

Large Load Additions

Stakeholder Feedback

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The following slides provide PJM observations on the submitted comments to PJM's conceptual proposal discussed at the Pre-CIFP meeting on August 18, 2025. PJM's best efforts were made to capture all comment themes.

Individual Stakeholder Feedback topics are provided in the Appendix.

Additional comments not captured in the following slides might be captured in the PJM design matrix or outside the scope of this CIFP.

PJM remains open to alternative proposals that will solve the problem

Stakeholder Comments on PJM Proposal

Theme	Feedback	PJM Observation	PJM Action
CIFP	Significant stakeholder engagement and support for initiative.	PJM continues to support CIFP and collaboration with stakeholders on path forward.	N/A
Alternatives	Additional alternatives should be considered.	PJM considered multiple alternatives as provided in options matrix.	PJM is open to and encourages stakeholders to submit alternative proposals.
Jurisdiction	<p>PJM should (or cannot) deny interconnection of new load that causes resource inadequacy.</p> <p>PJM does not have authority over curtailment priority.</p> <p>The states should collaborate with PJM on a solution.</p>	<p>PJM is responsible for limiting load shed events and ensuring grid reliability, despite lacking the authority to directly control new load interconnections or mandate new generation additions.</p> <p>NCBL does not limit load interconnections but rather manages the load growth. The load forecast used for wholesale procurement is used to allocate NCBL for purposes of capacity shortages. PJM is not specifically directing which load needs to be shed in an emergency. Determining which load is shed is the responsibility of the TO/LSE.</p>	<p>No change to PJM proposal at this time.</p> <p>PJM continues to inform and collaborate with states. States may provide an alternative proposal.</p> <p>PJM remains open to alternative proposals that solve the problem.</p>

Theme	Feedback	PJM Observation	PJM Action
Load Forecast	<p>Concerns regarding load forecast accuracy.</p> <p>Large loads should be required to bid into RPM and be assigned a cost responsibility. This demonstrates commitment to integration and strengthens load forecast.</p> <p>PJM should have a large load interconnection process.</p>	<p>PJM does not have jurisdiction over load interconnections and cannot require load to bring its own new generation (BYOG) in order to connect.</p> <p>Multiple paths to enhance Load Forecast at Load Analysis Committee (LAS) including the following:</p> <p>2023: Manual 19 Attachment B updates to reflect more transparency in data needs and documentation from requesting EDCs/LSEs.</p> <p>2024: Added template to report large load adjustment request data.</p> <p>2025: Collaboration with stakeholders to create implementation document including financial backing for large load adjustment requests.</p>	<p>LAS enhancements to be complete by end of 2025</p> <p>PJM is considering alternatives, including requiring large loads to bid into auction and is open to the potential to include this in a final proposal following additional stakeholder discussion.</p>
Demand Response	<p>Demand Response should be allowed for limited hours.</p> <p>Demand Response rules are too extensive to include potential changes in CIFP.</p>	<p>Enhancements to Demand Response can be valuable but likely impractical during the expedited CIFP process.</p>	<p>Consideration can be made for changes in a follow-on process after CIFP concludes.</p>

Stakeholder Comments on PJM Proposal (cont.)

Theme	Feedback	PJM Observation	PJM Action
Interconnection	<p>PJM needs more interconnection pathways.</p> <p>BYOG should not harm existing queue.</p> <p>BYOG should be required.</p> <p>Concerns with BYOG receiving preferential treatment over generation in queue.</p>	<p>Multiple paths being considered outside of CIFP</p> <p>PJM Provisional Service review (Planning Committee)</p> <p>Proposal treats all generation equally. If interconnection changes are pursued equitable treatment should be considered.</p>	<p>In scope to the extent narrowly focused.</p> <p>PJM can consider moving Planning Committee Provisional Service review to this CIFP.</p> <p>PJM and stakeholders could explore narrow parallel process that expedites generation linked to large loads with project development confirmation.</p> <p>PJM proposal to enhance transparency and provide step-by-step guidelines to facilitate most efficient path for interconnection does not need stakeholder approval and will be pursued.</p>
Transmission	<p>Transmission enhancements needed before load can interconnect.</p> <p>Inconsistent RTEP and RPM treatment</p> <p>PJM should allow NCBL before transmission upgrades are complete.</p>	<p>PJM and TO must ensure the transmission system is reliable to protect equipment.</p> <p>The CIFP is a resource adequacy initiative.</p> <p>NCBL is for resource adequacy purposes only, which directly impacts RPM and real-time availability during emergency conditions.</p> <p>NCBL is not intended for avoidance of transmission enhancements and therefore the interconnecting load is included in RTEP and is planned for.</p>	<p>No change to PJM proposal.</p> <p>Transmission enhancements will continue to be planned to meet the load.</p>

Stakeholder Comments on PJM Proposal (cont.)

