

**MC Legal Report
Summary of Significant Filings, Legal Activity
and
Federal Energy Regulatory Commission (Commission) and Court Orders
(Sep. 17, 2025 – Oct. 10, 2025)**

ORDERS

On October 10, 2025, in Docket No. ER25-3194-000, the Commission issued an Order accepting PJM's minor amendment to the Consolidated Transmission Owners Agreement to update the listing of Virginia Electric and Power Company to reflect its currently used trade name of Dominion Energy Virginia. PJM's amendment becomes effective as of October 15, 2025.

On October 2, 2025, in Docket No. ER25-3095-000, the Commission issued an Order accepting PJM's submission on behalf of FirstEnergy Service Company (FirstEnergy), on behalf of Potomac Edison Company a transmission rate incentive request for authorization to recover 100 percent of CWIP in rate base during construction for certain transmission projects identified by PJM. The application is effective October 6, 2025.

On October 1, 2025, in Docket No. ER25-3104-000, the Commission issued an Order accepting PJM's ministerial clean-up filing to correct an eTariff metadata error involving Tariff, Schedule 12-Appendix A, section 34. PJM's ministerial clean-up filing becomes effective as of June 26, 2025.

On September 30, 2025, in Docket No. ER25-3018-000, the Commission issued an Order accepting PJM submission on behalf of Exelon Corporation (Exelon), on behalf of Baltimore Gas and Electric Company, a request for authorization to recover 100 percent of Construction Work in Progress costs in rate base that are related to the construction of new major baseline wholesale electric transmission projects approved by the PJM Board of Managers as a result of the 2022 Regional Transmission Expansion Plan Window 3. The application is effective on October 1, 2025.

On September 18, 2025, in Docket No. RD25-7-000, the Commission issued an Order approving Northern American Electric Reliability Corp.'s (NERC) proposed Reliability Standard EOP-012-3 (Extreme Cold Weather Preparedness and Operations).

On September 18, 2025, in Docket No. ER25-3145-000, the Commission approved non-substantive, clerical and ministerial revisions originating from the Governing Document Enhancement & Clarification Subcommittee (GDECS Filing) to correct, clarify, and/or make consistent certain Generation Interconnection Process-related provisions of the PJM Tariff, Part VII through PJM Tariff, Part IX. As part of the filing, PJM requested a shortened seven-day comment period and expedited action by the Commission by September 12, 2025, to allow the revisions to be incorporated into PJM's pro forma service agreements prior to the start of the Final Agreement Negotiation Phase for Transition Cycle 1, which is scheduled to commence on September 22, 2025. The revisions are effective date as of August 12, 2025, one day after the date of this filing.

FILINGS

On October 10, 2025, PJM submitted a request to the Department of Energy for an Order pursuant to Federal Power Act, Section 202(c) to authorize the continued operation of Wagner Unit 4 beyond an existing Operating Limit in certain limited circumstances described in the request. PJM requested that the Department of Energy issue an Order as soon as possible, given the expiration of the currently effective 202(c) Order on October 26, 2025. In Docket No. ER24-1787, the Federal Energy Regulatory Commission has already accepted a Settlement Agreement detailing the rate and cost allocation methodology to be used for the operation of Wagner Unit 4 pursuant to a Section 202(c) Order.

On October 10, 2025, in Docket No. ER26-98-000, PJM submitted a ministerial clean-up filing to ensure that the eTariff records correctly reflect the language in the PJM Tariff, Article 1, Definitions E - F that was accepted by the Commission in various dockets with various effective dates.

On October 9, 2025, in Docket No. ER26-34-000, PJM filed a Protest to Hexagon Energy, LLC's request of a limited waiver of PJM Tariff, Part VII, section 313(A)(1)(a), which governs the calculation of Security that a Project Developer must post before the close of Decision Point III in Order to remain in a Transition Cycle No. 1 and proceed through the Final Agreement Negotiation Phase.

On October 8, 2025, in Docket No. EL26-4-000, Voltus, Inc. and Mission:data submitted an FPA section 206 complaint against PJM alleging that the existing rule that require actual meter data for residential customers to participate as demand response is unjust and unreasonable. The complainants request that the Commission allow Curtailment Service Providers to use a statistical sampling method if the Curtailment Service Providers submit to PJM a sworn declaration that interval meter data is not reasonably available from the electric distribution companies and including the efforts undertaken to obtain data.

On October 7, 2025, in Docket No. ER26-59-000, PJM electronically submitted to Commission-proposed reforms to PJM's Open Access Transmission Tariff and the Amended and Restated Operating Agreement of PJM pertaining to reforms to PJM's uplift credit, deviation rules, and other market settlements rules.

