant special protection schemes in accordance with the PJM Manuals.[221] Necessary control technologies and special protection schemes must be developed in accordance with the PJM Manuals and consistent with Transmission Owner technical requirements and may be modified from time to time.[222] In addition, Eligible Customers must meet the relevant technical requirements for service including the installation of necessary hardware and software to limit energy withdrawals, provisioning an operations center and qualified personnel, and demonstration of operational control.[223]

Consistent with the Commission's directive,[224] PJM revised the Curtailment language to clarify the relative priority for the various services.[225] FCD Transmission Service will be treated as equivalent to NITS and Firm Point-to-Point Transmission Services for purposes of Curtailment.[226] Interim NITS, NFCD Transmission Service, and Non-Firm Point-to-Point Service will be treated as equivalent for purposes of Curtailment.[227] Transmission Provider will prioritize reservations for Curtailment based on their contribution to exceedances of system limits as specified in the PJM Manuals.[228]

[220] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 716.

[221] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 717.

[222] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 717.

[223] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 718.1.

[224] Co-Location Order, 195 FERC ¶ 61,209, at P 555.

[225] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 719.

[226] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 719.2.

[227] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 719.4.

[228] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 719.4.

As directed,[229] PJM also added language to specify that Eligible Customers subject to Curtailment may use a Co-Located Generating Facility to serve Co-Located Load provided the facility either has not obtained interconnection service yet or the facility is not a Capacity Resource.[230] Consistent with the Co-Location Order,[231] PJM added language in section 719.5 and to the Part I definition of Curtailment to clarify that with respect to Tariff, Part XI, its Curtailment authority includes the authority to curtail Interim NITS and NFCD Transmission Service for capacity or reserve shortages.[232]

Consistent with the Commission's directive,[233] PJM revised the operational penalties for failure to follow dispatch instructions or misoperation of control technologies.[234] Eligible Customers taking Interim NITS or Contract Demand Transmission Service are subject to operational penalties in the event that the Eligible Customer's necessary control technology or protection system scheme misoperates.[235] After one instance of misoperation, the Eligible Customer will be prohibited from taking transmission service or otherwise withdrawing energy from the Transmission System pursuant to the relevant Transmission Service Agreement for a period up to 120 days from misoperation, which may be shortened or extended per mutual agreement.[236] The up to 120-day pause pending evaluation of the misoperation of the necessary control technology

[229] Co-Location Order, 195 FERC ¶ 61,209, at P 576.

[230]Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 705.2.

[231] Co-Location Order, 195 FERC ¶ 61,209, at P 551.

[232] Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – C - D); Proposed Tariff, Part XI, Subpart C, section 719.5.

[233] Co-Location Order, 195 FERC ¶ 61,209, at PP 516, 523-24, 527.

[234] *See* Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 719.5.

[235] Attachment A-1, Proposed Tariff, Part XI, Subpart C, sections 719.5(a)-(b).

[236] *See* Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 719.5(b).

or protection system scheme is consistent with NERC requirements for an investigation into the operation of a Remedial Action Schemes (e.g., PRC-004-6 and PRC-012-02).[237] Such a pause in service will allow PJM (and the affected Transmission Owner(s), as necessary) time to investigate, identify, and implement necessary fixes to better protect the Transmission System, while respecting the Eligible Customer's desire to retain this type of service based on its promised willingness to limit energy withdrawals. In the event a necessary control technology or protection system misoperates a second time, the Eligible Customer's Transmission Service Agreement for that Eligible Load shall be terminated.[238] Similarly, Eligible Customers that fail to respond to established Load Shedding and Curtailment procedures shall be prohibited from taking service under the relevant Transmission Service Agreement for a period of up to 120 days.[239]

4. Pro Forma Service Agreement for Interim NITS (Attachment F-3A)

Because Interim NITS is by definition a temporary service that will convert into NITS, the *pro forma* service agreement is a combined Interim NITS/NITS agreement for Eligible Customers taking Interim NITS or NITS on behalf of Eligible Loads or Large Loads.[240] Any Eligible Customer taking these services on behalf of Eligible Loads or Large Loads would execute Attachment F-3A.[241] In addition to the general terms carried over

[237] *PRC-004-6 – Protection System Misoperation Identification and Correction*, North American Electric Reliability Corporation (June 12, 2025), https://www.nerc.com/globalassets/standards/reliability-standards/prc/prc-004-6.pdf [https://perma.cc/EV9E-JYWQ]; *PRC-012-2 – Remedial Action Schemes*, North American Electric Reliability Corporation (June 12, 2025), https://www.nerc.com/globalassets/standards/reliability-standards/prc/prc-012-2.pdf [https://perma.cc/9KFL-HHNU].

[238] *See* Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 719.5(b).

[239] *See* Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 719.5(a).

[240] Attachment A-1, Proposed Tariff, Part XI, Subpart A, sections 701.1, 702.4(a).

[241] Attachment A-1, Proposed Tariff, Attachment F-3A. The existing *pro forma* NITS Service Agreement is located at Tariff, Attachment F-3.

from the *pro forma* NITS Service Agreement (Attachment F-3), PJM has added terms specific to Interim NITS and serving Eligible Loads and Large Loads. When an Eligible Customer takes Interim NITS while awaiting upgrades for NITS, Attachment F-3A specifies that NITS will not commence until the necessary upgrades are complete, Transmission Provider has performed an updated analysis to verify the Transmission System can accommodate the firm load, and the Transmission Provider has updated the relevant systems pursuant to its internal procedures.[242] Because PJM will have to ensure the Transmission System can accommodate the specific Eligible Load or Large Load being served by the Eligible Customer, Attachment F-3A requires certain details about that load to be specified in the Agreement. Attachment F-3A requires the specific Eligible Load or Large Load being served to be identified, the load's gross demand to be specified, and, as applicable, information regarding the Eligible Generating Facility serving the load to be listed, including its Maximum Facility Output.[243] The Eligible Customer is also required to specify a Delivery Point for Interim NITS and submit a single-line diagram.[244]

Because Interim NITS requires the Eligible Customer to be willing and able to limit withdrawals from the system, Attachment F-3A includes terms to implement such limitations. First, Attachment F-3A specifies the amount of Interim NITS provided[245] and requires the Eligible Customer to certify that it is willing and able to limit its usage of the Transmission System consistent with the terms of the Agreement and when requested by

[242] Attachment A-1, Proposed Tariff, Attachment F-3A, sections 2.0-3.0.

[243] Attachment A-1, Proposed Tariff, Attachment F-3A.

[244] Attachment A-1, Proposed Tariff, Attachment F-3A, Specifications for Interim Regional NITS, section 1.0; Proposed Tariff, Attachment F-3A, Schedule A.

[245] Attachment A-1, Proposed Tariff, Attachment F-3A, Specifications for Interim Regional NITS, section 1.0.

the Transmission Provider.[246] The Agreement also includes a placeholder to list the necessary control technologies and operational practices that will be required prior to the commencement of Interim NITS.[247] Finally, the agreement prohibits the Eligible Customer from making any material modifications to the load being served without the Transmission Provider's prior written agreement.[248] To the extent modifications to the Load Facility are planned, the Agreement requires the Eligible Customer to provide PJM notice to allow PJM to initiate the Necessary Studies process.[249] In the event PJM determines that a planned modification would have a permanent material impact on the Transmission System or would constitute a material modification, Network Customer shall then withdraw the proposed modification or proceed with a new Eligible Customer for Load Request for the modification.[250] Finally, the Agreement provides that if an Eligible Customer fails to timely inform the Transmission Provider of or obtain Transmission Provider's written agreement for a material change in (i) the demand characteristics of the Load Facility; or (ii) the supply characteristics of the Eligible Generating Facility may constitute a breach to the Agreement and the Agreement may be terminated.[251]

[246] Attachment A-1, Proposed Tariff, Attachment F-3A, section 4.0.

[247] Attachment A-1, Proposed Tariff, Attachment F-3A, Specifications for Interim Regional NITS, sections 4.0-5.0.

[248] Attachment A-1, Proposed Tariff, Attachment F-3A, section 4.0.

[249] Attachment A-1, Proposed Tariff, Attachment F-3A, section 4.0.

[250] Attachment A-1, Proposed Tariff, Attachment F-3A, section 4.0.

[251] Attachment A-1, Proposed Tariff, Attachment F-3A, section 4.0.

5. Pro Forma Service Agreement for Contract Demand Transmission Service (Attachment F-4)

Attachment F-4, the *pro forma* agreement for Contract Demand Transmission Service, governs both FCD and NFCD Transmission Services.[252] Attachment F-4 is the *pro forma* agreement for Eligible Customers taking FCD or NFCD Service on behalf of Eligible Loads or Large Loads.[253] Any Eligible Customer taking these services on behalf of Eligible Loads or Large Loads would execute Attachment F-4.[254] In addition to the general terms carried over from the *pro forma* NITS Service Agreement (Attachment F-3), PJM has added terms specific to Contract Demand Transmission Service and serving Eligible Loads and Large Loads. When an Eligible Customer takes NFCD Transmission Service while awaiting upgrades for FCD Transmission Service, Attachment F-4 specifies that FCD Transmission Service will not commence until the upgrades are complete, Transmission Provider has performed an updated analysis to verify the Transmission System can accommodate the firm load, and the Transmission Provider has updated the relevant systems pursuant to its internal procedures.[255] Like with Interim NITS, because PJM will have to ensure the Transmission System can accommodate the specific Eligible Load or Large Load being served by the Eligible Customer, Attachment F-4 requires certain details about that load to be specified in the Agreement. Attachment F-4 requires the specific Eligible Load or Large Load being served to be identified, the load's gross demand to be specified, and, as applicable, information regarding the Eligible Generating

[252] Attachment A-1, Proposed Tariff, Attachment F-4.

