

Critical Issue Fast Path – Large Load Additions
Stakeholder Survey Responses

Company Name	2a. Please enter any questions for PJM regarding their proposed package.
N/A	How much capacity do you expect EIT to deliver?
Duke Energy Business Services LLC & Affiliates	What does the step to add state commissions look like? Could you see different states having different processes? How would you handle a situation where a company is certain with the LLA but the state is not? What would the 3rd party review process look like? How would including PJM on the NDAs work.
Earthjustice	Please explain how PJM's proposed interconnection fast track will impact projects in the interconnection queue. Please specifically address: (1) whether the proposed fast track will cause delays for cluster studies; (2) how PJM intends to deal with penalties for missed cluster study deadlines caused by the devotion of resources to the interconnection fast track; and (3) whether the interconnection fast track may increase network upgrade costs for projects in study clusters by utilizing headroom for fast-tracked projects that would otherwise be available for the cluster. Please provide as concrete and detailed an estimate of these impacts as possible.
N/A	In the EIT, will the \$10k/MW Readiness Deposit be refundable and, if so, up until what point in the study process? This is an important detail needed for project financing parties to understand their risk exposure.
AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity

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	Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads? 4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the establishment of an interconnection queue for large loads), how would those enhancements (and that establishment) impact or implicate the Load Serving Entities, since they have the obligation to serve the end use customers who have reached out to them for those large load interconnections?
N/A	Matrix, line 14 - please explain or share link to education on 7-year lock-in and new entry pricing adjustment. Matrix, line 52 - there is a question at the bottom of the field, can PJM please resolve or provide info? Line 53 - due to their size, how would DR aggregation work for data centers under Order 2222? Wouldn't each be its own aggregated resource? Line 58 - what type of evidence is sufficient to demonstrate state commitment? Could a state expedite permitting/siting under similar timelines to be available during the implementation process?
Company Name	2b. Please enter any comments for PJM regarding their proposed package.
Duke Energy Business Services LLC & Affiliates	Not sure of the willingness of large loads to identify a duplicate request.

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Delegate Linda Foley, The Maryland House of Delegates	PJM's current proposal for how to bring new large loads onto the grid is unacceptable for my constituents; it could force them to pay an extra \$70 a month on their electricity bills by 2028 through 2033, with virtually all of this going to existing power plant owners. Additionally, it does nothing to instill confidence in the long-term reliability of PJM by providing no clear plan to deal with reliability risks driven by data centers, like blackouts for homes and businesses and expensive scarcity pricing periods. Instead, I urge PJM to require new large loads, such as data centers, to bring their own capacity. This capacity could include new generation (including distributed resources), battery storage, demand response programs, and other creative solutions. It is essential that this approach is a requirement for all new large loads, rather than an option, to avoid unacceptable reliability risks like blackouts. This flexible approach will protect my constituents and small businesses in my community from years of continued high electricity bills and will result in the certainty, speed, and reliability that is so important to data center developers. Thank you for your consideration.
Earthjustice	The proposed interconnection fast track is problematic. PJM's quick about-face from describing the Reliability Resource Initiative as a "one-time" intervention to now proposing a regular, recurring fast-track is troubling. It is also highly problematic for PJM to propose such a significant departure from the cluster study process required under Order No. 2023 before PJM even begins implementing its compliance with that Order.
N/A	Our comments below are with respect to the EIT (or any other queue fast track that limits volume of projects). 1) In addition to other eligibility requirements, PJM should require project developers to provide evidence of advanced procurement of long-lead time equipment (e.g., purchase orders for HV transformers, breakers, etc.). PJM should also require developers, where applicable, to provide evidence of having secured a long-term fuel supply contract (e.g., precedent agreement). Both of these requirements would better screen for project maturity and increase the likelihood that the fast-tracked project can COD on its stated timeline. 2) Where discretionary permits are required at the county level, they represent significant binary risk to project development that is not addressed by virtue of receiving a support letter from the state (because the state cannot, in most cases, override county permitting). PJM should require a support letter from the county similar to the support letter required from the state. PJM should require such a letter in all cases to minimize administrative