Theme	Feedback	PJM Observation	PJM Action
NCBL concept	<p>Feedback mixed, with many concerns expressed</p> <p>NCBL to large loads only is inequitable.</p>	<p>Status quo results in higher risk of manual load shed unless State/EDC/LSEs limit load interconnections.</p> <p>NCBL trigger and allocation based upon large loads that are causing the resource inadequacy only.</p>	NCBL concept remains part of PJM proposal.
NCBL definition	<p>NCBL should not include existing load and impact existing contracts.</p> <p>50 MW threshold too high.</p> <p>Mandatory NCBL should be capped at X years for each large load.</p> <p>There should be exceptions for PPA and contracts with existing supply resources.</p>	<p>PJM proposal assigns final NCBL as an aggregate value to EDC/LSE. EDC/LSE distributes among its customers.</p> <p>50 MW threshold chosen to align with Load Analysis Subcommittee recommendations and actual load forecast submission.</p> <p>Capping NCBL to XXX years could create disincentives for large loads for BYOG and/or commit as DR.</p>	PJM updated proposal treats as legacy existing large loads for trigger and determination of aggregate EDC/LSE assignments. It is expected that the EDC/LSE assigned the NCBL will honor existing arrangements.

Stakeholder Comments on PJM Proposal (cont.)

Theme	Feedback	PJM Observation	PJM Action
NCBL requirements	Mandatory requirement for NCBL may be infeasible or outside of PJM's jurisdiction.	<p>Mandatory requirement ensures enough participation to meet reliability requirement.</p> <p>PJM does not have authority over load interconnections or to require supply-side participation in RPM; However, PJM can issue load shed directives during emergencies to ensure grid reliability. NCBL results in load shed priority to subset of load causing resource adequacy shortfall.</p>	<p>Mandatory requirement remains a component of PJM proposal.</p> <p>PJM considered and is open to an alternative with voluntary only participation if the EDC/LSE/States prefer to inform PJM as to which loads should be NCBL and which not, thereby establishing the curtailment priority.</p>
RPM Price impacts	<p>Price Suppression because of requirement for NCBL to meet Reliability Requirement.</p> <p>RPM Price too high.</p> <p>PJM proposal needs to be integrated with the Quadrennial Review to assess long-term impact of pricing outcomes.</p>	<p>NCBL is an out of market solution to address transitional reliability challenges from large loads only. Price reflects NCBL impact through removal of demand required to meet Reliability Requirement.</p> <p>RPM price at reliability requirement still above Net CONE. NCBL triggered only from planned large loads. Large Load incentives to arrange for new supply may be greater with NCBL risk vs. RPM price.</p>	<p>No change to PJM proposal at this time.</p> <p>If voluntary participation is pursued instead of mandatory then price will be dictated by willingness to be flexible.</p> <p>PJM will conduct additional analysis regarding the impact of the proposal on the long-term Quadrennial Review results to determine if adjustments to the VRR curve or the PJM proposal are necessary.</p>

Stakeholder Comments on PJM Proposal (cont.)

Theme	Feedback	PJM Observation	PJM Action
RPM	RPM costs and/or auction should be bifurcated between load associated with organic load growth and large loads.	RPM reflects costs to provide reliability to all load. PJM currently does not assign the RPM costs to individual load. This is the responsibility of the EDC/LSE/States. PJM assigns total costs to each area based on cleared capacity on a peak load ratio share basis.	No change to PJM proposal at this time. PJM is open to alternative proposals that solve the problem.
Load type	Large loads for NCBL should include Industrial large loads too.	PJM is not excluding industrial large loads from participation in NCBL. PJM assigns NCBL in aggregate quantities to ELCs/LSEs. It is the responsibility of the EDC/LSE to assign the NCBL to individual loads, as the EDC/LSE does with capacity cost allocation.	PJM updated proposal allocates aggregate NCBL value to EDC/LSE based upon planned large loads only and EDC/LSE may assign to any large load including Industrial large loads.
Back-up resources	Not all data centers have back-up generators if required for NCBL.	PJM proposal is indifferent to type or availability of back-up resources. PJM proposal may motivate data centers to invest in back-up resources that are more reliable and cleaner.	No change to PJM proposal at this time. PJM is open to alternative proposals that solve the problem.