[253] Attachment A-1, Proposed Tariff, Part XI, Subpart B, sections 708(a), 710.3(iv).

[254] Attachment A-1, Proposed Tariff, Attachment F-4; Proposed Tariff, Part XI, Subpart B, sections 708(a), 710.3(iv).

[255] Attachment A-1, Proposed Tariff, Attachment F-4, sections 2.0-3.0.

Facility serving the load to be listed, including its Maximum Facility Output.[256] The Eligible Customer is also required to specify a Delivery Point for the Contract Demand Transmission Service and submit a single-line diagram.[257]

Because Contract Demand Transmission Service requires the Eligible Customer to limit withdrawals from the system (as with Interim NITS), Attachment F-4 includes terms to implement such limitations. First, Attachment F-4 specifies the amount of FCD Transmission Service and NFCD Transmission Service being provided[258] and requires the Eligible Customer to certify that it is willing and able to limit its usage of the Transmission System consistent with the terms of the Agreement and when requested by the Transmission Provider.[259] The Agreement also includes a placeholder to list the necessary control technologies and operational practices that will be required prior to the commencement of service.[260] Finally, the agreement prohibits the Eligible Customer from making any material modifications to the load being served without the Transmission Provider's prior written agreement.[261] To the extent modifications to the Load Facility are planned, the Agreement requires the Eligible Customer to provide PJM notice to allow PJM to initiate the Necessary Studies process.[262] In the event PJM determines that a

[256] Attachment A-1, Proposed Tariff, Attachment F-4, Specifications for Contract Demand Transmission Service, sections 2.0-3.0.

[257] Attachment A-1, Proposed Tariff, Attachment F-4, Specifications for Contract Demand Transmission Service, section 1.0; Proposed Tariff, Attachment F-4, Schedule A.

[258] Attachment A-1, Proposed Tariff, Attachment F-4, Specifications for Contract Demand Transmission Service, section 1.0.

[259] Attachment A-1, Proposed Tariff, Attachment F-4, section 5.0.

[260]Attachment A-1, Proposed Tariff, Attachment F-4, Specifications for Contract Demand Transmission Service, sections 4.0-5.0.

[261] Attachment A-1, Proposed Tariff, Attachment F-4, section 4.0.

[262] Attachment A-1, Proposed Tariff, Attachment F-4, section 4.0.

planned modification would have a permanent material impact on the Transmission System or would constitute a material modification, Network Customer shall then withdraw the proposed modification or proceed with a new Eligible Customer for Load Request for the modification.[263] Finally, the Agreement provides that if an Eligible Customer fails to timely inform the Transmission Provider of or obtain Transmission Provider's written agreement for a material change in (i) the demand characteristics of the Load Facility; or (ii) the supply characteristics of the Eligible Generating Facility may constitute a breach of the Agreement and the Agreement may be terminated.[264]

D. Re-Filing Co-Located Load Compliance Changes

A number of proposed changes in this filing address compliance directives from the Co-Location Order and were previously filed on August 17, 2026.[265] PJM filed a motion with the Commission earlier today seeking leave to withdraw that filing in favor of this one due to the overlapping nature of many of the changes.[266] A number of the proposed changes from the August 17 Filing are being re-filed here. Attachment D provides a chart detailing where each directive from the June 2026 Orders is addressed in this filing.[267]

1. Prohibition on serving Co-Located Load from existing generators

The Co-Location Order directed PJM to explain in its compliance filing how its changes will prohibit Interconnection Customers from serving Co-Located Loads from new and existing generators until all necessary Network Upgrades, control technologies

[263] Attachment A-1, Proposed Tariff, Attachment F-4, section 4.0.

[264] Attachment A-1, Proposed Tariff, Attachment F-4, section 4.0.

[265] *See* August 17 Filing.

[266] *PJM Interconnection, L.L.C.*, Motion to Withdraw Filing and Terminate Proceeding in Deference to New Docket of PJM Interconnection, L.L.C., Docket No. ER26-1479-002 (Nov. 16, 2026).

[267] *See generally* Attachment D, Chart Mapping Order Directives to Tariff Changes.

and/or protection systems, and metering are complete and in service.[268] This FPA section 205 filing fulfils PJM's compliance obligations and obviates the need for a separate compliance filing by proposing to add Necessary Study references and provisions to Parts I, III, VI, and VII, and to direct Generation Project Developers seeking to serve Co-Located Load with an existing Co-Located Generating Facility to the Necessary Study process in Part VIII, Subpart A, section 401(H)(3).[269] In its Sixty-Day Compliance Filing, PJM proposed to add language to Part VIII for the Necessary Study process to preclude a Project Developer from implementing any planned modifications to its facilities until the Necessary Studies are completed and the amended GIA reflecting the results of such studies is fully executed and effective; the Sixty-Day Compliance Filing also provided that service to the Co-Located Load could not begin until "all required Network Upgrades, necessary control technologies and protection systems, and metering identified as necessary are complete and in service."[270] Thus, the Tariff would now require that all Interconnection Customers and Generation Project Developers seeking to serve Co-Located Load, whether with existing or new Generating Facilities: (1) provide advance written notice to PJM and the relevant Transmission Owner; (2) go through the Necessary Study process in Part VIII of the Tariff; and (3) not begin serving Eligible Load until the

[268] Co-Location Order, 195 FERC ¶ 61,209, at P 285.

[269] *See* Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – L-M-N) (adding the definitions of "Necessary Study" and "Necessary Studies Agreement"); Proposed Tariff, Part III (General) (addition of notice requirement); Proposed Tariff, Part VI, Subpart B, section 212 (same); Proposed Tariff, Part VII, Subpart A, section 301(A)(7)(c) (same).

[270] Sixty-Day Compliance Filing, Proposed Tariff Revisions (Attachments A & B), Part VIII, Subpart A, sections 401(H)(3)(a), 401(H)(3)(b)(iii). In this filing, PJM proposes to further clarify in Proposed Tariff, Part VIII, the Necessary Study process by amending the listing of required and necessary equipment changes to instead reference "the entire scope of work required under that . . . Generation Interconnection Agreement." Proposed Tariff, Part VIII, Subpart A, section 401(H)(3)(d). This ensures that all items determined to be necessary and therefore captured in the amended GIA are complete before the Project Developer may begin serving Eligible Load.

entire scope of the work under their GIA as amended after the Necessary Study process is complete. These combined revisions ensure that all these entities are treated comparably and the prohibition on serving Co-Located Loads before all the necessary upgrades and equipment changes are complete is enforced across the board.[271]

2. Expansion of service to "Eligible Load" for load with BTMG

The Co-Location Order directed PJM to expand the availability of the December Order's new transmission services to Network Customers serving load with BTMG that are willing and able to limit their withdrawals from the Transmission System under certain circumstances.[272] The Commission directed PJM to either add a definition of "Eligible Load" or propose other changes to implement this directive.[273] Consistent with this directive, PJM is proposing to add the term Eligible Load to the Tariff to encompass both Co-Located Load and Load with BTMG.[274] To that end, PJM is proposing to add to the Tariff, Part I, section 1, Definitions the term "Eligible Load" defined as "Co-Located Load or load connected to Behind the Meter Generation."[275] Further consistent with the Commission's directive to propose other Tariff changes necessary to expand the

[271] PJM also proposes herein formatting and language changes to the Necessary Study provisions in Part VIII, Subpart A, section 401(H)(3), to make clear that the Necessary Study process applies to all Project Developers that plan to make modifications to their facilities, "including but not limited to a Project Developer whose planned modifications include an Eligible Load configuration." Attachment A-1, Proposed Tariff, Part VIII, Subpart A, section 401(H)(3)(a). PJM further proposes minor, ministerial changes to Tariff, Part VIII to spell out the term "Generation Interconnection Agreement" and replace "PJM" with "Transmission Provider," as appropriate. *See, e.g.*, Attachment A-1, Proposed Tariff, Part VIII, Subpart C, section 408(A)(2)(e)(i)(j)(iv); Proposed Tariff, Part VIII, Subpart E, sections 414(B)(2), 414(B)(4)(c).

[272] Co-Location Order, 195 FERC ¶ 61,209, at P 91.

[273] Co-Location Order, 195 FERC ¶ 61,209, at P 91.

[274] Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – E - F) (adding the definition of "Eligible Load").

[275] Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – E - F) (adding the definition of "Eligible Load").

availability of these new services, PJM is proposing to add to the term "Eligible Generating Facility" to the Tariff to encompass both a Co-Located Generating Facility or Retail BTMG.[276] In addition, PJM is proposing conforming changes to replace "Co-Located Load" with "Eligible Load" and "Co-Located Generator" with "Eligible Generator" and other clarifying changes in Tariff Part I, section 1 (Definitions),[277] Part III (Network Integration Transmission Service),[278] Part VI (Administration and Study of New Service Requests),[279] Part VII (Transition Cycle Generation Interconnection Procedure),[280] Part VIII (New Rules Generation Interconnection Procedure),[281] Part IX (Forms of

[276] "'Eligible Load' shall mean Co-Located Load or load connected to Behind the Meter Generation. 'Eligible Generating Facility' shall mean a Co-Located Generating Facility or Behind the Meter Generation." Proposed Tariff, Part I, section 1 (Definitions – E - F) (defining "Eligible Load" and "Eligible Generating Facility").

[277] Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – O - P - Q) (updating the definition of "Provisional Interconnection Service" to reference "Eligible Load" instead of just "Co-Located Load").

[278] Attachment A-1, Proposed Tariff, Part III, section 28.1 (replacing "Co-Located Load" with "Eligible Load"); section 29.1 (allowing customers to take NITS on behalf of "Eligible Load" instead of "Co-Located Load"); Proposed Tariff, Part III, section 29.2 (replacing "Co-Located Load" with "Eligible Load" in Application procedures); Proposed Tariff, Part III, section 31.6 (replacing "Co-Located Load" with "Eligible Load" in annual load and resource information update).

