



Advance Notice of Proposed Rulemaking: Ensuring the Timely and Orderly Interconnection of Large Loads (RM26-4)

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“In light of the unprecedented current and expected growth of large loads seeking to interconnect to the transmission system, and to provide open access and nondiscriminatory access to the transmission system, it has become necessary to standardize interconnection procedures and agreements for such loads, including those seeking to share a point of interconnection with new or existing generation facilities (hybrid facilities).”

ANOPR at P 12

ANOPR asserts there is FERC jurisdiction over large load interconnections because:

1. Large load interconnections are critical to open access transmission service and require minimum terms and conditions to ensure non-discriminatory transmission service.
2. The interconnection of large loads are a practice that directly affects FERC-jurisdictional wholesale electricity rates.
3. FERC jurisdiction over large load interconnections does not interfere with States' authority over retail electricity sales, and authority over expansion or siting of generation facilities remains entirely within State control.
4. FERC has exclusive jurisdiction over transmission of electric energy in interstate commerce and all facilities for transmission/sale of electric energy at wholesale in interstate commerce.

ANOPR at PP 13-16

1. FERC's jurisdiction should be limited to interconnections directly to transmission facilities, consistent with FERC's seven-factor test.
2. The reforms should only apply to new, large loads greater than 20 MW, and for hybrid facilities with greater than 20 MW load.
3. Load and hybrid facilities should be studied together with generating facilities.
4. Load and hybrid facilities should be subject to standardized study deposits, readiness requirements, and withdrawal penalties.

5. Hybrid facilities should be studied based on the amount of injection and/or withdrawal rights requested.
6. Any hybrid interconnection should be required to install system protection facilities necessary to prevent unauthorized injections or withdrawals that exceed the respective rights.
7. Expedited interconnection studies of large loads that agree to be curtailable and hybrid facilities that agree to be curtailable and dispatchable.

8. Load and hybrid facilities should be responsible for all network upgrades that they are assigned through the interconnection studies.
9. To the extent the interconnection customer is not the transmission owner, the interconnection customer shall be given the same or equivalent option to build as provided to generator interconnection customers.
10. An existing generating facility that seeks to enter a partial suspension to serve a new load at the same location must go through a system support resource/reliability must run type study.

11. Utilities serving large loads, including those at hybrid facilities, should be responsible for transmission service based on their withdrawal rights.
12. Utilities serving large loads, including those at hybrid facilities, should be responsible for ancillary services based on peak demand, without consideration of any co-located generation.
13. Need for a transition plan to implement proposed reforms.
14. Utilities serving large loads must meet all applicable NERC reliability standards and OATT provisions.

“This proposal is not intended in any way to discourage public utilities from making filings to address these and similar issues under FPA section 205.”

ANOPR at 32

- FERC requesting initial comments by November 14, 2025; reply comments due by November 28, 2025
 - Organization of MISO States has a pending motion for a 2-week extension
- Department of Energy requesting FERC's "final action" by "no later than April 30, 2026"

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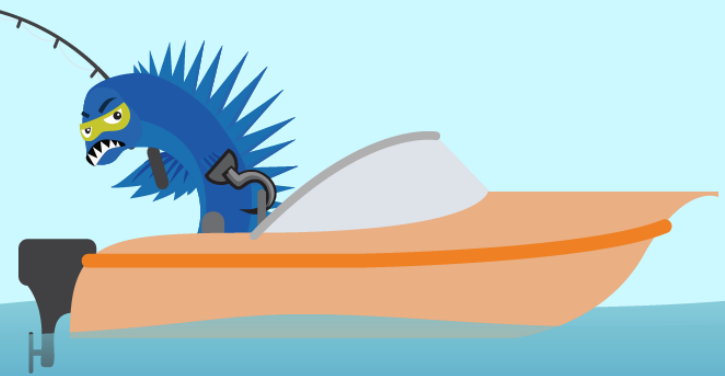
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