Stakeholder Comments on PJM Proposal (cont.)

Theme	Feedback	PJM Observation	PJM Action
BTMG	Non-Retail BTMG and BTMG should be out of scope.	NRTBTMG and BTMG are not part of PJM proposal and outside the scope of the CIFP.	Out of Scope of CIFP.
Stability of processes and expectations	<p>PJM should not interfere with the markets and interconnection queue.</p> <p>The states/TOs should handle the resource adequacy concerns.</p>	<p>The CIFP is a resource adequacy initiative.</p> <p>NCBL is an out of market solution to address transitional reliability challenges from large loads only.</p> <p>Status quo results in higher risk of manual load shed.</p>	<p>No change to PJM proposal at this time.</p> <p>PJM is open to alternative proposals that solve the problem, including alternatives that do not change existing PJM rules.</p>

Appendix: Individual Stakeholder Feedback

Note – attribution was withheld unless the commenter sought attribution

Stakeholder Individual Comments on PJM Proposal

Commenter	Topics Covered
Commenter 1 (Non-attribution)	<ul style="list-style-type: none"> • Scope of Issue Charge (Load Forecasting, Seasonal, Facilitating New Gen, BTMG and NRBTMG) • Proposal (Mandatory/Voluntary, Expansion to Existing, Incentives)
Commenter 2 (Non-attribution)	<ul style="list-style-type: none"> • Resource Adequacy • Interconnection
Commenter 3 (Non-attribution)	<ul style="list-style-type: none"> • NRBTMG scope • Role of EDC/LSEs to disconnect • Temporary solution
Commenter 4 (Non-attribution)	<ul style="list-style-type: none"> • Scope of Issue Charge (Load Growth, Align with Competitive Markets, Jurisdiction, Timeframe) • Proposal (Price Suppression, Feasibility, Interconnection, DR, Mandatory/Voluntary)
Commenter 5 (Non-attribution)	<ul style="list-style-type: none"> • Scope of Issue Charge (Load Adjustment Rules, Load Forecasting, Self-Supply, DR, Quad Review) • Proposal (Definition of NCBL, Operational Requirements, Calculation of Obligation Peak Loads, New Processes for BYOG, Process/Transition Rules, Providers, Settlements)
Commenter 6 (Non-attribution)	<ul style="list-style-type: none"> • Scope of Issue Charge (Transitional, Incentivization) • Proposal (Transitional, Feasibility, Impact on E & AS Markets, Allocation of Capacity Obligations, BYOG Accounting, Unintended Consequences, VRR Impact, Interconnection, DR)
Commenter 7 (Non-attribution)	<ul style="list-style-type: none"> • Proposal (Inflation of Baseline Load Forecast, Feasibility, BYOG Interconnection, VOLL/Willingness to Pay, Bill Headroom/Economic Incentives) • DR and Coincident Peak Allocation
Commenter 8 (Non-attribution)	<ul style="list-style-type: none"> • Proposal (NCBL and BYOG support, DR non-support) • Transmission Service Applicability

Stakeholder Individual Comments on PJM Proposal

Commenter	Topics Covered
Commenter 9 (Non-attribution)	<ul style="list-style-type: none"> • Emphasized Interconnection and SIS Improvements • Proposal (Mandatory/Voluntary, BYOG, DR)
Commenter 10 (Non-attribution)	<ul style="list-style-type: none"> • Ratepayer Protections • NCBL Eligibility and Threshold • Bilaterals with Existing Generation • LLA Queue
Commenter 11 (Non-attribution)	<ul style="list-style-type: none"> • Scope of Issue Charge (Updated 4R, Gen Queue Prioritization, NCBL, DR, Cost, No LLA Queue) • Proposal (Work with TOs on Service Agreements, Timing/Details, Voluntary/Mandatory, Masking Resource Adequacy, Interconnection Pathways, DR)
Commenter 12 (Non-attribution)	<ul style="list-style-type: none"> • Feasibility • BYOG • Proposal (Gen Queue, Load Forecast, ELCC, Storage, Transmission Planning)
Commenter 13 (Non-attribution)	<ul style="list-style-type: none"> • Scope of Issue Charge (Public Document on Data Center Flexibility, Cost Allocation, Critical Load Parameters, Tradeoffs and Options in Implementation, Feasibility, Application Footprint-Wide, Forecast Discrepancies, Process for Allocation Mandatory Curtailments, BTMG and Non-Retail BTMG) • Proposal (DR Resemblance, Dynamic Requirement, Component of Emergency Procedures, Escalating Enforcement, Reward/Penalty Driven Compliance, Last Resort, Isolated from Market-Related Activity, Customer Involvement, Built on Established Processes)
Governors: Pennsylvania, Illinois, Maryland, New Jersey	<ul style="list-style-type: none"> • NCBL as Potential Backstop Mechanism • Improved Load Forecasting • Gen Queue Reforms • Regional Transmission