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	burden (i.e., so that PJM can avoid needing to determine on a project-by-project basis whether a discretionary permit from the county is required). 3) With respect to the \$10k/MW Readiness Deposit, PJM should at least double that amount to ensure it is a useful screening tool for project maturity and commercial readiness. For reference, in the MISO ERAS process, the security posting requirement is \$24k/MW.
N/A	Consistent with the feedback PJM has received from other members, our company firmly believes that PJM must take immediate steps in the current CIFP to support the new entry of large, dispatchable resources. This could include either a multi-year capacity price lock, or long-term forward-looking procurements. We cannot rely on merchant entry, which is unlikely to occur due to years of low prices and market intervention, to provide the supply needed for the reliability. Waiting for a follow up initiative to address this issue puts the limited number of projects in development today at risk. Many of these resources are currently in Transition Cycle #2 and face near-term decisions on whether to continue with the process and invest millions of dollars in these resources before even receiving an interconnection agreement. Without a clear and immediate indication from PJM that it plans to address the lack of long-term revenue certainty that will be required to get these resources built, it is likely that many of these projects will withdraw from the queue rather than put more money at-risk. PJM's interconnection EIT proposal, meanwhile, restricts eligibility to only projects that can come online within 26 months after signing an interconnection agreement which forecloses on the possibility of adding any new combined-cycle generation. CCGTs, which take 4+ years to construct, are the very type of projects that should be accelerated in the interconnection process so they can get going. Forcing them to wait longer to even start construction does not make any sense. PJM should remove the 3-year COD eligibility requirement for EIT.
N/A	General concern around parallel EIT process and its impact on the regular queue cycle study process/inputs. Any changes to the generation queue process should ensure that existing cluster study processes are not delayed or disrupted.
Duquesne Light Company	We request that PJM reconsider its proposed approach on changes to the load forecast, which would require EDC/LSE/TOs to modify customer NDAs to provide “all” information to PJM for inclusion in the load forecast. A more reasonable approach would be to establish clear, bright-line criteria or specify the exact data elements needed to be included the forecast. By clearly defining the required information, PJM can enable EDC/LSE/TOs to

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	work with their customers to gather the necessary data. It is not appropriate for PJM to dictate what is or is not included in an NDA between an EDC/LSE/TO and their customer.
Delaware Public Service Commission (staff)	Overall, PJM's package continues to fall short of assurances of maintaining reliability. If LSEs of new large loads are not required to bring on new supply or new demand side resources, reliability will suffer, capacity and energy prices will rise dramatically.
N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...
Company Name	3a. Please enter any questions for the Data Center Coalition (DCC) and Governors' Joint Proposal regarding their proposed package.
N/A	How does this proposal ensure that no costs are paid for by other existing ratepayers?
Earthjustice	Please explain what fraction of large loads you expect to utilize the "carrots"-based approach in your proposal, and what fraction of large loads you expect not to be enticed to do so. What would the impact on consumer prices be from: (1) full participation by large loads in your proposal; versus (2) moderate participation (i.e. only 50% utilization) by large loads.
AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell

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	electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads? 4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the establishment of an interconnection queue for large loads), how would those enhancements (and that establishment) impact or implicate the Load Serving Entities, since they have the obligation to serve the end use customers who have reached out to them for those large load interconnections?
N/A	Understanding various proposals of Governor Shapiro to expedite state siting of projects, has there been any consideration of whether there are options to expedite local siting in PA and other states? How will the consortium work? Will each state be responsible for sponsoring projects in that state or will the collective consortium have to agree on which projects get sponsored? Under Tenet 4, is the primary change the opportunity for a large load customer to be reimbursed for up front investments if other customers utilize a network upgrade?
Illinois Citizens Utility Board	1) This package builds on the Joint Stakeholders package. Is the intention that both packages will pass individually, or that the DCC/Governors package subsumes the Joint Stakeholders package? 2) Should an LLA decide not to pursue BYOC, you answered that the alternative is status quo. The status quo is an LLA connecting to the system without an assurance there is enough capacity to serve the load. This can lead to reliability issues and high capacity prices. Is that an outcome this proposal contemplates?
Delaware Public Service Commission (staff)	As to the prepayment for network upgrades to access accelerated interconnection, it is unclear whether project costs related to interconnection of matched supply and new large load that are included in the RTEP and/or long

