IMM CIFP Large Load Additions (LLA) Proposal

CIFP-LLA 10.14.2025 **IMM**



IMM LLA Proposal

- Do not interconnect large new data center load that cannot be served reliably.
- Establish an interconnection queue for large new data center load.
 - Results must be reliable for the transmission system.
 - Results must be reliable for capacity and energy supply.
- For large new data center load that wants an expedited process, the solution is to bring your own new generation that is matched to the location and the duration of the load.
 - An expedited process for generation and load will be provided. Monitoring Analytics

Bring Your Own New Generation

- Required MW of generation are in UCAP MW.
 - ELCC adjusted.
 - Plus reserve margin.
- Generation must be deliverable to PJM system (CIRs).
- Generation must be deliverable to large new data center load.
- Generation time duration must match the duration of the load.
 - Generation cannot be available for only a limited number of hours hourly/daily/weekly/monthly.
- DR is not generation.

Bring Your Own New Generation

- The bring your own new generation must be generation that has not previously cleared in an RPM auction.
- The bring your own new generation must be subject to the MSOC for existing capacity resources per current rules.

Load and Generation in Markets

- Actual interconnection is permitted when both load and generation are ready.
- The bring your own new generation is offered into capacity market as part of supply.
- The large new load is part of PJM load in the capacity market.
- The capacity market clears with both load and generation included.

Load Forecast

- Improvements to load forecast should be implemented when possible.
- Regardless of the accuracy of load forecasts, the issues about reliably serving new large data center load remain.
- The best way to address the uncertainty in the load forecast that results from new large data center loads is to require the loads to bring their own new generation.

Monitoring Analytics, LLC
2621 Van Buren Avenue
Suite 160
Eagleville, PA
19403
(610) 271-8050

MA@monitoringanalytics.com www.MonitoringAnalytics.com