PJM's Response Matrix to the Large Load Show Cause Order Opportunities

What follows is a matrix identifying the show cause order opportunities set forth in the Commission's June 18 large load show cause order directed to PJM and the PJM Transmission Owners, along with additional information about PJM's response. On or about November 16, 2026, PJM will make several Federal Power Act, Section 205 filings that will address the opportunities noted here. One of those filings will address large load ride through requirements, and another filing will address the bulk of the reforms PJM is pursuing and that will address the show cause order's identified opportunities. The precise number and structure of the filings remain subject to change. Over the past few months, PJM has posted explanatory materials and draft governing document language relating to PJM's Section 205 filings on this matter. PJM continues to develop and refine Tariff (and other governing document) language in anticipation of this filing. Any posted language draft governing document language remains subject to revision.

Show Cause Opportunities	PJM Response
Show cause as to why the Tariff remains just and reasonable and not unduly discriminatory or preferential without Tariff provisions addressing each of the provisions listed below or explain what changes are needed to remedy the identified items. LLSCO ¶¶ 3(1)(a), 3(2).	Specific issues addressed below.
To avoid disrupting existing commercial arrangements, tariff revisions should: (a) propose a reasonable implementation period to ensure minimal disruption to such existing commercial arrangements, and (b) allow a reasonable amount of time to finalize ongoing agreements that are nearing completion as of the date such Tariff provisions are filed with the Commission. LLSCO ¶ 5.	Statutorily-set refund effective dates have been established. Existing commercial arrangements are negotiated against the backdrop of, among other things, refund effective dates, principles of physics, Good Utility Practice, and obligations to comply with applicable laws, standards, and regulations. PJM is proposing reasonable implementation periods, consistent with safe and reliable system operations, and the need to upgrade, develop, and stand up a range of systems to accommodate the new transmission services and planning processes.

Show Cause Opportunities	PJM Response
	The new study process will apply to requests submitted after the specified effective date.
Application Process	
Tariff provisions for: (1) an application process that accepts Eligible Customers' applications for transmission service on behalf of large loads on a rolling basis; (2) a non-refundable application fee and sufficient readiness requirements that escalate at distinct phases of the study process to deter duplicative or speculative requests for transmission service (e.g., meaningful milestones and/or financial commitments); and (3) information and data requirements that Eligible Customers must submit to PJM and/or the Transmission Owners regarding the characteristics of the large load on behalf of which the Eligible Customer is taking transmission service, including disclosure to PJM of any substantially similar pending transmission service requests on behalf of the same large load customer. LLSCO ¶ 59.	Proposed new application and study process, along with other related reforms, have been previewed in Part VIII, draft Tariff language posted here: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tarrif-part-viii-revisions---redline.pdf
Large Load Study Procedures	
Tariff provisions recognizing within the transmission service request study process the unique operational characteristics of large loads that are willing and able to limit their energy withdrawals under certain conditions, which may thereby lessen or potentially avoid the need for certain Network Upgrades. LLSCO ¶ 60.	New study process that studies generation and load together will be proposed. Draft tariff language posted here: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tarrif-part-viii-revisions---redline.pdf
Tariff provisions that: (1) require the evaluation of alternative transmission technologies in transmission service request studies, using	