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	term transmission plan would be included in this cost responsibility. Alternatively, do these costs just encompass more local supplemental project costs for load interconnection and supply interconnection costs?
Company Name	3b. Please enter any comments for the Data Center Coalition (DCC) and Governors' Joint Proposal regarding their proposed package.
Earthjustice	While some of the carrot-based approach in this proposal may be enticing to some large loads, it is troubling that there is no mechanism included to address unjust and unreasonable rates that may occur if large loads do not voluntarily participate in sufficient numbers.
N/A	As the joint sponsors continue to work to finalize a package proposal in the matrix, please consider the importance of clearly delineating the different processes and existing jurisdictional boundaries related to the interconnection of load (state retail tariffs) versus the interconnection of generation (FERC/wholesale processes) and ensuring existing authorities are preserved, absent a change in law.
Illinois Citizens Utility Board	If one of the goals of this package is to prevent ratepayers from shouldering LLA-related costs, we are concerned that this package allows LLAs to contract with existing generating resources. Specifically: -allowing large loads to contract with existing generating resources if an independent audit finds a compelling economic basis for retirement. We are concerned that this is subject to gaming the system and taking away existing generation from the rest of load. This will likely result in higher capacity prices. -allowing large loads to contract with resources that undergo fuel-switching again takes away existing generation from the rest of load. This will likely result in higher capacity prices.
Delaware Public Service Commission (staff)	This package is limited to voluntary program incentives, mainly to accelerate interconnection related to BYOG. While that principle is an important component of maintaining resource adequacy, the details and guardrails are lacking, and it is unclear if PJM can grant CIRs in 90 days. Impacts on the existing queue processing is missing, and mandatory requirements [including multiple options] to maintain resource adequacy associated with new large loads is a necessary component to any comprehensive and effective CIFP solution. It appears that this Joint Proposal seeks to mitigate this lack of comprehensiveness by offering a 1-year extension of the existing capacity price collar. This is not a sustainable solution.

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N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...
Company Name	4a. Please enter any questions for Sue Glatz and Abe Silverman regarding their proposed package.
AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads? 4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the establishment of an interconnection queue for large loads), how would those enhancements (and that establishment) impact or implicate the Load Serving Entities, since they have the obligation to serve the end use customers who have reached out to them for those large load interconnections?
Company Name	4b. Please enter any comments for Sue Glatz and Abe Silverman regarding their proposed package.

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Duke Energy Business Services LLC & Affiliates	Unsure how to govern the LLA from duplicating a request. Unsure an Large Load would agree to these requests.
Delaware Public Service Commission (staff)	As there was no substantive change to this proposal, no additional comments are offered herein.
N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...
Company Name	5a. Please enter any questions for Arnie Quinn (Vistra) regarding their proposed package.
AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads?

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	4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the establishment of an interconnection queue for large loads), how would those enhancements (and that establishment) impact or implicate the Load Serving Entities, since they have the obligation to serve the end use customers who have reached out to them for those large load interconnections?
Company Name	5b. Please enter any comments for Arnie Quinn (Vistra) regarding their proposed package.
Delaware Public Service Commission (staff)	No further comments, as this proposal is essentially unchanged from the previous proposal.
N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...
Company Name	6a. Please enter any questions for Dan Pierpont and Tom Hoatson (LS Power) regarding their proposed package.
Duke Energy Business Services LLC & Affiliates	Would forcing TEAC and the large load forecasts to reconcile cause any issues?

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AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads? 4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the establishment of an interconnection queue for large loads), how would those enhancements (and that establishment) impact or implicate the Load Serving Entities, since they have the obligation to serve the end use customers who have reached out to them for those large load interconnections?
Company Name	6b. Please enter any comments for Dan Pierpont and Tom Hoatson (LS Power) regarding their proposed package.
Delaware Public Service Commission (staff)	The goals of a bifurcated capacity market are well intended – helping to mitigate the very substantive high price impacts on existing customer who are already struggling to pay their utility bills. It is likely a requirement for new large loads to simply bilaterally contract for new supply side and demand side resources through their LSE would be a cleaner and more quickly implementable solution. However, absent this, an economic incentive, such as the proposed “entry fee” imposed on the LSEs of new large loads that fail to take responsibility for their impacts on resource adequacy, and impose additional energy market costs on existing customers, may be a viable temporary alternative, pending full new supply development by the LSE’s associated with these new large loads. Stakeholders should further discuss how much of the entry fee, over time, should go to LSEs and how much to capacity resources under such a proposal.