[279] Attachment A-1, Proposed Tariff, Part VI, Subpart B, section 212 (adding language in Part VI, Subpart B, section 212 regarding the Necessary Study process in Part VIII for Generating Facilities to reference service to Eligible Loads).

[280] Attachment A-1, Proposed Tariff, Part VII, Subpart A, section 300, Definitions E (adding the definitions for "Eligible Load" and "Eligible Generating Facility"); Proposed Tariff, Part VII, Subpart A, section 300, Definitions P (revising the definition of "Provisional Interconnection Service" to reference "Eligible Generating Facility" and "Eligible Load").

[281] Attachment A-1, Proposed Tariff, Part VIII, Subpart A, section 400, Definitions E (adding the definitions for "Eligible Load" and "Eligible Generating Facility"); Proposed Tariff, Part VIII, Subpart A, section 400, Definitions P (updating the definition of "Provisional Interconnection Service" to reference "Eligible Generating Facility" and "Eligible Load"); Proposed Tariff, Part VIII, Subpart A, section 401 (revising the Application requirements to allow Eligible Generating Facilities serving Eligible Load and clarifying the Necessary Studies process applies to Eligible Load); Proposed Tariff, Part VIII, Subpart B, section 403 (revising the Application rules to allow Eligible Generating Facilities serving Eligible Load); Proposed Tariff, Part VIII, Subpart C, section 404 (updating the System Impact Studies to contemplate service to Eligible Load); Proposed Tariff, Part VIII, Subpart C, section 406 (updating the acceleration language to allow acceleration of new service requests for new facilities or increases the generation capability in existing facilities to serve Eligible Load); Proposed Tariff., Part VIII, Subpart C, section 408 (same); Proposed Tariff, Part VIII, Subpart E, section 413 (updating the language permitting service requests below the Maximum Facility Output for new facilities or increases the generation capability in existing facilities that will serve

Interconnection-Related Agreements),[282] and Part XI, Subpart A (Interim Network Integration Transmission Service).[283]

3. Elimination of new GIA requirement

PJM previously proposed to require all Eligible Customers that intend to serve Co-Located Load with a new or existing Co-Located Generating Facility to enter into a new GIA pursuant to Part VIII of the Tariff, which was revised to include additional details regarding the Necessary Studies process.[284] The Co-Location Order rejected this proposal for customers with existing service agreements and directed PJM to add language concerning the Necessary Study process to Tariff, Parts VI and VII to allow customers with existing service agreements to modify those agreements.[285] Accordingly, PJM is proposing changes to allow customers that obtained service agreements pursuant to Parts VI and VII to modify those agreements pursuant to the Necessary Study process in Part VIII.[286]

Eligible Load); Proposed Tariff, Part VIII, Subpart E, section 414 (updating the language to permit Surplus Interconnection Service for Eligible Load).

[282] Attachment A-1, Proposed Tariff, Part IX, Subpart A (Form of Application and Studies Agreement), section 1 (revising section 1 of the Application and Studies Agreement to collect Applicant information for an Eligible Generating Facility serving Eligible Load); Proposed Tariff, Part IX, Subpart A (Form of Application and Studies Agreement), section 3.17 (changing "PJM" to "Transmission Provider" and clarifying all transmission service requests in the PJM Region are subject to the same deliverability tests); Proposed Tariff, Part IX, Subpart B, GIA Appendices and Schedules, Schedule O (updating Schedule O to replace "Eligible Load" with "Eligible Generating Facility"); Proposed Tariff, Part XI, Subpart G, Necessary Studies Agreement (updating the Necessary Studies Agreement to reference "Eligible Load" and "Eligible Generating Facility").

[283] Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 700 (updating references to "Co-Located Load" to "Eligible Load"); Proposed Tariff, Part XI, Subpart A, section 701.1 (same); Proposed Tariff, Part XI, Subpart A, section 701.2 (same); Proposed Tariff, Part XI, Subpart A, section 701.3 (same); Proposed Tariff, Part XI, Subpart A, section 702.1 (same); Proposed Tariff, Part XI, Subpart A, section 702.4 (same); Proposed Tariff, Part XI, Subpart A, section 703 (same).

[284] *See* Co-Location Order, 195 FERC ¶ 61,209, at P 284; Attachment A-1, Proposed Tariff, Part VIII, Subpart A, section 401(H)(3).

[285] Co-Location Order, 195 FERC ¶ 61,209, at P 311.

[286] *See supra* note 58 concerning addition of Necessary Study language to Parts I, III, VI, and VII; Attachment A-1, Proposed Tariff, Part VIII, Subpart A, section 401(I). PJM also proposes to cross-reference Tariff, Part VIII, Subpart L, section 439, Provisional Interconnection Service, added in the Thirty-Day Compliance Filing, in Parts VI and VII to clarify that Provisional Interconnection Service is available to

For Interconnection Customers that utilized the Part VI process, because Part VI does not contain discrete definitions, PJM is revising the proposed definition of Co-Located Generating Facility in Part I to include an existing Customer Facility that is physically connected to Co-Located Load to incorporate the relevant terms from Part VI.[287] As explained above, to ensure that existing Interconnection Customers with effective Interconnection Service Agreements ("ISA") do not serve Co-Located Load until all necessary upgrades and equipment are in place,[288] PJM is also adding to the Co-Located Generating Facility definition a requirement to provide advance written notice to the Transmission Provider and Transmission Owner to initiate the Necessary Study process pursuant to Part VIII, Subpart A, section 401(H)(3)(b) to use a Customer Facility to serve Co-Located Load.[289] In addition, PJM is adding language to mirror this Necessary Study process requirement in Part VI, Subpart B, section 212.[290] Finally, PJM has updated the *pro forma* Necessary Studies Agreement to include language for Queue No., reference Part VI for ISAs, incorporate references to Interconnection Customers throughout, and

entities that obtained Interconnection Service under those Parts. *See* Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – O - P - Q) (updating the definition of "Provisional Interconnection Service"); Proposed Tariff, Part VII, Subpart A, section 300, Definitions P (same); Proposed Tariff, Part VIII, Subpart A, section 400, Definitions P (same).

[287] Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – C - D) (revising the definition of "Co-Located Generating Facility").

[288] Co-Location Order, 195 FERC ¶ 61,209, at P 285.

[289] Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – C - D) (adding to the definition of "Co-Located Generating Facility").

[290] Attachment A-1, Proposed Tariff, Part VI, Subpart B, section 212. PJM also proposes to add new Tariff, Part VIII, Subpart A, section 401(I) to clarify that Interconnection Customers with ISAs under Tariff, Part VI may utilize the Part VIII Necessary Study process and will be referred to as Project Developers or Generation Project Developers and their agreements referred to as GIAs when doing so.

reference Tariff, Attachment O, Appendix 2, section 3 in paragraph 5 concerning the purpose of the Necessary Studies.[291]

For Generation Project Developers that utilized the Part VII Transition Cycle Interconnection Process, PJM is proposing to modify the definition of Co-Located Generating Facility to include both an existing and planned Generating Facility.[292] Consistent with the proposed changes in Part VI, PJM is adding a requirement to provide Transmission Provider and Transmission Owner with advance written notice to initiate the Necessary Study process pursuant to Part VIII, Subpart A, section 401(H)(3)(b) in the event a Generation Project Developer with an effective GIA intends to use a Generation Facility to serve Co-Located Load.[293] PJM is also adding this advance notice requirement for the Necessary Study process to Tariff, Part VII, Subpart A, section 301(A)(7)(c).[294] Finally, PJM is proposing a definition of Co-Located Load that references the relevant terms for Part VII of the Tariff (i.e., Generating Facility and Project Developer).[295]

[291] Attachment A-1, Proposed Tariff, Part IX, Subpart G, Necessary Studies Agreement.

[292] Attachment A-1, Proposed Tariff, Part VII, Subpart A, section 300, Definitions C (definition of Co-Located Generating Facility).

[293] Attachment A-1, Proposed Tariff, Part VII, Subpart A, section 300, Definitions C (definition of Co-Located Generating Facility).

[294] Attachment A-1, Proposed Tariff, Part VII, Subpart A, section 301(A)(7)(c); Proposed Tariff, Subpart A, section 300, Definitions N.

[295] Attachment A-1, Proposed Tariff, Part VII, Subpart A, section 300, Definitions C.

4. Effective date only

In addition, PJM previously proposed compliance changes that were accepted in the Co-Location Order without an effective date.[296] Accordingly, PJM is re-filing the following Tariff records with a proposed effective date of March 16, 2027:

- Part I, section 1, Definitions – A-B (BTMG);[297]
- Part III, section 34.3 (Netting of Non-Retail BTMG);[298]
- Part VII, Subpart A, section 300, Definitions B (BTMG);[299]
- Part VIII, Subpart A, section 400, Definitions B (BTMG);[300] and
- Part VIII, Subpart A, section 400, Definitions N (Necessary Study).[301]

E. Changes to Be Addressed in Future Filings

PJM has identified certain changes to be addressed in future filings. PJM will need to amend Schedule 1 of the Operating Agreement to allocate Auction Revenue Rights to FCD Transmission Service customers and may need to make conforming changes to the RAA regarding Capacity Market and load forecast effects of the new services. If, after further stakeholder engagement or Commission direction, it appears prudent or necessary to further clarify this matter in a filing, PJM will do so.

[296] *See, e.g.*, Co-Location Order, 195 FERC ¶ 61,209, at P 207 n.519; Sixty-Day Compliance Filing at 35.

[297] Attachment A-1, Proposed Tariff, Part I, section 1 (Definitions – A - B) (updating the definition of "Behind the Meter Generation"); Co-Location Order, 195 FERC ¶ 61,209, at P 207 n.519.

[298] Attachment A-1, Proposed Tariff, Part III, section 34.3.

