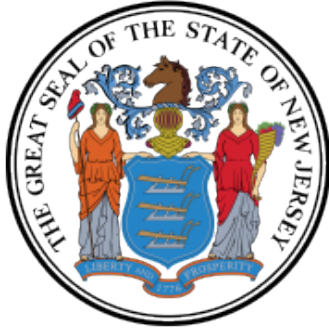




Joint Proposal For CIFP LLA

Load Forecasting, Enhanced Demand Flexibility, vBYOG

November 6, 2025

Three Components

1. Load forecasting enhancements
2. Enhanced Demand Flexibility
3. Voluntary Limited BYOG Pathway

1. Load Forecasting Enhancements

Originally from the Amazon, Calpine, Constellation, Google, Microsoft, Talen Joint Stakeholder Package:

- Only include large new load that has a meaningful/verifiable commitment. Examples of which include:
 - Energy Service Agreement
 - Credit/collateral support
 - Financially significant infrastructure investment
 - Long-term supply commitment with new or existing resources
- Improve large load modeling assumptions including, but not limited to, ramp rate assumptions, utilization rates, and reduction of double counting
- Implement a Large Load Forecast “Reality Check”: Consider other relevant factors that may predict whether all proposed large load is likely to come to fruition. Examples include, but are not limited to:
 - Historic large load success rate and development progress reviews along with comparison to supplemental projects
 - Supply chain and other limitations such as chip (un)availability
 - Other business expert reviews (McKinsey, S&P, BNEF, LEI Study, LBNL, etc.)
 - Conversations/information exchange among large load customers, PJM, and TOs

2. Enhanced Demand Flexibility

Originally from the Amazon, Calpine, Constellation, Google, Microsoft, Talen Joint Stakeholder Package:

- Voluntary large load limited demand response
 - Allow large load to clear as limited [24 to ~~100~~ 240 hours/year] demand response. Discounted Effective Load Carrying Capability (ELCC) to reflect the reduced availability.
- Back-up generator operations
 - Provide relief during system emergencies using back-up generators. Agree to operate within criteria acceptable to the owners (i.e., consistent with their commitment to the environment, noise reduction, etc.)
- Establish new PJM emergency procedure
 - Step, 9A, for deployment immediately prior to manual load dump.

3. Voluntary Limited Large Customer BYOG Pathway

Create a limited, voluntary pathway for large load customers to bring their own generation:

- Large loads that elect this pathway receive expedited load interconnection timelines in exchange for matching their load with generation (this is state led, not in PJM tariff).
- Resources brought forward by large load customers would receive expedited interconnection treatment by PJM, as an option along with state sponsored projects, an expansion of PJM's original proposed Expedited Interconnection Track (PJM tariff)
- This pathway is voluntary; existing pathways remain.

Four Tenets of Voluntary Limited Large Customer BYOG

1. Customer-Enabled Capacity Commitment
2. Acceleration of Load & Generation Interconnection
3. State Siting & Permitting Collaboration
4. Volatility Control During Market Transition

Tenet 1 — Customer-Enabled Capacity Commitment

Large customers qualify for expedited interconnection if they make a **financial commitment** – via PPA or similar agreement to:

- Enable a *new* generation resource;
- Uprate or expand an existing resource to maximize utilization at its point of interconnection
- Support a resource that didn't clear the previous capacity auction
- Retain certain generating resources with (1) an independent audit finding a compelling economic basis for retirement and (2) approval by the state.
- Resources that undergo fuel-switching for economic reasons to another more efficient fuel type

*Generation must be **one-for-one** accredited capacity tied to the large load customer's ramp and utilization schedule* – any capacity auction that includes participating load must incorporate the qualifying UCAP-equivalent generation accompanying that load, including the reserve margin at the initial delivery year. If at the start of the delivery year, the generator is unable to meet its capacity commitment, the accompanying load commits that it will only interconnect if it is willing to enroll equivalent UCAP in Step 9a of emergency procedures.

Tenet 2 — Acceleration of Interconnection

Large load customers can work with developers and the utility to ensure accelerated interconnection of both load and generation facilities that are located within the same Locational Deliverability Area (“LDA”).

- Supported by state directive for expedited review
- PJM Interconnection studies completed in 90 days for physically proximate generation facilities, and within 180 days for projects in the wider LDA (timeline under discussion).
- PJM to share study results with customers for transparency, mirroring generator study access.

In addition, PJM will file modifications to the existing ERIS pathway to increase usability, and to unlock expanded opportunities for energy only resources, before 2027.

Tenet 3 — State Siting & Permitting Collaboration

Outside of the PJM process, engage a state consortium among customers and states to provide a state sponsored project siting and permitting mechanism to accelerate large load project development.

Tenet 4 - Volatility Control During Market Transition

- To reduce volatility during implementation of this proposal, extend the current price collar by one year.

Discussion