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N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...
Company Name	7a. Please enter any questions for Heather Svenson (PSEG) regarding their proposed package.
AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads? 4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the establishment of an interconnection queue for large loads), how would those enhancements (and that establishment) impact or implicate the Load Serving Entities, since they have the obligation to serve the end use customers who have reached out to them for those large load interconnections?
Delaware Public Service Commission (staff)	It is unclear what site control features this proposal advocates for relative to the site control requirements of our existing queue process. Please clarify.

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Duke Energy Business Services LLC & Affiliates	1. What does the state process look like? What if there are different opinions on the likelihood of an LLA? 2. What specifically would differ from the current process? 4. How will a 3rd party have better information than the utility providing the information? What happens if the 3rd party and PJM forecasts don't align?
Company Name	7b. Please enter any comments for Heather Svenson (PSEG) regarding their proposed package.
Delaware Public Service Commission (staff)	Delaware PSC staff are generally supportive of improvements to the forecast process for large loads, and encourages many of these reforms to be considered by PJM. We are also supportive of any reforms that help bring on new generation faster for shovel ready projects that have sufficient guardrails to minimize impacts to the existing queue. This interconnection proposal should be examined within that context. Lastly, we are supportive of the existing Sub-Annual Capacity Market Senior Task Force process, and look forward to further study and potential implementation of reforms that can increase the efficiency of the capacity market by matching resource performance with sub-annual performance periods, in a way that improves overall market efficiency and resource adequacy. The timelines for the stakeholder process and implementation likely exceed that under consideration in this CIFP process.
N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...
Company Name	8a. Please enter any questions for Denise Foster Cronin (EKPC) regarding their proposed package.
AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads

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	component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads? 4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the establishment of an interconnection queue for large loads), how would those enhancements (and that establishment) impact or implicate the Load Serving Entities, since they have the obligation to serve the end use customers who have reached out to them for those large load interconnections?
Duke Energy Business Services LLC & Affiliates	1. What does the state process look like? What if there are different opinions on the likelihood of an LLA? 2. How does a company conclude an LLA is duplicative?
Company Name	8b. Please enter any comments for Denise Foster Cronin (EKPC) regarding their proposed package.
Duke Energy Business Services LLC & Affiliates	The 3rd party process appears to be an added expense that may not improve the process.
Delaware Public Service Commission (staff)	No further comments, as this proposal is essentially unchanged from the previous proposal.

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N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...
Company Name	9a. Please enter any questions for Joe Bowring (IMM) regarding their proposed package.
AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads? 4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the establishment of an interconnection queue for large loads), how would those enhancements (and that establishment) impact or implicate the Load Serving Entities, since they have the obligation to serve the end use customers who have reached out to them for those large load interconnections?
Company Name	9b. Please enter any comments for Joe Bowring (IMM) regarding their proposed package
N/A	Agree that you can't sign up load when there isn't enough supply. It needs to be linked.

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Delaware Public Service Commission (staff)	The Delaware PSC staff are generally supportive of the long term goals of the IMM package. New supply equal to new large loads are a necessary component of an enduring solution to today's challenges caused by the enormous levels of recent and continuing data center load growth. Voluntary options alone DO NOT SOLVE RESOURCE ADEQUACY CHALLENGES. While some energy only and demand side programs, in moderation, may help get PJM over the hump, such programs should be firmed-up with firm supply resources [with CIRs] to stabilize resource adequacy long term.
N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...
Company Name	10a. Please enter any questions for Tom Rutigliano and Claire Lang-Ree (NRDC) regarding their proposed package.
Duke Energy Business Services LLC & Affiliates	One of the plan's stated aims is to mitigate load forecast risk on costs. The proposal then states advocate for "simple objective changes to load forecasting" but doesn't outline these changes. What changes to the load forecast process are being proposed?