[299] Attachment A-1, Proposed Tariff, Part VII, Subpart A, section 300, Definitions B.

[300] Attachment A-1, Proposed Tariff, Part VIII, Subpart A, section 400, Definitions B.

[301] Attachment A-1, Proposed Tariff, Part VIII, Subpart A, section 400, Definitions N; Co-Location Order, 195 FERC ¶ 61,209, at P 280 n.670.

Other than the form of Necessary Studies Agreement, initially filed in the August 17 Filing,[302] that PJM is re-filing here because it will be needed in the interim period before the Fast Energization Process begins, PJM is not proposing to revise the forms of interconnection-related service agreements in Tariff, Part IX (e.g., the form of Application and Studies Agreement, the GIA, the Wholesale Market Participation Agreement, and others) in this filing. PJM plans to file revisions to those forms in a later, supplemental filing, once the Commission has ruled on or provided guidance concerning the Tariff revisions to Part VIII proposed herein. In that supplemental filing, PJM also will propose other revisions to the interconnection-related service agreement in Tariff, Part IX to streamline the service agreement negotiation and contracting process, based on lessons learned to date in the Transition Period and in Cycle 01 and on PJM's automation efforts. Finally, depending on the Commission's rulings or guidance on the cost recovery provisions the Transmission Owners are filing concurrently, PJM will need to add to the Tariff a form of agreement for PJM to hold Project Developers' post-commercial operation Security, as required to support the Transmission Owners' fees charged to Project Developers.[303]

PJM is filing separately today a motion for additional abeyance so that it can make these supplemental filings.

[302] August 17 Filing, Attachment A, Tariff, Part IX, Subpart G.

[303] *See* Attachment A-2, Proposed Tariff, Part VIII, Subpart D, section 411(C).

IV. THE COMMISSION SHOULD ACCEPT THE PROPOSED CHANGES AS JUST AND REASONABLE.

A. The Proposed Fast Energization Process Is Just and Reasonable and Advances the Commission's Categories for Reform in the June 2026 Orders

The Fast Energization Process is just and reasonable for four principal reasons. First, it is designed to address and promote meaningful improvement in response to real challenges facing the grid: insufficiently fast interconnection processes for load and generation, parallel and duplicative study processes, speculative requests, limited visibility into the drivers of transmission upgrades, and an ongoing resource adequacy shortfall. Second, it is built on a unifying design that studies generation and load together, shortens the process by half, and moves readiness and financial commitments to the front of the process to promote readiness to build. Third, it preserves the first-ready, first-served principle from recent interconnection study process reforms (consistent with Order No. 2023)[304] and adds greater transparency and cost certainty. Fourth, its core features track the directives of the Large Load Show Cause Order.[305] The Commission need not find that PJM's proposal is the only reasonable approach in order to accept it, only that PJM's proposal is a just and reasonable one.[306]

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[304] *Improvements to Generator Interconnection Procedures and Agreements*, Order No. 2023, 184 FERC ¶ 61,054, *limited order on reh'g*, 185 FERC ¶ 61,063 (2023), *order on reh'g & clarification*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024), *aff'd sub nom.*, *Advanced Energy United v. FERC*, 185 F.4th 186 (D.C. Cir. 2026).

[305] *See* Attachment D, Chart Mapping Order Directives to Tariff Changes, at 17-25.

[306] *Cities of Bethany v. FERC*, 727 F.2d 1131, 1136 (D.C. Cir. 1984) ("*Cities of Bethany*"); *see ISO New Eng. Inc.*, 114 FERC ¶ 61,315, at P 33 & n.35 (2006) (citing *Pub. Serv. Co. of N.M. v. FERC*, 832 F.2d 1201, 1211 (10th Cir. 1987); *Cities of Bethany* at 1136); *Oxy USA, Inc. v. FERC*, 64 F.3d 679, 692 (D.C. Cir. 1995) (citing *Cities of Bethany* at 1136); *cf. S. Cal. Edison Co.*, 73 FERC ¶ 61,219, at 61,608 n.73 (1995) ("Having found the Plan to be just and reasonable, there is no need to consider in any detail the alternative plans proposed by the Joint Protesters." (citing *Cities of Bethany* at 1136)).

B. Core Features of the Fast Energization Process That Enhance the Current Cycle Process

1. PJM's current process provides only some visibility into the transmission needs created by Large Loads

Under the current planning processes, transmission service for Large Loads is subsumed within PJM's RTEP. System reinforcements needed to serve Large Loads are identified through separate processes, including the Transmission Owners' processes (e.g., Attachment M-3 and Form 715 planning processes) and PJM's Do No Harm process, and are "trued up" as load interconnection projects are incorporated into the RTEP.[307] PJM's proposal provides more visibility into the transmission build-out driven by Large Loads so that PJM can ensure sufficient transmission capability exists in the timeframe in which a Large Load plans to come online. Studying transmission service together with generation interconnection will allow PJM and the Transmission Owners to be more transparent about the drivers of the reinforcements required to serve Large Loads.[308]

2. Resource Adequacy requires getting new generation online faster.

PJM continues to need additional generating capacity to maintain reliable service for the 67 million people in the PJM Region and to serve new Large Loads. As PJM's Five-Year Strategy recognizes, "in today's environment, reliability is not possible without resource adequacy."[309] The 2028/2029 Base Residual Auction Report shows that the shortfall of capacity supply needed to meet demand, plus an adequate reserve margin, has grown year over year, despite a net increase of 1,294.4 MW of Installed Capacity between

[307] Bielak Decl. ¶ 11.

[308] *Id.*

[309] *Shaping a Power Change: PJM Five-Year Strategy*, PJM Interconnection, L.L.C., 1 (Aug. 2026), https://www.pjm.com/-/media/DotCom/library/reports-notices/special-reports/2026/20260819-shaping-a-… [https://perma.cc/2RBY-MPLH].

the 2027/2028 and 2028/2029 auctions. New supply has not kept pace with rapid Large Load growth.[310]

Although PJM has 47 GW of generation with signed agreements, many of those projects are not being built or are slowed by state permitting and supply chain backlogs. The factor that PJM Planning can influence is the interconnection process.[311] Speeding up that process is therefore the most effective step PJM can take, because faster study results allow developers to shift their focus to more viable projects and may lessen or remove other barriers, such as permitting and siting approvals.[312]

3. Incremental and parallel fixes are not enough – a singular process for generation and transmission service requests yields efficiencies.

To facilitate the interconnection of additional generation capacity, PJM has already adopted the Expedited Interconnection Track, Replacement Generation Interconnection Service, and the Reliability Resource Initiative. These measures are beneficial but were designed largely to manage PJM's transition from the old serial queue process to the Cycle process, and a significant volume of Generation Interconnection Requests remains.[313] PJM seeks to avoid adding separate parallel processes for provisioning transmission service to Eligible Load and Large Load, having experienced the complications that parallel processes can cause. Moreover, Large Loads differ fundamentally from traditional load growth in size, pace, and concentration, and they are the only major source of load growth.[314] Limiting study of transmission service for Large Loads to a separate process

[310] Bielak Decl. ¶ 12.

[311] Bielak Decl. ¶ 13.

[312] Bielak Decl. ¶ 15.

[313] Bielak Decl. ¶ 14.

[314] Bielak Decl. ¶ 15.

from Generation Interconnection Requests would likely lead to a sub-optimal build-out of the Transmission System that would place unnecessary costs on existing loads.[315]

Studying new Generation Interconnection Requests and new Large Load transmission service requests together speeds up interconnection, helps ensure that new generation is deliverable to new Large Loads, allows the costs of needed transmission enhancements to be determined efficiently, and allows those costs to be accurately allocated to the cost causers.[316]

4. The Fast Energization Process is a single, unified process that should be twice as fast as the current process.

PJM proposes to consolidate Generation and Merchant Transmission Interconnection with Long-Term Firm and Large Load Transmission Service studies into a singular 12-month process. The process will take half the time of the Cycle process.[317] It replaces the three complete System Impact Studies of the current process with an accelerated screening window, consisting of two turns of system impact analysis and a single System Impact Study.[318] Each turn of the screening window provides planning-level estimates of the system reinforcements needed for the portfolio of generation projects and transmission service requests, called "Interconnection Reliability Reinforcements" ("IRR").[319] Each turn produces a non-binding good-faith estimate of the cost and the time

[315] Bielak Decl. ¶ 15.

[316] Bielak Decl. ¶ 16.

[317] Bielak Decl. ¶¶ 9, 17.

[318] Bielak Decl. ¶ 21.

[319] Bielak Decl. ¶ 21.

to construct the needed facilities within 60-90 calendar days.[320] Figure 1 illustrates the new process.