Show Cause Opportunities	PJM Response
models that are capable of evaluating the transmission system to accurately account for advanced transmission technologies, in all instances, without the need for a request from the Eligible Customer seeking transmission service on behalf of a large load; and (2) if traditional Network Upgrades are selected instead of alternative transmission technologies, inclusion in the study report to the Eligible Customer seeking transmission service on behalf of a large load of a sufficiently clear demonstration of why alternative transmission technologies are not feasible (i.e., would not resolve reliability violations identified or meet the relevant planning criteria) or would not result in lower costs or a faster timeline for accommodating the transmission service request. LLSCO ¶ 62.	PJM, in partnership with the PJM Transmission Owners, will evaluate alternative transmission technologies in its transmission service request studies and will update Tariff language to reflect this.
Tariff provisions: (1) to evaluate the impact of providing the requested transmission service to Eligible Customers on behalf of large loads, including identifying the Direct Assignment Facilities and Network Upgrades necessary to provide such service reliably; (2) to appropriately recognize within the transmission service study process the unique operational characteristics of large loads; (3) a study deadline of no more than 60-90 calendar days. LLSCO ¶ 63.	Proposed new study process, along with related reforms, have been previewed in Part VIII, draft Tariff language posted here: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tarrif-part-viii-revisions---redline.pdf
Operational Requirements	
Tariff provisions that: (1) Address ongoing operational requirements for transmission customers taking transmission service on behalf of large loads given the unique nature of these large loads creates challenges for operation of the transmission system and necessitates greater	Ride through requirements specific to large computational loads are previewed in Tariff, Part III, section 28.2 and Part XI, section 705.8 to be proposed. Draft tariff language posted:

Show Cause Opportunities		PJM Response
	visibility and operational control when providing transmission service to transmission customers on behalf of large loads, without which the reliability of the transmission system could be at risk. LLSCO ¶ 64.	https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-iii-nits---redline.pdf https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf
(2)	Specify requirements for necessary control technologies and/or protection systems that may be necessary to limit a transmission customer's withdrawals from the transmission system as appropriate. LLSCO ¶ 64.	These provisions were included in the Co-Located Load compliance filing submitted August 17 for Interim NITS. Similar provisions for contract demand services to be proposed in Part XI on November 16. Revisions to pending compliance filings and transmission service language will be proposed as necessary to harmonize the filings. Preview Part XI, section 710.4 of the draft tariff changes: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf
(3)	Require transmission customers to provide PJM hourly forecasts, telemetry data, and other data to ensure sufficient visibility or specify requirements for maintaining communication channels between PJM and the transmission customer on behalf of the large load. LLSCO ¶ 64.	These provisions were included in the Co-Located Load compliance filing submitted August 17 for Interim NITS. Similar provisions for contract demand services to be proposed in Part XI on November 16. Revisions to pending compliance filings and transmission service language will be proposed as necessary to harmonize the filings. Preview Part XI, sections 710.4 and 710.5 of the draft tariff changes: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf

Show Cause Opportunities	PJM Response
(4) Require transmission owners to install, and transmission customers to pay for, equipment to enable PJM to monitor large loads for impacts of, for example, fast-ramping load that may impact the transmission system too quickly to be captured by conventional data acquisition systems (e.g., the need for phasor measurement units or similar equipment). LLSCO ¶ 64.	Provisions regarding telemetry requirement to monitor system impacts were included in the Co-Located Load compliance filing submitted August 17 for Interim NITS. Similar provisions for contract demand services to be proposed in Part XI on November 16. Revisions to pending compliance filings and transmission service language will be proposed as necessary to harmonize the filings. Preview Part XI, sections 710.4 and 710.5 of the draft tariff changes: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf PJM is working to develop operational requirements for fast-ramping load that may impact the transmission system too quickly to be captured by conventional data acquisition systems. Those requirements will be based on a ramping study PJM will be conducting in 2027. Further, PJM is intending to also address in 2027 Electromagnetic Transient ("EMT") issues. To the extent necessary, PJM will return to the Commission with submissions on these matters.
(5) Require the transmission customer to enable PJM to remotely disconnect large loads when necessary to maintain reliability of the transmission system, with the costs of such equipment directly assigned to the transmission customer, as well as the terms and conditions under which PJM may remotely disconnect the large load (e.g., emergency conditions, so that transmission equipment is not harmed). LLSCO ¶ 64.	These provisions were included in the Co-Located Load compliance filing submitted August 17 for Interim NITS. Similar provisions for contract demand services to be proposed in Part XI on November 16. Revisions to pending compliance filings and transmission service language will be proposed as necessary to harmonize the filings. See Part XI, section 710.4 of the draft tariff changes: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf

Show Cause Opportunities	PJM Response
(6) Specify ramp rate or ride-through requirements with which the transmission customer taking transmission service on behalf of the large load must comply. LLSCO ¶ 64.	Proposed ride through requirements for large computational load included in Part III, section 28.2 and Part XI, to be proposed November 16: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-iii-nits---redline.pdf https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf PJM is working to develop ramp rate requirements for customers taking service on behalf of large load, based on a study to be conducted in 2027. Further, PJM is intending to also address in 2027 Electromagnetic Transient ("EMT") issues. To the extent necessary, PJM will return to the Commission with submissions on these matters.
Pro forma provisions in a transmission service agreement between PJM and the transmission customer taking transmission service on behalf of a large load to memorialize the ongoing operational requirements (e.g., equipment requirements, data requirements, remote disconnect capability). LLSCO ¶ 65.	PJM added a placeholder in the transmission service agreement for necessary control technologies. Preview Part XI, Attachment F-4 for contract demand services. Otherwise, PJM is adding tariff language specifying operational, data, and other requirements in Part XI for the new transmission services. https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf
Information Posting	

Show Cause Opportunities	PJM Response
Consistent with PJM/TO's filing rights, Tariff provisions requiring the robust, accurate, and systematic provision of data on PJM's website in a single location, and in an easily accessible format that is searchable and allows users to filter the data, regarding the cost for Network Upgrades needed to provide transmission service to Eligible Customers on behalf of large loads. LLSCO ¶¶ 73-74, 76.	PJM will use its planning data on Network Upgrades and their capital costs and also leverage information from the FERC-approved Large Load Registry to populate a Large Load dashboard on pjm.com that will consolidate information in a single location. The dashboard will provide information concerning the cost for Network Upgrades needed to provide transmission service to Eligible Customers on behalf of Large Loads in a manner consistent with the description of this show cause opportunity.
Tariff provisions to require PJM/TOs to publicly post and regularly update data that details: (1) the aggregate amounts of proposed large load additions in PJM's footprint, including the aggregate amounts in each transmission pricing zone; (2) the planned Network Upgrades needed to provide transmission service to Eligible Customers on behalf of large loads, identified by type of equipment and Network Upgrade (e.g., new substation, reconductoring, a new high-voltage transmission line) for each transmission service request; and (3) cost estimates for those Network Upgrades. LLSCO ¶ 76.	PJM will add to the appropriate posting and metrics provisions of the Tariff the required data on all planned Interconnection Reliability Reinforcements (a term being introduced as part of the reforms) needed to provide transmission service to Eligible Customers on behalf of large loads, identified by type of equipment, new substation, reconductoring, a new high-voltage transmission line) for transmission service requests
Cost Recovery Agreement	
A *pro forma* cost recovery agreement between PJM, the relevant transmission owner, and the Eligible Customer taking transmission service on behalf of a large load, or to propose Tariff revisions to provide additional transparency and establish such a *pro forma* cost recovery agreement. LLSCO ¶¶ 67, 77.	The PJM Transmission Owners are addressing cost recovery issues, including the cost recovery agreement. See notice to Members Committee available here: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-04---pjm-to-large-load-mc-consultation-notice.pdf
A cost recovery agreement that: (1) requires the Eligible Customer to make a minimum contribution toward the transmission owner's transmission revenue requirement, if the Eligible	The PJM Transmission Owners are addressing cost recovery issues, including the cost recovery agreement. See notice to Members Committee available here:

Show Cause Opportunities	PJM Response
Customer ultimately takes less transmission service than anticipated because the large load does not materialize as planned or is not developed at all. LLSCO ¶ 81.	https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-04---pjm-to-large-load-mc-consultation-notice.pdf
(2) bases the minimum contribution on the level of jurisdictional transmission service (in MW) requested by the Eligible Customer on behalf of the large load. LLSCO ¶ 83	The PJM Transmission Owners are addressing cost recovery issues, including the cost recovery agreement. See notice to Members Committee available here: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-04---pjm-to-large-load-mc-consultation-notice.pdf
(3) includes a credit support (or other financial security) requirement sufficient to secure the obligations of the Eligible Customer taking transmission service on behalf of a large load to pay the amounts owed pursuant to the cost recovery agreement (however, an Eligible Customer may include a credit support or other financial security posted by a large load as part of a retail agreement to avoid creating duplicative credit support requirements). LLSCO ¶ 83.	The PJM Transmission Owners are addressing cost recovery issues, including the cost recovery agreement. See notice to Members Committee available here: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-04---pjm-to-large-load-mc-consultation-notice.pdf
A mechanism to ensure payments made under the cost recovery agreement are appropriately credited toward transmission owners' transmission revenue requirements consistent with the Commission's cost-of-service regulations. LLSCO ¶ 3(1)(b).	The PJM Transmission Owners are addressing cost recovery issues, including the cost recovery agreement. See notice to Members Committee available here: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-04---pjm-to-large-load-mc-consultation-notice.pdf
Definitions	

Show Cause Opportunities	PJM Response
Tariff provisions to define large load (i.e., as a new category of load, which includes a load size and interconnection voltage threshold, should be based on the characteristics of PJM's transmission system). LLSCO ¶ 58.	Large Load definition proposed and accepted as part of the IRAS filing. *PJM Interconnection, L.L.C.*, 197 FERC ¶ 61,019, at P 13 (2026).
Tariff provisions to define Flexible Large Load (e.g., as a subset of large loads that are not co-located with generation, but are willing and able to limit their energy withdrawals from the transmission system under certain conditions). LLSCO ¶ 85.	PJM is not proposing a specific definition of Flexible Large Load, but rather is conditioning the new transmission services on an Eligible Customer's ability to limit withdrawals from the Transmission System. See Part XI.
Tariff provisions to define "electrically proximate large load" to mean a large load (as defined in the order), that is sufficiently electrically close to the interconnection customer's requested point of interconnection, such that the impact on the transmission system of the combination of the generating facility and the load, with the exception of the transmission facilities between the two, will be effectively the same as if they were located at the same substation (e.g., large load that is located no more than two substations away from the generating facility). LLSCO ¶ 94.	Due to the new study process PJM is proposing in Part VIII, PJM does not intend to separately define electrically proximate large load. The new study process will evaluate upgrades needed to accommodate transmission service and generation in the same process to capture efficiencies, including those associated with electrical proximity.
Transmission Services	
Tariff provisions for Eligible Customers to take the new transmission services on behalf of flexible large loads, including: (1) an interim non-firm network transmission service while Network Upgrades are being constructed (i.e., interim NITS) and (2) permanent firm and non-firm contract demand transmission services (transmission service up to a specified MW quantity, i.e., the contract level, on a firm or non-firm basis). LLSCO ¶ 87.	Revisions to expand interim NITS and firm and non-firm contract demand services to Large Loads to be proposed November 16, including necessary changes to the terms and conditions of such service based on their extension and expanded scope. Revisions to pending compliance filings and transmission service language will be proposed as necessary to harmonize filings. Draft Part XI tariff language posted: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf

Show Cause Opportunities	PJM Response
Commission encouraged PJM to consider what type of transmission service an Eligible Customer will need to take on behalf of the electrically proximate large load or large co-located load. LLSCO ¶ 101.	PJM proposes to allow Eligible Customers to take either interim NITS and NITS or non-firm CDS and firm CDS on behalf of large loads. Proximity between generation and load will be addressed through the Fast Energization study process being proposed in Part VIII. Previews of Part VIII and Part XI redlines are available at: https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tarrif-part-viii-revisions---redline.pdf https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf
To what extent would PJM allow an interconnection customer's generating facility serving electrically proximate large load or large co-located load to participate in PJM's energy and ancillary services market, and if PJM were to allow them to participate, what restrictions or mitigation would PJM apply. LLSCO ¶ 109.	Generally, a generating facility serving electrically proximate load (e.g., Co-Located or load with BTMG) may participate in the energy markets provided they are not capacity resources. See proposed tariff changes at Part XI, section 710.1(viii). https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20261026/20261026-item-02---tariff-part-xi-new-transmission-services---redlines.pdf
To the extent that PJM plans for the electrically proximate large load or large co-located load associated with an interconnection customer's generating facility for resource adequacy purposes, would PJM account for the generating facilities serving electrically proximate large load or large co-located load in the resource adequacy construct? If applicable, would PJM allow	In general, firm service being taken by Eligible Customers on behalf of large loads will be planned for in PJM's resource adequacy construct. If an Eligible Customer is not taking firm transmission service for a part of its load (for example, because a particular generator is being used to net against that part of the load), PJM will

Show Cause Opportunities	PJM Response
the generating facilities serving electrically proximate large load or large co-located load to participate in PJM's capacity market? If so, would PJM accredit these generating facilities using the same method as other PJM generating facilities? LLSCO ¶ 109.	(1) not procure capacity for that load and (2) that generation being used to serve that load cannot be sold into the capacity market. PJM will address consideration of the new transmission services for purposes of the capacity market treatment and in the day ahead and real-time markets, and in resource adequacy targets. PJM will address capacity market participation eligibility, and the award of Capacity Interconnection Rights, for generators serving large loads and co-located loads in certain configurations. At minimum, for any generation megawatts dedicated to serve a particular load, such megawatts will not be eligible to receive Capacity Interconnection Rights. The amount of any resource sold into the capacity market will be accredited as any other capacity resource.
Generator Interconnection Process for Electrically Proximate Load	
Tariff provisions that establish: (1) a new generator interconnection study process and new interim generator interconnection service that reflect an interconnection customer's commitment, in a generator interconnection agreement, to limit a generating facility's output to match the hourly forecast of an electrically proximate large load or large co-located load; (LLSCO ¶ 100) or	PJM will evaluate generators dedicated to serving co-located load in co-location arrangements. Otherwise, PJM will study system reinforcements needed to accommodate both new generation interconnection requests and transmission service for new large loads as part of a combined study process.
(2) a generator interconnection study process that allows the use of the existing ERIS or NRIS of an existing generator to connect a new generating facility and a new large load behind the same point of interconnection of the existing generator with necessary control technologies and/or protection systems, which may include a special protection scheme, that ensures	PJM plans to study such zero injection requests for service involving an existing generator through the Necessary Studies process.

Show Cause Opportunities	PJM Response
that the net injection does not exceed the amount in the existing generator interconnection agreement; (LLSCO ¶ 100) or	
(3) a new generator interconnection service that allows a new generating facility and new large co-located load seeking to interconnect behind the same new point of interconnection with necessary control technologies and/or protection systems, which may include a special protection scheme, to ensure that there is no injection to the transmission system. LLSCO ¶ 100.	To the extent not already permitted under the Tariff, PJM will continue to evaluate this potential opportunity and PJM intends to file a proposal addressing this opportunity.
Transmission Planning	
What, if any, potential impacts on regional and local transmission planning would arise from the introduction of the new transmission services discussed herein? For example, when planning for load growth, how would transmission providers and planners account for flexible large loads' potential preference to take the new transmission services, including potential uncertainties around the type, location, and quantity of such expected loads? LLSCO ¶ 106.	PJM is developing Tariff and Reliability Assurance Agreement revisions to account in its planning process for the new services being taken by Eligible Customers on behalf of large loads. See also prior responses, above.

*PJM has posted proposed revisions to the Generator Interconnection Agreement that will streamline that *pro forma* agreement. Those proposed revisions can be previewed here. PJM will file these revisions in a separate Section 205 filing on some date after November 16, 2026.