Commenter	Topics Covered
Digital Power Network	<ul style="list-style-type: none"> • Resource Adequacy and NCBL Concerns (Voluntary, Transitional and Paired with Compensation or Market-Based Alternatives) • DR and BTM Resources (Modernize Frameworks) • Interconnection Pathways and Gen Queue Enhancements (Fast Lane) • Coordination and Timing
Exelon	<ul style="list-style-type: none"> • Legal Flaws (Retail Services, NERC Standards) • Broadening Scope (Voluntary, Load Shed Education)
Shell	<ul style="list-style-type: none"> • Mandatory/Voluntary • Detailed Load Data Qualifications • Expedited Gen Queue Pathway Criterion • Price Formation
PA Consumer Advocate	<ul style="list-style-type: none"> • Key Points / Summary of Proposal • Questions Presented • Legal Authority • Concerns/Comments (BYOG, Penalties and Credit Requirements, Curtailment Restrictions, Conditions, Locational Requirement, BYOG BTM vs. FOM, Legal Authority, Additional Clarity on Gen Queue and DR Proposals)
SEIA	<ul style="list-style-type: none"> • Undermining Existing Gen Queue Reform and Projects • Use of Existing Solutions on Gen Queue
Advanced Energy United	<ul style="list-style-type: none"> • BYOG and Gen Queue Pathways vs. NCBL

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Commenter	Topics Covered
EKPC	<ul style="list-style-type: none"> • NCBL (Jurisdiction, RAA, State Collaboration, Operational Difficulties)
	<ul style="list-style-type: none"> • Priority Interconnection Pathways
	<ul style="list-style-type: none"> • Possible Re-Thinking of RPM/LSE Obligations
Glatz/Silverman	<ul style="list-style-type: none"> • Apply New Capacity Market Rules to LLAs After Date-Certain
	<ul style="list-style-type: none"> • Requirement to Enter As Non-Firm Capacity-Backed
	<ul style="list-style-type: none"> • Requiring All New LLAs to Take Non-Firm Capacity Service
	<ul style="list-style-type: none"> • Rules for Procuring Firm Capacity Service and BYOG
	<ul style="list-style-type: none"> • Establishing Non-Firm Capacity Service and Supply Purchase at Discounted Rate
	<ul style="list-style-type: none"> • Appropriate VRR Curve Point
	<ul style="list-style-type: none"> • Applicability Based on LDA Size
	<ul style="list-style-type: none"> • CIFP Phase II
	<ul style="list-style-type: none"> • Public Database for LLA
	<ul style="list-style-type: none"> • Accelerated Interconnection
Enchanted Rock	<ul style="list-style-type: none"> • LLAs/Transmission Service Prior to Inclusion in BRA
	<ul style="list-style-type: none"> • Large Load Flexibility
Constellation	<ul style="list-style-type: none"> • NCBL Legal and Economic Efficiency Challenges
	<ul style="list-style-type: none"> • Market-Based Improvements to Serve New Load While Ensuring Resource Adequacy (Load Forecast, Market Signals Incentivizing Investment)

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Commenter	Topics Covered
Delaware Public Service Commission	<ul style="list-style-type: none"> • Service Adjustments Based on Year to Year Increases • 50 MW Threshold
Advanced Power	<ul style="list-style-type: none"> • Alternative Proposal for Integration with Capacity Market • NCBL And Market Based Solutions • NCBL Participation in BRA • NCBL Eligibility • Gen Queue Fast Track for BYOG
Vistra	<ul style="list-style-type: none"> • Load Forecasting • Proposal (Existing Opportunities to Procure Capacity, Legal Discrimination, Interaction/Clarity with RPM)
New Jersey Division of Rate Counsel	<ul style="list-style-type: none"> • Issue Charge Scope (Inclusion of Consumer Rates)
Electricity Customer Alliance	<ul style="list-style-type: none"> • Phased Approach • First Phase: Stabilizing Price for 28/29 BRA, Load Forecast, BYOG, DR) • Second Phase: Education and Implementation of LLA Process
LS Power	<ul style="list-style-type: none"> • Problem to Solve • Guiding Principles • Markets Compatible Package • Jurisdiction and Roles