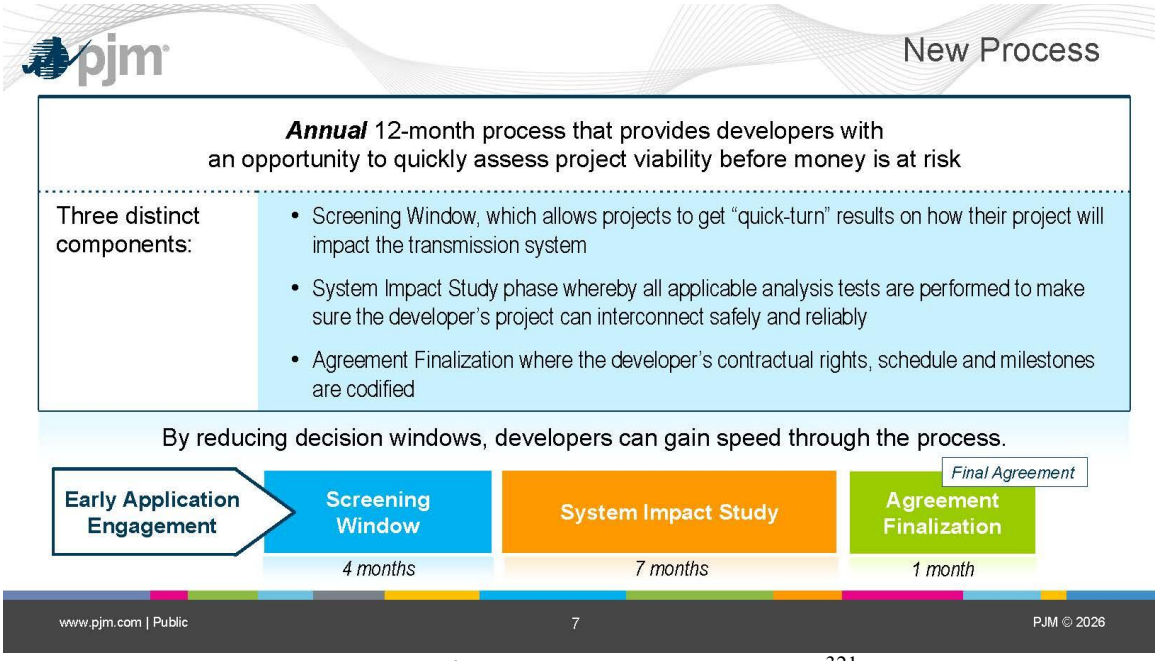


Figure 1: The Fast Energization Process[321]

The expedited screening window gives developers and customers solution feedback very early, while the decision points require a demonstration of readiness to proceed.[322]

5. Technology and early engagement speed the process.

PJM will use technology to speed up project data review, power flow and dynamic studies, and agreement drafting. PJM has been vetting Tapestry, an AI-powered interconnection platform, in its current process and is nearing the point at which it can trust the platform's results without parallel human verification.[323] PJM is also developing a suite of automation, including improvements to its modeling platform, analytics platforms

[320] Bielak Decl. ¶ 21.

[321] Bielak Decl. ¶ 21.

[322] Bielak Decl. ¶ 18.

[323] Bielak Decl. ¶ 19.

to turn around grid studies more quickly, and result interpretation and quality assurance tools to preserve study quality in a shorter period.[324]

The process also includes Early Application Engagement.[325] Between the Soft Close Date and the Application Deadline, PJM will answer Applicants' questions, test and provide feedback on their models, and help them complete their Applications.[326] This engagement should improve the quality of Applications, allow PJM's post-deadline review to be quick, reduce disputes over Application review, deficiency notices, and cure efforts, and produce more Applications for truly viable and ready projects.[327] The improvement is much needed: at present, only five percent of Applications submitted to PJM are correct and complete when first submitted.[328]

6. Study consolidation preserves study rigor

Faster does not mean less rigorous. The System Impact Study is the equivalent of the Phase III System Impact Study in the current Cycle process.[329] PJM will perform load flow, stability, and short circuit analyses across summer, winter, and light load scenarios and will ensure that all reliability issues are addressed and that the correct amount of transmission service has been provisioned.[330] Negotiation of service agreements begins during the System Impact Study Phase, which further reduces the total time needed.[331]

[324] Bielak Decl. ¶¶ 9, 19.

[325] Bielak Decl. ¶ 20.

[326] Bielak Decl. ¶ 20.

[327] Bielak Decl. ¶ 20.

[328] Bielak Decl. ¶ 20.

[329] Bielak Decl. ¶ 22.

[330] Bielak Decl. ¶ 22.

[331] Bielak Decl. ¶ 22.

7. Readiness requirements are moved to the front of the process.

The Fast Energization Process continues the current Cycle process's emphasis on readiness but moves many requirements into the Application rather than spreading them over three phases. The financial commitments are likewise moved up in time. Eligible Customers seeking transmission service on behalf of Large Loads must enter into a Transmission Owner Cost Recovery Agreement to enter the process.[332] Project Developers must submit Readiness Deposits in full with the Application, and those deposits become at risk at decision points in the Screening Phase.[333] Physical changes to projects and load are not allowed after Application, because they would require changes to the dynamic models submitted with the Application and the new process leaves no time to revise individual models and the cluster model. A developer or customer wishing to change its project or load must withdraw and resubmit in the next Cycle.[334]

These requirements screen out speculative projects and help ensure that projects that enter an interconnection-related service agreement are truly ready to start construction, complete construction and commissioning on a timely basis, and enter service.[335] They also preserve the first-ready, first-served paradigm of the current Cycle process.[336]

[332] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(A) ("To initiate an Eligible Customer for Load Request, an Eligible Customer must provide to Transmission Provider the relevant Transmission Owner or Electric Distributor authorization for the Eligible Customer for Load Request to be studied in the relevant Cycle, as well as an executed Cost Recovery Agreement with the relevant Transmission Owner.").

[333] Bielak Decl. ¶ 23.

[334] *Id.*

[335] Bielak Decl. ¶ 7.

[336] *Id.* ¶ 17.

8. A portfolio approach to system reinforcements provides transparency and certainty.

The Fast Energization Process moves PJM away from identifying specific upgrades and tying them to specific projects. PJM instead will analyze upgrades and reinforcements as enabling the entire Cycle cohort of generation projects and transmission service requests. The resulting IRRs are optimized for the whole Cycle, which eliminates overlapping or duplicative upgrades for generation and load. This approach also allows a fractional amount of generating capacity to become deliverable faster and with greater certainty, rather than only upon completion of all required Network Upgrades.[337]

Transparency. The Transmission Owners hold the filing rights for cost allocation and cost recovery and are addressing those matters in Tariff revisions filed concurrently. PJM will continue to provide transparency as to required system topology, the drivers of the need for the IRRs, and their capital costs. Consistent with the Large Load Show Cause Order, PJM will post this information on pjm.com in a single, accessible, searchable location.[338]

Certainty. Because Project Developers will be responsible for a share of the total cost of the portfolio of IRRs, rather than for specific upgrades, optimization should reduce both total cost and volatility in a developer's cost responsibility. If a Project Developer's cost responsibility nonetheless rises above the amount determined at Decision Point II, the Tariff now includes a certainty framework to limit exposure to the increase.[339] Figure 2 compares the current and new processes.

[337] Bielak Decl. ¶ 24.

[338] Bielak Decl. ¶ 25; Attachment A-2, Proposed Tariff, Part VIII, Subpart L, section 440(A)(2).

[339] Bielak Decl. ¶ 26.

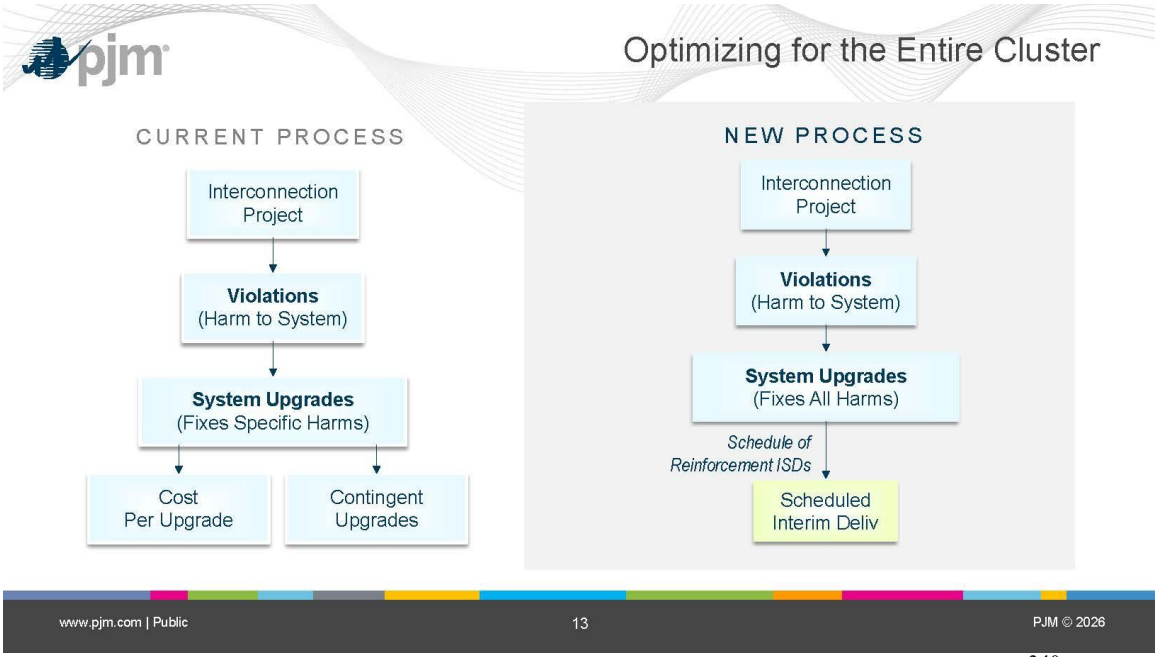


Figure 2: Current process compared with the Fast Energization Process[340]

9. Interim rights allow service to begin sooner.

Because PJM will not tie service to completion of specific "contingent upgrades," the final service agreements will include a schedule of interim deliverability for Project Developers or a schedule of interim withdrawal rights for Eligible Customers, based on the current Transmission System topology.[341] The schedules set a minimum level of injection or withdrawal rights based on the available studies and anticipated Transmission System conditions in future years.[342] PJM will then annually reassess and update the interim rights based on updated system conditions (i.e., as raise the MW value if more IRRs are built or queue projects withdraw).[343]

[340] Bielak Decl. ¶ 26.

[341] Bielak Decl. ¶ 27; Attachment A-2, Proposed Tariff, Part VIII, Subpart L, section 440(A)(1).

[342] Attachment A-2, Proposed Tariff, Part VIII, Subpart L, section 440(A)(1).

[343] Bielak Decl. ¶ 27.

