

October 2, 2026

Paula Conboy, Chair, Board of Managers
David Mills, President and CEO
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403

Via E-mail to: Jennifer Tribulski, Members Committee Secretary
David Mills, President and CEO

Dear Chair Conboy, Mr. Mills, and the PJM Board of Managers:

We write on behalf of a coalition of large energy customers committed to PJM's long-term success.

At the outset, we want to be clear about our shared objectives. We support efforts to accelerate interconnection timelines, lower costs for consumers, maintain reliability, improve planning outcomes, and ensure transparent and equitable cost allocation. We also support automation and innovation of planning processes that enable PJM to meet unprecedented load growth and the urgent need for new generation.

Specifically, we are concerned that PJM is pursuing an unprecedented approach to studying generation and load as its proposed response to FERC's Large Load Integration Show Cause Order. While the Order calls for improvements to large load integration, it does not require PJM to overhaul its entire generation interconnection queue.

PJM has suggested that bringing load and generation into a unified process will increase efficiency, speed, and transparency. However, we remain deeply concerned that the proposed approach could have the opposite effect. Under PJM's proposal, large loads must first progress through the Transmission Owner study process for the Transmission Owner to approve entry into PJM's proposed new queue. A customer that obtains that approval just after the annual cutoff could wait nearly a year for the next cycle, followed by another year in PJM's proposed study process. Even if PJM meets its proposed annual schedule, that could mean nearly two years between Transmission Owner approval and completion of the PJM process. If paired generation must enter the process with the load, the generator could be held out of the queue during that wait, delaying new supply that PJM urgently needs.

The proposal also raises significant questions regarding cost allocation, interim deliverability, and the interaction with regional transmission planning. The result is significant uncertainty regarding interconnection costs and energization timelines for new loads, even when those customers have committed to bringing new capacity.

Across the industry, there is growing interest to integrate system planning to yield optimized transmission solutions to diverse needs. Yet other regions pursuing these goals, including in MISO and SPP, generally use parallel but coordinated planning processes before bringing them together into an integrated system plan, rather than PJM's proposed approach to combine load and generation interconnection requests into a single cluster.

Most importantly, PJM has not demonstrated that this proposal will deliver the speed, certainty, or transparency envisioned by the Show Cause Order. Instead, there is substantial risk that it could increase queue complexity, delay project development, perpetuate cost uncertainty, and divert attention from meaningful consideration of a truly integrated system planning approach.

We therefore respectfully request that the Board direct PJM staff to either:

1. Explain why it is not directly complying with the Show Cause Order directives to establish an application and study process for the provision of transmission service for large loads that is 60–90 days or less; or
2. Pursue a more targeted response to the Show Cause Order while providing additional time to develop a comprehensive and durable framework for integrated planning.

Importantly, we are not suggesting that PJM abandon innovation or automation. We strongly support accelerating the deployment of next-generation planning processes. We also support PJM beginning to pilot and validate study automation, which can be done today within the Cycle process.

We appreciate the Board's consideration of these concerns. We support the objectives of the Show Cause Order and stand ready to work constructively with PJM on solutions that collectively advance speed, affordability, reliability, and planning transparency.

Sincerely,

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