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Stakeholder Survey Responses

AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads? 4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the establishment of an interconnection queue for large loads), how would those enhancements (and that establishment) impact or implicate the Load Serving Entities, since they have the obligation to serve the end use customers who have reached out to them for those large load interconnections?
Company Name	10b. Please enter any comments for Tom Rutigliano and Claire Lang-Ree (NRDC) regarding their proposed package.
Delaware Public Service Commission (staff)	The NRDC proposal is one of the few end to end, complete proposals that ensures reliability, as it does not solely rely on voluntary supply or demand solutions. In order to add to the level of optionality for large load customers to meet their resource adequacy requirements, NRDC added the BIGPAL “90 day interconnection” proposal to enable energy-only resources to enhance the opportunity for these customers to avoid curtailments and minimize transmission upgrades. We believe this added tool is a good temporary mechanism to enable supply to meet demand in the near future. With that said, over time, these facilities should transition to full capacity resources so that their contribution to reliability is on par with existing generation.

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N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...
Company Name	11a. Please enter any questions for Adrien Ford (Constellation) and Brian George (Google) regarding their proposed package.
N/A	How does this proposal ensure that no costs are paid for by other existing ratepayers?
Duke Energy Business Services LLC & Affiliates	What will the business experts review? The load forecast? Inputs or constraints for the modeling?
AEP Appalachian Transmission Company, Inc.	1. Which parts of your proposal apply or do not apply to vertically-integrated utility states such as Indiana that are served by FRR entities, especially if your proposal includes mandatory and/or voluntary curtailments or penalties? Conversely, how would your proposal apply to fully-deregulated utility states such as Ohio? 2. To the extent your proposal includes a BYOG by large loads component (or supports a BYOG by large loads component proposed by others), please specify the role and implications for Load Serving Entities, since they have been granted authority or have an obligation pursuant to state or local law, regulation, or franchise, to sell electric energy to end user customers, including to large loads? Please explain how your BYOG by large loads proposal would be implemented in vertically-integrated utility states such as Indiana, and separately, in fully-deregulated utility states such as Ohio? 3. To the extent your proposal considers new load and new generation evaluated through separate interconnection processes, is your proposal transitional and how would these generation resource ultimately become Capacity Resources as described in the PJM tariff? To the extent your proposal includes or supports the establishment of a PJM load interconnection queue for large loads, how do you plan to address the jurisdictional question regarding whether state or federal regulations would apply over that PJM interconnection process for large loads? 4. To the extent your proposal includes or supports enhancements to the Load Forecast process, (or to the

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Company Name	11b. Please enter any comments for Adrien Ford (Constellation) and Brian George (Google) regarding their proposed package.
N/A	Will you be providing additional detail around what you believe is a "meaningful/verifiable commitment" or will this be an evidentiary burden to be satisfied by a utility during the annual large load adjustment process? Regarding the "reality check" have the implications of load forecasts being reduced too much based on external factors that prove wrong? Would this simply shift risk to the energy markets rather than capacity? Matrix, line 15 - what is the referenced "option in E2" that would bring BRA clearing back to 98% of RR? I recall discussion of a multi-year commitment process for certain eligible units but do not see those components in the matrix as a backstop alternative. Please share where those components are located or if they will be added.
Delaware Public Service Commission (staff)	No significant changes were made to this proposal, which relies on several voluntary solutions, including new flexible demand response solutions which would likely be very complex to implement [as it requires an almost unlimited number of new limited DR products], a reliability backstop proposal that may or may not procure additional supply, and which may result in capacity prices paid by all load, including existing customers, at the maximum price for multiple years, and which hints at price cap extensions to make up for its design deficiencies. Again – this proposal will not ensure reliability, and will likely impose high costs on existing customers – who are struggling to pay their existing electricity bills.
N/A	I think the goal is to add as much new load and generation as quickly as possible, however mom and pop should not end up subsidizing or footing the bill...any upgrades to transmission, distribution and the like (any cost that might ultimately be passed on to mom and pop) should be paid for upfront. To protect the public in case of a bankruptcy the local utility should not be able to rate base the missing money...I like the idea of a substantial penalty for not showing up with expected load.... generators are at risk of substantial penalties for not performing....so should these large load developers...