C. The Fast Energization Process Is Consistent with the Large Load Show Cause Order's Directives.

In the Large Load Show Cause Order, the Commission preliminarily found that PJM's Tariff appears unjust and unreasonable without certain provisions and encouraged PJM to address those concerns through a section 205 filing.[344] The Fast Energization Process addresses the opportunities as summarized below and discussed in the following sections.

Large Load Show Cause Order opportunity	Fast Energization Process feature
Study transmission service for Eligible Customers on behalf of large loads clearly and consistently, within 60-90 days[345]	Single Tariff-defined process; two screening turns, each producing a non-binding good-faith estimate of cost and construction time within 60-90 calendar days; a single System Impact Study[346]
Application process with readiness requirements that deter speculative or duplicative requests[347]	Readiness requirements moved to the Application; Readiness Deposits submitted in full and at risk at decision points; Cost Recovery Agreement required to enter; no physical changes after Application; Early Application Engagement[348]
Transparency on Network Upgrade drivers and costs, posted in a single, accessible, searchable location[349]	PJM will post required system topology, the drivers of need, and capital costs on pjm.com in a single, searchable location[350]
Mitigate cost-shifting risk through a cost recovery agreement[351]	Transmission Owner Cost Recovery Agreement required of Eligible Customers for Large Load requests; Transmission Owners are addressing cost allocation and

[344] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 3, 38.

[345] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 41, 63.

[346] Bielak Decl. ¶¶ 17, 21-22; Attachment A-2, Proposed Tariff, Part VIII, Subpart C, section 404.

[347] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 59.

[348] Bielak Decl. ¶¶ 7, 18, 20, 23; Attachment A-2, Proposed Tariff, Part VIII, section 401-404.

[349] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 66-67, 71-76.

[350] Bielak Decl. ¶ 25.

[351] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 77-84.

Large Load Show Cause Order opportunity	Fast Energization Process feature
	recovery in their concurrent filing; Readiness Deposits for Project Developers[352]
Transmission services reflecting flexible large loads[353]	NITS, Interim NITS, NFCD Transmission Service, FCD Transmission Service schedules for Eligible Loads and Large Loads[354]
Generator interconnection that accounts for electrically proximate large load[355]	Generation and load studied together in one Cycle; IRRs optimized for the whole cohort; interim deliverability schedules[356]

1. Timely, clear, and consistent study of transmission service for large loads

One of the Commission's principal concerns was that PJM's Tariff lacked sufficiently clear and consistent provisions on how transmission service to Eligible Customers on behalf of large loads will be studied. The Commission concluded that a study process culminating in a report with a non-binding good-faith estimate of the cost and time to construct needed facilities should take no more than 60-90 calendar days.[357]

The Fast Energization Process addresses this concern by placing Large Load transmission service requests in the same defined, Tariff-based process as generation and long-term firm service. Each screening turn produces a non-binding good-faith estimate of cost and construction time within 60-90 calendar days, and the System Impact Study

[352] Bielak Decl. ¶¶ 23, 25; Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401.

[353] Bielak Decl. ¶ 27.

[354] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 85-87; Attachment A-1 Proposed Tariff, Part XI, Subpart A, section 700; Proposed Tariff, Part XI, Subpart B, section 708.

[355] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 88-101.

[356] Bielak Decl. ¶¶ 6, 10, 16, 24, 27; Attachment A-2, Proposed Tariff, Part VIII, sections 401, 404, 440.

[357] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 41, 50-51, 63.

then confirms that all reliability issues are addressed and that the correct amount of transmission service is provisioned.[358]

The Commission also recognized that the Transmission Owners may be primarily responsible for load studies and stated that it does not seek to alter the allocation of rights and responsibilities among PJM and the Transmission Owners.[359] The Fast Energization Process is consistent with that statement. It enhances PJM's own study process, and the Transmission Owners are submitting their cost allocation and cost recovery revisions separately, because they hold those filing rights.[360]

2. Readiness requirements that deter speculative requests

The Commission expressed concern that the Tariff fails to deter speculative or duplicative requests and observed that clear study procedures with readiness requirements, including meaningful milestones and financial commitments, can help ensure that requests are viable.[361] The Fast Energization Process accomplishes this objective. It moves readiness requirements and financial commitments into the Application,[362] requires a Transmission Owner Cost Recovery Agreement from Eligible Customers seeking service on behalf of Large Loads to enter the process,[363] places Readiness Deposits at risk at

[358] Bielak Decl. ¶¶ 10, 21-22.

[359] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 52.

[360] Bielak Decl. ¶ 25.

[361] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 56, 59.

[362] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(D)(1)(b).

[363] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(A).

decision points,[364] and bars physical changes after Application.[365] Early Application Engagement further improves the quality of Applications from the outset.[366]

3. Transparency regarding upgrades and their costs

The Commission preliminarily found that cost transparency measures are needed so that stakeholders, including state regulators, can understand the Network Upgrades, and their costs, needed to serve large loads.[367] It stated that this information should be posted on PJM's website in a single location, in an accessible and searchable format.[368] PJM will post the required system topology, the drivers of the need for the IRRs, and their capital costs on pjm.com in a single, accessible, and searchable location.[369] Studying generation and transmission service together also makes the drivers of reinforcements more visible.[370] Further, the Fast Energization Process will result in changes to the Large Load Adjustment process in PJM's load forecasting procedures, impacting the number of RTEP projects needed because of Large Loads that are then cost allocated to ratepayers generally.[371]

4. Protection against cost shifting

The Commission was concerned that, absent adequate mechanisms, costs incurred to serve large loads that do not materialize could be shifted to other transmission customers, and it preliminarily found that a cost recovery agreement with a minimum contribution and

[364] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(2A).

[365] Attachment A-2, Proposed Tariff, Part VIII, Subpart B, section 403.

[366] Bielak Decl. ¶¶ 18, 20, 23.

[367] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 71-76.

[368] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 66-67, 71-76.

[369] Bielak Decl. ¶ 25.

[370] *Id.* ¶ 11.

[371] Bielak Decl. ¶¶ 15, 24.

financial security appears necessary.[372] The Fast Energization Process requires Eligible Customers seeking service on behalf of Large Loads to enter into a Transmission Owner Cost Recovery Agreement as a condition of entering the process, and it requires Project Developers to post Readiness Deposits in full with their Applications.[373] Because the Transmission Owners hold the filing rights for cost allocation and cost recovery, they address those matters in their concurrent Tariff revisions.[374] The portfolio approach and the certainty framework also reduce the risk of cost swings during the process.[375]

At its core, the Fast Energization Process's cost allocation mechanism will address the cost allocation for incremental system adjustments necessary to meet reliability drivers and needs of the Process's transmission service and generation project clusters. There will no longer be any direct tie between an individual project (generation or transmission service) and specific "upgrade facilities."[376] Instead, what will be identified in the Fast Energization Process is the "percentage cost responsibility" based on a proportional impact method, consistent with Order No. 2023, as to the collective Cycle portfolio. Armed with this information, states pursuant to their retail rate authority may elect to cost allocate IRR among particular loads in each of their particular states. PJM's process therefore offers a means to "give state public utility commissions and other state regulators the information necessary to allow them to understand which transmission costs are caused by which

[372] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 66, 77-84.

[373] Bielak Decl. ¶ 23.

[374] *Id.* ¶ 25.

[375] *Id.* ¶¶ 17, 24, 26.

[376] Bielak Decl. ¶ 23.

transmission customers, so that they can sub-allocate these costs to the appropriate retail customers."[377]

5. Transmission services that reflect flexible use of the system

The Commission preliminarily found that new transmission services should be available to reflect the operational reality that some large loads are willing and able to limit their use of the Transmission System, including an interim service while Network Upgrades are constructed.[378] The Fast Energization Process provides for interim rights in the final service agreements.[379] For interim deliverability, the Transmission Provider will determine a schedule of the minimum injection and withdrawal limits based on anticipated Transmission System conditions that will then be reassessed with an annual study.[380] PJM estimates that it can begin provisioning these rights as proposed in 2029 after commencing Application and study processes later on in 2027.[381] These rights will be revised periodically to increase the minimums as IRRs are completed or projects withdraw.[382]

6. Studying generation and transmission service requests to serve Large Load together leverages technology and innovation.

The Commission recognized that studying new load and new generation together can present system benefits, speed interconnection, and enable more accurate and cost-effective transmission solutions, and it asked PJM to consider how its interconnection

[377] Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 70.

[378] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 85-87.

[379] Attachment A-2, Proposed Tariff, Part VIII, Subpart L, section 440(A).

[380] Attachment A-2, Proposed Tariff, Part VIII, Subpart L, sections 440(A)(1)-(2).

[381] *See supra* Section III.B.3.

[382] Bielak Decl. ¶ 27; Proposed Tariff, Part VIII, Subpart L, section 440(A)(2).

processes should reflect those benefits.[383] The Fast Energization Process is built on that premise. It studies generation, Merchant Transmission, Long-Term Firm, and Large Load Transmission Service requests in one Cycle. It optimizes the IRRs for the whole Cycle and eliminates overlapping or duplicative upgrades for generation and load. PJM identifies leveraging co-location and electrical proximity as one of the innovations of the process.[384] This integrated process will harness synergies in study results that reflect both transmission service and generation impacts, resulting in potentially lower Network Upgrade and IRR needs at early stages of the project life cycle.

Because of the unique characteristics of Large Load, it is essential for PJM to study Generation Interconnection Requests and Large Load Transmission Service requests together through the Fast Energization Process.[385] Large Loads are fundamentally different than traditional categories of load; they have significantly greater energy and capacity demands, these demands grow quickly, and the demand Large Loads are more geographically concentrated than from traditional loads.[386] Given these characteristics, the provision of new transmission service—on a firm basis—to Large Loads generally requires transmission enhancements or expansions. Large Loads are causing much of the load growth in the PJM Region and generation development is struggling to keep up,[387] which

[383] Large Load Show Cause Order, 195 FERC ¶ 61,211, at PP 88-91, 95-101.

