November 6, 2026

PJM Board of Managers
PJM Interconnection, LLC
2750 Monroe Boulevard
Audubon, PA 19403

RE: Docket No. EL26-67, Large Load Show Cause Order and Docket No. EL25-49-002, Co-Located Load Rehearing and Compliance Order.

Dear Chair Conboy and Members of the PJM Board of Managers,

PJM stands at a pivotal moment: the need to meet growing demand requires bold leadership and new approaches. PJM's responses to FERC's Large Load Show Cause Order in Docket No. EL26-67 ("Large Load Order") and Co-Located Load Rehearing and Compliance Order in Docket No. EL25-49-002 ("June Co-Location Order") are critical to addressing the region's challenges. PJM staff have demonstrated leadership in putting forth an ambitious new approach to accelerate the study of generator interconnection and transmission service requests. If done right, a more integrated approach could optimize both processes, lower total infrastructure needs, and enable pathways to serve demand more quickly.

We write, however, with concern that PJM's current proposal does not yet adequately deliver on the promise to unleash the power of load flexibility.[1] Load flexibility, which includes on-site storage, on-site generation, proximate contracted generation or storage, demand response, behind-the-meter and front-of-the-meter distributed resources, can enable PJM to serve more customers using the infrastructure that we already have, protecting existing customers and enabling speed to power in the process.

We have seen the benefits that load flexibility can deliver under these conditions in the real world. In Oregon, for example, Portland General Electric enabled Aligned Data Centers to resolve a transmission constraint using load flexibility provided by 2-hour battery storage, which allowed the data center to connect four years faster than initially quoted.[2] Large load policy is now moving in the same direction. Dominion's draft large load product includes a locational layer that tests which resources could relieve a given load's constraints,[3] and Illinois's draft legislation would give large data centers firm service in proportion to the flexibility they bring, from their own facility, third-party demand response, or a utility program, and direct the utilities to align those requirements with the RTO's.[4]

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[1] Some of the signatories to this letter have written separately to express additional concerns with PJM's proposal related to its impact on the generator interconnection process and outcomes.

[2] DatacenterDynamics, "Aligned Partners with Calibrant to Deploy Battery System at Data Center in Pacific Northwest of US" (October 2025), https://www.datacenterdynamics.com/en/news/aligned-partners-with-calibrant-to-deploy-battery-system-at-data-center-in-pacific-northwest-of-us/. The 31 MW / 62 MWh system at the Hillsboro, Oregon campus lets the facility come online "much faster than would be possible through traditional utility upgrades."

[3] Dominion Energy Virginia, Large Load Working Group materials, September–October 2026 sessions, *available at* https://www.dominionenergy.com/about/delivering-energy/demand-flexibility. The design is in draft and the signatories are engaged in it.

[4] HB5513, 104th Illinois General Assembly, proposed 220 ILCS 5/16-105.8(b)(4) and 16-105.9(c)(3)–(5), pending in the veto session beginning November 17, 2026. Section 16-105.9(c)(5) would also require tariffs to identify "specific triggers for mandatory load flexibility" and to give applicants "the transparency and certainty needed for project financing and development."

PJM should seek to avoid a circumstance where a load completes a state or utility process on the basis of that flexibility, only to find the RTO tariff too narrow to recognize it. With an empowering regulatory framework, load flexibility can provide PJM a key tool to address many of the challenges created by large load growth.

Thus far, PJM has not provided the essential ingredients that are needed to achieve that goal. The linchpin of the efforts to enable new contract demand transmission services requires that the new service be appropriately reflected in all relevant study processes. Doing so would allow customers to rely on less network infrastructure where they avoid system impacts at critical times. It is our concern that PJM's current proposal may lack the requisite detail on five key elements needed to achieve this goal:

- Recognition of load flexibility commitments in transmission studies, such that these commitments enable reduced need for network upgrades (*see* Large Load Order at P 60);
- Clarity on how PJM's processes intersect with individual Transmission Owner processes and study criteria, with PJM and its Transmission Owners together clarifying that load flexibility commitments will be reflected across all study processes (*see* June Co-Location Order, EL25-49, at P 374);
- Certainty on the precise circumstances that could require non-firm transmission service curtailment to enable commercial decisionmaking (*see* Large Load Order at P 64);
- Separation of resource adequacy curtailments from transmission security curtailments within PJM's tariffs, so that loads can contract flexibility to address either or both; and
- A path to faster interconnection for loads whose flexibility commitments avoid or postpone the need for network upgrades (*see id.* P 63).

With the submission deadline fast approaching, we respectfully urge the Board to address these gaps to the greatest extent possible, and to consider directing staff to continue work on the components of the reforms that are essential to achieving real solutions to the challenges of large load growth in the region. We stand ready to collaborate with PJM to add further detail to its proposed tariff, whether through additional processes or as part of PJM's implementation. As PJM takes further steps in this proceeding, and more generally works to ensure that the region's supply meets demand, we would welcome the Board's encouragement of PJM to take the steps necessary to unlock the potential of load flexibility.

Sincerely,

The undersigned companies and organizations

Voltus	Calibrant	Verrus	Camus	NRG
Fluence	Hanwha Qcells	ERock	Generate Capital	Sparkfund
Utilize Coalition	Eolian	Madison Energy Infrastructure	Leap	Tesla
Everyday Electric	Advanced Energy United	Solar Energy Industries Association	Deploy Action	GridCARE