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Commenter	Topics Covered
Microsoft	<ul style="list-style-type: none"> • Jurisdictional Overreach and Timing • Market Integrity Risks • Use of CFP Process
Calpine	<ul style="list-style-type: none"> • NCBL Legal Discrimination • NCBL Price Suppression (Capacity and Energy)
Data Center Coalition	<ul style="list-style-type: none"> • Load Forecasting • Proposal (Legal Discrimination and Jurisdictional Overreach, Illogical and Inconsistent Market Treatment, Contradictory Load Classification, Unsupported Assumptions, Undefined Requirements) • Lack of Pathways for Alternatives
Monitoring Analytics	<ul style="list-style-type: none"> • BYOG • Other Options (Status Quo, Cost of Service Regulation, Financial Commitments, Co-Located Load, Bilateral Contracts for Existing Resources, Load That Is Not Load in Capacity Market, PJM's Proposed Two Step Approach to Capacity Market Clearing)
Eolian L.P.	<ul style="list-style-type: none"> • NCBL Applicability to Voluntary Contracting Between New Supply and Demand Resource • Co-Location • Direct Capacity Supply • NCBL Proposal (Transitional Nature, BYOG/NCBL As Separate Concepts, Inducing Voluntary Participation) • Gen Queue Enhancements
Alpha Generation	<ul style="list-style-type: none"> • Supportive of Vistra's Comments • Capacity Market (Cap on Market, Interplay with QR, RTEP Process Interaction, Existing Project Development, NCBL Functionality)

Commenter	Topics Covered
Industrial Customers Coalition	<ul style="list-style-type: none"> Objectives and Scope of CIFP (More Inclusive and Expansive Approach to NCBL, Supply-Side DR and BTMG) NCBL Proposal (Extend to Existing Loads and Smaller Loads, Appropriate Enforcement Provisions, Proximity Requirements, Transmission Add-Backs, Permanent Solution)
Google	<ul style="list-style-type: none"> Load Forecasting Large Load Interconnection Process BYOG (Participation Requirements, Interconnection Benefits, Deliverability and Alignment with Transmission Interconnection, Demonstration, ELCC Valuation) DR Mandatory/Voluntary Alternative Straw Proposal for NCBL Participation Commitments in Load Forecasting
Maryland Office of People's Counsel	<ul style="list-style-type: none"> BYOG LLA Queue Load Forecasting Energy Impacts of LLAs
Illinois Attorney General's Office	<ul style="list-style-type: none"> Scope of Issue Charge (Cost Socialization, Fair and Effective Connection vs. Rapid Connection, BYOG) Exploration of Larger Improvements to BRA Framework Siloed Discussions and Quadrennial Review Connectivity
Talen Energy	<ul style="list-style-type: none"> Jurisdictional Challenge

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Commenter	Topics Covered
Amazon Data Services, Inc.	• Load Forecasting
	• Voluntary Procedures to Support Development of Generation
	• Fair Customer Treatment
	• DR
MN8	• Transmission Solutions
	• Load Forecasting
	• Voluntary Solutions (Voluntary NCBL, BYOG)
	• Later In-Service Dates for Full Capacity Backed/Network Load Status
	• BYOG Design
	• Forward Planning
Earth Justice and NRDC	• Capacity Pricing and BYOG
	• Provisional Interconnections and Energy-Only Resources Awaiting CIRs
	• Jurisdiction
	• NCBL Proposal (Intrinsic Load Growth vs. Reliability Requirement, Existing DR, Relationship to Load Shed, Backup Generation and State/Federal Law)
	• Issue Charge Scope (Include Affordability)
Jim Wilson	• Varied Comments on Slides from PJM Presentation from August 18th
	• Capacity Market Ability to Solve for Large Load Additions

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Commenter	Topics Covered
Delaware Division of Public Advocate	<ul style="list-style-type: none">• Consumer Costs
Renewable Solutions LLC	<ul style="list-style-type: none">• Design Specifics for Priority Interconnection Pathway
Pennsylvania PUC	<ul style="list-style-type: none">• Load Forecasting
	<ul style="list-style-type: none">• NCBL Proposal (Explore PRD and DR As Well)
	<ul style="list-style-type: none">• Gen Queue Focus on Clearing Existing