[384] Bielak Decl. ¶¶ 6, 10, 16, 24.

[385] Bielak Decl. ¶ 16.

[386] Bielak Decl. ¶ 15; *see also* PJM's concurrently-submitted Section 205 filing relating to ride-through, other operational requirements, and the annual transmission services report and the related exhibits attached thereto, which is incorporated by reference into this filing.

[387] Bielak Decl. ¶¶ 12-13, 15.

poses unique challenges for the Transmission System.[388] PJM's current approach of evaluating interconnecting generation and providing transmission service to Large Load through distinct processes,[389] makes it difficult to optimally build out the Transmission System considering the new challenges posed by Large Load.[390]

Through the Fast Energization Process, PJM will holistically study the Transmission System impacts of generation and Large Load and optimize transmission enhancements that serve both simultaneously.[391] The efficiencies from this combined study process will speed up generation interconnection and ensure that generation is deliverable to new Large Loads, PJM selects Transmission System upgrades efficiently, and the causers of Transmission System upgrades pay for the costs.[392] Ultimately, this is a just and reasonable approach for evaluating how the transmission system needs to be updated to accommodate the transmission service needs of Large Loads in an efficient and cost effective manner.

7. PJM's proposal respects existing commercial arrangements and provides for a clear transition from the existing process to the Fast Energization Process.

In the interim period before the Fast Energization Process commences in full, PJM's proposed revisions to Tariff, Part VIII, Subpart A, section 401 set forth which transmission service requests will proceed under the existing planning regime and which

[388] *See* Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 58 ("[I]ntegrating large loads poses specific challenges to transmission system operation given their size, operational behavior, and unique potential to impact the transmission system.").

[389] Bielak Decl. ¶¶ 11, 13-14.

[390] Bielak Decl. ¶ 15.

[391] Bielak Decl. ¶ 16.

[392] Bielak Decl. ¶ 16.

service requests will proceed under the Fast Energization Process.[393] This framework provides transparency to the market as to what must be done, and by when. It respects existing commercial arrangements and affords a 13-month runway for arrangements in potential development but not yet finalized. Eligible Customers have more than 13-months' notice to "complete[] the applicable . . . retail load interconnection study" to be treated under legacy constructs, or be processed under the new Fast Energization Process.[394]

PJM specifically proposes a January 1, 2028 date for "completion" to accommodate the 2028 load forecast. Setting a January 1, 2028 date ensures that the planning done under the status quo process is included in Large Load Adjustments submitted to PJM and thus properly reflected in the load forecast.[395] The framework is also just and reasonable because "completion" is defined in terms of two objective criteria: one technical (retail load study completion date) and one legal (date of execution of required agreements by all applicable parties). Thus, under this framework, whether something has been "completed" is plainly understood, thus offering parties a path and timeline to develop plans.

PJM's proposal also enhances transparency consistent with the Commission's stated goals.[396] Those customers seeking transmission service on behalf of Large Loads must submit (or have others submit on their behalf) the information necessary to populate the Large Load Registry no later than 30 calendar days after the retail load interconnection

[393] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(A).

[394] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(A).

[395] Resource Adequacy Planning, *PJM Manual 19: Load Forecasting and Analysis*, PJM Interconnection, L.L.C., § 3 (rev. 39, June 30, 2026), https://www.pjm.com/-/media/DotCom/documents/manuals/m19.pdf [https://perma.cc/4M4A-UD9N]; *id.* § 3.1 ("The forecast is . . . released prior to each Planning Period, typically in January.").

[396] *See, e.g.*, Large Load Show Cause Order, 195 FERC ¶ 61,211, at P 76.

study is deemed "complete."[397] This requirement promotes timely and accurate disclosure to those parties with access to the Registry of all new Large Load requests prior to even coming into service. States, PJM, and other relevant stakeholders can inform decisions based upon these timely data submittals. Further, stakeholders can then follow the study results for such requests, including the costs eventually allocated to them.

Because of the value in ensuring planning under the existing process is reflected in the 2028 load forecast, the framework also provides for a streamlined and expedited dispute resolution framework to drive prompt clarity for Eligible Customers, PJM, and others about which requests will proceed under the Fast Energization Process.[398] If Tariff-established deadlines and information for initiating Alternative Dispute Resolution and seeking Commission relief are not honored, or if litigation is timely commenced and resolved, then Eligible Customers submitting service requests will know that they will proceed under the Fast Energization Process without delay, which will reduce the risk that the 2028 load forecast report is delayed.

D. The New Transmission Services Proposed in Part XI are Just and Reasonable.

PJM has proposed to implement the three new transmission services as directed by the Commission. PJM's proposed implementation of these new services is just and reasonable. PJM is proposing to make Interim NITS, FCD Transmission Service, and NFCD Transmission Service available to any Eligible Customer taking service on behalf

[397] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(A). *See also* RAA, Schedule 11,B.1 (accepted in *PJM Interconnection, L.L.C.*, 197 FERC ¶ 61,019, at P 48, filed on compliance in *PJM Interconnection L.L.C.*, Thirty-Day Compliance Filing to the Commission's October 9, 2026 Order on PJM's Large Load Definition and Large Load Registry, Docket No. ER26-3515-002 (Nov. 9, 2026).

[398] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, section 401(A).

of an Eligible Load or Large Load.[399] Because these services require an Eligible Customer to be willing and able to limit withdrawals from the Transmission System, PJM has proposed reasonable terms and conditions specific to these services. To ensure the reliability of the Transmission System, Eligible Customers taking these services will be required to meet technical requirements demonstrating their ability to limit their withdrawals as a condition precedent.[400] As part of these technical requirements, Eligible Customers must have necessary control technologies to limit their withdrawals from the Transmission System as specified in their Transmission Service Agreement, which may include protection schemes where appropriate.[401] The Transmission Service Agreement will also specify any necessary operating procedures.[402] Eligible Customers will also be required to demonstrate operational control to comply with instructions to reduce withdrawals from the system within five minutes when directed to do so.[403] Consistent with the Commission's directive,[404] to the extent an Eligible Customer fails to follow a Curtailment instruction or the necessary control technologies misoperate, PJM is proposing a 120-day pause in service after the first instance, and to terminate the relevant Transmission Service Agreement after the second instance.[405] Finally, PJM will be

[399] *See* Attachment A-1, Proposed Tariff, Part XI, Subpart A, section 700; Proposed Tariff, Part XI, Subpart B, section 708.

[400] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 718.

[401] Attachment A-1, Proposed Tariff, Part XI, Subpart C, sections 717, 718.1.

[402] Attachment A-1, Proposed Tariff, Attachment F-3A, Specifications for Interim Regional NITS, section 5.0; Proposed Tariff, Attachment F-4, Specifications for Contract Demand Transmission Service, section 5.0.

[403] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 718.1.

[404] Co-Location Order, 195 FERC ¶ 61,209, at PP 515, 519.

[405] Attachment A-1, Proposed Tariff, Part XI, Subpart C, section 719.5.

addressing ride-through requirements for Large Computational Load and other operational requirements for such loads in a separate filing being submitted today.

E. PJM's Proposed Changes to NITS are Just and Reasonable.

Consistent with the Commission's directives, PJM has proposed just and reasonable revisions to the terms and conditions for NITS to ensure that Large Load is appropriately studied for transmission service and accounted for in PJM's transmission planning processes.[406] PJM is proposing to quantify the current level of NITS being provided to Large Loads using the Large Load Registry.[407] When approving the Large Load Registry, the Commission recognized that it would "provide PJM with the information necessary to address the operational impacts of Large Loads on the PJM transmission system."[408] The proposal will therefore allow PJM to establish a baseline regarding the current level of NITS being provided to Network Customers serving Large Loads. PJM would then require an Eligible Customer to submit an application for any increase above the existing level of NITS for Large Loads.[409] To that end, PJM is proposing to strike the language in Tariff, Part III, section 31.6 that suggests an Application would not be required for changes reflected in these annual updates.[410] Striking this

[406] *See supra* Section III.A.

[407] Attachment A-1, Proposed Tariff, Part III, General ("The amount of Regional Network Integration Transmission Service provisioned to Network Customers for serving Large Loads are at levels specified in an effective Service Agreement or, if not specified therein, as reflected on the Large Load Registry per the terms of the Reliability Assurance Agreement, Schedule 11.B.1").

[408] *PJM Interconnection, L.L.C.*, 197 FERC ¶ 61,019, at P 48.

[409] Attachment A-2, Proposed Tariff, Part VIII, Subpart A, sections 400, Definitions E (defining Eligible Customer for Load Request as "a request by an Eligible Customer seeking Network Integration Transmission Service or Transmission Service on behalf of an Eligible Load or Large Load"); Attachment A-2, Proposed Tariff, Part VIII, Subpart C, sections 404(E).

[410] Attachment A-1, Proposed Tariff, Part III, section 31.6.

language clarifies PJM's proposal to require Large Loads that seek to grow above existing service levels to submit an Application to be studied through the Fast Energization Process.

Further, regarding BTMG, the Commission directed PJM to "create a materiality threshold that allows Network Customers to net from their Network Load up to 50 MW of load served by using BTMG at a single electrical location."[411] Consistent with that directive, PJM proposes revisions to Part III, section 34.2 and Schedule 8 of the RAA to implement the 50 MW netting limit effective December 18, 2025, unless an exemption applies.[412] PJM also proposes three exclusions to the 50 MW netting limit, as directed by the Commission.