On October 6, 2025, in Docket No. ER26-39-000, PJM submitted proposed revisions to PJM's Reliability Assurance Agreement Among Load Serving Entities to allow for cost recovery of Department of Energy Section 202(c) Orders issued to address PJM's nationwide resource adequacy concern and where the unit owner of such resource agrees to a rate that is based on the Deactivation Avoidable Cost Credit. PJM requested an effective date for the revisions of August 28, 2025.

On October 3, 2025, in Docket No. ER25-1073-001, PJM submitted a further compliance filing pursuant to the Commission's August 4 Order on PJM's Order No. 904 compliance filing regarding reactive power compensation, which directed PJM to remove certain language from Tariff, Schedule 2. PJM requested an effective date of June 1, 2026, in accordance with the effective date previously accepted by the Commission in the August 4 Order.

On October 3, 2025, in Docket No. ER24-2255-002, PJM submitted on behalf of NextEra Energy Transmission MidAtlantic, Inc. (NEET MidAtlantic) a compliance filing pursuant to the Commission's September 3, 2025 Order in this proceeding. NEET MidAtlantic requests that the Commission accept this compliance filing effective August 12 2024, consistent with the effective date established by the Commission's August 8, 2024 hearing Order.

On October 2, 2025, in Docket No. ER06-78-000, PJM submitted an informational filing to provide the 2026 annual budget of the Organization of PJM States, Inc.

On October 2, 2025, in Docket No. ER16-561-000, PJM submitted an informational filing to provide the 2026 annual budget of the Consumer Advocates of PJM States, Inc.

On October 1, 2025, in Docket No. ER26-5-000, PJM submitted proposed Tariff revisions to eliminate “First-Use” for distribution-level interconnections. The requested effective date for the Tariff revisions is April 28, 2026.

On September 30, 2025, in Docket Nos. ER25-2653-001 and AD25-15-001, PJM filed a motion for leave to answer and answer to the September 15, 2025 requests for rehearing of the PJM Industrial Customer Coalition and Public Interest Organizations seeking rehearing of the Commission’s August 15, 2025 Order in Docket Nos. ER25-2653-001 and AD25-15-001.

On September 26, 2025, in Docket No. ER25-3541-000, PJM submitted a compliance filing to modify Operating Agreement, Schedule 2, section 5 to comply with the directives of the Commission’s August 14, 2025 Order in Docket No. EL24-91-000. PJM requested the Tariff revisions be effective December 5, 2025.

On September 26, 2025, in Docket No. ER25-3352-001, PJM submitted on behalf of PPL Electric, an amendment to an August 29, 2025 filing to correct an inadvertently uploaded redline version of tariff record.

On September 26, 2025, in Docket No. ER25-3352-002, PJM submitted on behalf of PPL Electric, an amendment to an August 29, 2025 filing to correct an inadvertently uploaded redline version of tariff record.

On September 24, 2025, in Docket No. ER25-3375-000, PJM submitted comments regarding Cordova Energy Co., LLC's Waiver Request for exception from PJM's Capacity Must Offer Requirement or, in the alternative, for limited waiver of Tariff and request for expedited action.

On September 19, 2025, PJM submitted a compliance report in accordance with the Secretary of Energy of the Department of Energy’s Order No. 202-25-8, issued August 27, 2025. The compliance report relates to the operations of Eddystone Unit 3 and Eddystone Unit 4, and measures PJM and Constellation Energy Generation have taken and continue to take to ensure that the Eddystone Units are available to operate for the duration of the Order.

On September 19, 2025, in Docket No. ER25-3476-000, PJM and New York Independent System Operator, Inc., (NYISO) jointly submitted proposed revisions to the Joint Operating Agreement (JOA) between NYISO and PJM that is set forth in Attachment CC to the NYISO’s Open Access Transmission Tariff. The proposed revisions in this filing add two non-common Phase Angle Regulators (“PARs”) to the list of facilities modeled in the Market Flow calculation to support an effective Market-to-Market (“M2M”) coordination process. PJM and NYISO request that the revisions be effective as of November 19, 2025.

On September 18, 2025, in Docket No. ER25-3469-000, PJM submitted clerical and ministerial markets-related revisions originating from the Governing Document Enhancement & Clarification Subcommittee (the GDECS Filing) to correct, clarify, and/or make consistent certain markets-related provisions of the PJM

Tariff and Operating Agreement. PJM requested that the revisions become effective as of November 18, 2025.

On September 17, 2025, PJM submitted a compliance report in accordance with Ordering Paragraph B of the Secretary of Energy of the Department of Energy's Order No. 202-25-8, issued August 27, 2025. The compliance report relates to the operations of Eddystone Unit 3 and Eddystone Unit 4 on September 16, 2025.