First, the Commission directed PJM establish a transition period of three years for Network Customers currently using PJM's existing retail BTMG netting rules.[413] PJM therefore proposes to exempt existing Retail BTMG that was used to serve load as of December 18, 2025 (i.e., the date of the December Order) from the BTMG netting limit during a three-year transition period.[414]

Second, the Commission directed PJM to propose Tariff revisions to grant legacy treatment to entities with existing contracts for the specific purpose of effectuating a BTMG arrangement for the current term remaining under the existing contract.[415] PJM therefore proposes to exempt Retail BTMG owned or contracted for as of December 18, 2025 to continue netting without the limit for the remaining term of the contract

[411] Co-Location Order, 195 FERC ¶ 61,209, at P 220.

[412] Attachment A-1, Proposed Tariff, Part III, section 34.2; Proposed Tariff, RAA, Schedule 8.

[413] December Order, 193 FERC ¶ 61,217, at P 223.

[414] Attachment A-1, Proposed Tariff, Part III, section 34.2(C).

[415] December Order, 193 FERC ¶ 61,217, at P 224.

effectuating the BTMG arrangement.[416] The Commission approved a three-year transition period and provisions granting legacy treatment in the Co-Location Order, as applied to PJM's previously proposed BTMG netting proposal.[417]

Third, the Commission directed PJM to include a process to exempt Cogeneration Facilities from its BTMG netting rules "if they demonstrate that they are integrated with load such that, when their generating facility trips offline, the load follows."[418] Consistent with this directive, PJM is proposing to exempt Cogeneration Facilities from its netting rules, subject to certain requirements to ensure the Cogeneration Facility is integrated with the retail load it serves such that if the Cogeneration Facility trips offline the retail load follows,[419] including potential audits for compliance with these requirements.[420]

To be eligible for the existing contractual arrangement or Cogeneration exemptions, PJM is proposing to require that the Large Load be on the Large Load Registry and the Retail BTMG be registered to allow PJM to account for the limit for settlement and billing purposes.[421] To that end, PJM is also proposing revisions to RAA, Schedule 8 to ensure the netting limits are reflected in the Obligation Peak Load calculation.[422] Taken together, these changes enhance PJM visibility into operating Retail BTMG in the region for planning purposes, while respecting existing commercial arrangements.

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[416] Attachment A-1, Proposed Tariff, Part III, section 34.2(D).

[417] Co-Location Order, 195 FERC ¶ 61,209, at PP 232-33.

[418] Co-Location Order, 195 FERC ¶ 61,209, at P 240.

[419] Attachment A-1, Proposed Tariff, Part III, sections 34.2(E)(a)-(e).

[420] Attachment A-1, Proposed Tariff, Part III, section 34.2(F).

[421] Attachment A-1, Proposed Tariff, Part III, sections 34.2(D)-(E).

[422] Attachment A-1, Proposed RAA, Schedule 8.

V. EFFECTIVE DATE

PJM requests that the Commission accept the proposed revisions in Parts I, III, VI, VII, IX, XI, Attachment F-3, Attachment F-3A, Attachment F-4, and parts of Part VIII to the Tariff to become effective March 16, 2027, which is not less than 60 days, nor more than 120 days, prior to the submission of this filing.[423] For those Part VIII revisions associated with the Fast Energization Process rather than compliance with the Co-Location Order (for which PJM requests a March 16, 2027 effective date), PJM requests an indefinite effective date of 12/31/9998, to allow PJM to make those provisions effective when the current Cycle, Cycle 01, reaches a sufficiently advanced stage so the next Cycle may begin. That point will be the next Business Day after the close of Decision Point II of Cycle 01, which PJM anticipates will occur in late November 2027.[424] PJM will submit a compliance filing to provide the Commission with the effective date of Part VIII once that date is known.

PJM does not believe any waivers of the Commission's Regulations are needed to permit its filing to become effective as proposed. In addition, to the extent the Commission determines that any other waivers are required, PJM respectfully requests the Commission grant such waivers as are necessary in order that the Tariff and RAA revisions may be made effective as proposed.

VI. CONSENT TO SEVERANCE OF ISSUES

PJM consents to the Commission's exercise of authority to sever the Proposed Tariff and RAA language, as needed and permitted under the FPA and *NRG Power*

[423] 18 C.F.R. § 35.3(a)(1).

[424] *Planning*, PJM Interconnection, L.L.C., Cycle Timeline (Oct. 23, 2026), https://www.pjm.com/planning [https://perma.cc/J283-5CFS].

Marketing.[425] Under FPA section 205, the Commission is in a "passive and reactive role" that requires it to accept or reject a utility's proposed rate scheme.[426] The Commission is prohibited from imposing modifications that "result in an 'entirely different rate design' than the utility's original proposal or the utility's prior rate scheme."[427] However, the Commission has some authority to propose modifications to a utility's proposal if the utility consents to the modifications.[428] The Commission has used this authority to sever discrete portions of a utility's proposed rate scheme, approving certain portions and rejecting others.[429] By contrast, in *NRG Power Marketing*, the United States Court of Appeals for the District of Columbia determined that the Commission improperly modified PJM's proposed rate scheme where the Commission's modifications "went in the opposite direction" and "followed a 'completely different strategy' than PJM's proposal."[430] In that circumstance, the Commission's modifications violated section 205, even with PJM's consent, because the Commission proposed an "entirely different rate design" that market participants did not have adequate notice of or opportunity to comment on.[431]

If it deems necessary, PJM consents to the Commission exercising authority to sever each element of the Tariff and RAA revisions proposed herein. PJM's Proposed Tariff and RAA revisions are not an integrated package that must be viewed as a whole

[425] *See NRG Power Mktg.*, *LLC*, 862 F.3d 108.

[426] *Hecate Energy LLC v. FERC*, 126 F.4th 660, 667 (D.C. Cir. 2025) (quoting *Advanced Energy Mgmt. All. v. FERC*, 860 F.3d 656, 662 (D.C. Cir. 2017)).

[427] *NRG Power Mktg.*, 862 F.3d at 115 (quoting *W. Res., Inc. v. FERC*, 9 F.3d 1568, 1578 (D.C. Cir. 1993)).

[428] *NRG Power Mktg.*, 862 F.3d at 115-16.

[429] *See, e.g.*, *PJM Interconnection, L.L.C.*, 197 FERC ¶ 61,019, at PP 13-15; *Pub. Serv. Co. of Colo.*, 94 FERC ¶ 61,135, at PP 28, 56 (2026).

[430] *NRG Power Mktg.*, 862 F.3d at 116 (quoting *W. Res., Inc.*, 9 F.3d at 1579).

[431] *NRG Power Mktg.*, 862 F.3d at 116 (quoting *W. Res., Inc.*, 9 F.3d at 1578).

and accepted together;[432] instead, each element of PJM's proposal individually advances PJM's overarching objective to comply with the June 2026 Orders and to safely and reliably integrate Large Loads and Co-Located Loads with the Transmission System. Therefore, the Commission will not go "in the opposite direction" or deploy "a completely different strategy" by severing certain elements of PJM's proposal.[433] Stakeholders will have the opportunity to comment in this proceeding on all individual elements of PJM's proposal that could be severed, eliminating any prior notice concerns. Further, through this pre-emptive grant of authority pursuant to which the Commission may sever each element of the proposal, stakeholders are on notice of potential changes to the proposal as filed and will have the opportunity to comment as they feel necessary and appropriate.

Although PJM consents to make each element of the proposed revisions to the Tariff and RAA severable, PJM has demonstrated that each element of its proposal is just and reasonable. Notwithstanding PJM's grant of authority to sever, PJM urges the Commission to accept all revisions as proposed so that PJM may commence compliance with the directives of the June 2026 Orders and begin preparations for the Fast Energization Process as quickly as possible.

VII. DOCUMENTS ENCLOSED

In addition to this transmittal letter, PJM encloses the following:

1. Attachment A-1: Marked March 16, 2027 Effective Date Proposed Tariff Revisions;

[432] *See PJM Interconnection, L.L.C.*, 197 FERC ¶ 61,019, at P 15 (refusing to sever certain elements of PJM's proposal, despite PJM providing consent to sever, because those elements "represent an integrated package that must be viewed as a whole").

[433] *NRG Power Mktg.*, 862 F.3d at 116.

2. Attachment B-1: Marked Indefinite Effective Date Proposed Tariff Revisions;

3. Attachment A-2: Clean March 16, 2027 Effective Date Proposed Tariff Revisions;

4. Attachment B-2: Clean Indefinite Effective Date Proposed Tariff Revisions;

5. Attachment C: Declaration of Donald Bielak, P.E.; and

6. Attachment D: Chart Mapping Order Directives to Tariff Changes.

VIII. CORRESPONDENCE AND COMMUNICATIONS

Correspondence and communications with respect to this filing should be sent to, and PJM requests the Secretary to include on the official service list, the following:[434]

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IX. SERVICE

PJM has served a copy of this filing on all PJM Members and on the affected state utility regulatory commissions in the PJM Region by posting this filing electronically. In

[434] To the extent necessary, PJM requests waiver of Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.203(b)(3), to permit all of the persons listed to be placed on the official service list for this proceeding.

accordance with the Commission's regulations,[435] PJM will post a copy of this filing to the Commission filings section on its internet site, https://pjm.com/library/filing-order, and will send an email on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region,[436] alerting them that this filing has been made by PJM and is available by following such link. If the document is not immediately available by using the referenced link, the document will be available through the referenced link within 24 hours of the filing.

[435] *See* 18 C.F.R. §§ 35.2(e) & 385.2010(f)(3).

[436] PJM already maintains, updates, and regularly uses email lists for all PJM Members and affected state commissions.

X. CONCLUSION

PJM respectfully requests that the Commission: (i) accept the proposed revisions to its Tariff and the RAA to effectuate PJM's new Fast Energization Process to study generation and load together in a one-year process and offer new transmission services to Co-Located Load, BTMG, and flexible Large Load; and (ii) deem the Large Load Show Cause Order's FPA section 206 aspect closed.

Respectfully submitted,

/s/ *Wendy B. Warren*

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