Compliance Checklist for June 18, 2026 Rehearing Order on Co-Located Load

As noted in PJM's Response Matrix to the Large Load Show Cause Order Opportunities, PJM intends to submit revisions to pending compliance filings and transmission service language as necessary to harmonize the previously-submitted co-located load compliance filings with their expanded scope as contemplated by the large load show cause order.

Issue	Compliance Directive	Status
Transmission Service Options for BTMG (PP 88 – 91)	Revise Tariff to add a definition of Eligible Load (i.e., Co-Located Load and/or load with BTMG) or make other changes to eliminate the requirement that Eligible Customers taking service on behalf of load with BTMG take NITS. (P 91).	Added definition of Eligible Load in 8/17 filing (proposed 10/17 effective date but no action). Revising definition of Eligible Generation per feedback on 8/17 compliance filing in 11/16 filing.
Transmission Service Options for BTMG (PP 88 – 91)	Revise definition of BTMG to allow Eligible Customers with BTMG that are willing/able to limit withdrawals under certain conditions to take the new transmission services. (P 91).	Revised BTMG definition in 8/17 filing (proposed 10/17 effective date but no action).
Replacement Rate: Transmission Services – BTMG (PP 100-103)	Revise Tariff to require that Eligible Customer taking transmission service on behalf of Eligible Load must take at least one of three transmission services: (1) NITS or Interim NITS, (2) FCD transmission service, or (3) NFCD transmission service. Eligible Customer may take a combination of FCD and NFCD transmission services. (PP 102-103).	To be addressed in 11/16 filing: • Language to be added to Part III NITS Preamble • Revised Part XI to reference "Eligible Load" instead of Co-Located Load
Replacement Rate: BTMG (PP 137-142)	Propose a process to exempt certain cogeneration QFs from the new retail BTMG netting rules if they demonstrate that they are integrated with load such that, when their generating facility trips offline, the load follows, and they thus do not present the reliability or resource adequacy concerns. In developing its compliance proposal, PJM must ensure that the requirements for a cogeneration QF to make this demonstration are not unduly burdensome. (PP 142, 240).	To be addressed in 11/16 filing: • Tariff, Part III, Section 34.2 on netting BTMG posted for stakeholder feedback; • RAA Schedule 8 also being revised to address netting.

BTMG Rules: Materiality Threshold (PP 181-220)	Revise proposed definition of Retail BTMG in the Tariff to create a materiality threshold that allows Network Customers to net from their Network Load up to 50 MW of load served by using BTMG at a single electrical location. (PP 207, 220).	8/17 filing, proposed to add definition to Retail Behind the Meter Generation. 11/16 filing to include: • Part III, Section 34.2 netting provisions for BTMG to limit netting • Revised Part I, definition of Retail BTMG to remove back up generation • Revisions to RAA Schedule 8 to carry through netting to settlements
Transmission Service (PP 247-268)	Reject the Tariff provisions proposing that Co-Located Load that is not served by an Eligible Customer taking transmission service on its behalf "must take all necessary steps to disconnect from the Transmission System," as this provision duplicative of PJM's proposed changes to Part VIII, Subpart B, section 403(A)(1)(r)(iv). (P 264).	Addressed in 8/17 filing: Revised Tariff, Part III (General) (4.0.0) to remove this provision (proposed 10/17 effective date)
Necessary Studies (PP 269-288)	Revise Tariff to specify what types of additional detail about the Necessary Studies will be available in the PJM manuals. (P 280).	Addressed in 8/17 filing
Necessary Studies (PP 269-288)	Revise Tariff to remove the requirement for Interconnection Customers with existing ISAs pursuant to Part VI of the Tariff and GIAs pursuant to Part VII of the Tariff to enter into a new *pro forma* GIA and add duplicate Necessary Study Tariff provisions (Part VIII, Subpart A, section 401.H.3) to those sections. (P 284).	Addressed in 8/17 filing Removed provision from Proposed Tariff, Part III (General) (4.0.0) (proposed 10/17 effective date)
Necessary Studies (PP 269-288)	Explain in compliance filing how PJM's changes ensure the prohibition on Interconnection Customers serving Co-Located Loads from existing	Addressed in 8/17 filing

	generators until all required Network Upgrades, necessary control technologies and/or protection systems, and metering identified as necessary are complete and in service, applies to Interconnection Customers with currently effective GIAs, ISAs, and Necessary Study Agreements, in addition to Interconnection Customers seeking new Necessary Study Agreements and GIAs. (P 285).	
Necessary Studies (PP 269-288)	Reject increase in cost for Necessary Studies Agreement. (p 288 n. 681)	Addressed in 8/17 filing
Definition of Co-Located Load (PP 289, 292-293, 297-300)	Revise the Tariff's definition of Co-Located Load to use "Point of Interconnection" instead of "Point of Change in Ownership." (P 308).	Addressed in 8/17 filing (proposed 10/17 effective date): • PJM, Proposed Tariff, § I.1 Definitions C-D (Co-Located Load) (46.0.0) • § VII.A 300, Definitions C (Co-Located Load) (4.0.0) • § VIII.A 400, Definitions C (Co-Located Load) (4.0.0)
GIP, *pro forma* GIA, and Common Service Provisions (PP 290-292, 294-295, 301-302)	Revise the Tariff to: • Remove the following requirement from the definition of Co-Located Generating Facility: "If such a Generation Project Developer has an effective Interconnection Service Agreement pursuant to Tariff, Part VI or a Generation Interconnection Agreement pursuant to Tariff, Part VII, such agreement must be superseded by a Generation Interconnection Agreement pursuant to Tariff, Part VIII and the pro forma GIA in Part IX, Subpart B," • Add to Part III a requirement that Interconnection Customers with ISAs or GIAs executed (or requested to be filed unexecuted) prior to the effective date of the revised generation interconnection procedures and pro forma GIA directed in December Order that wish to add Co-Located Load or are currently serving Co-Located Load publicly notify PJM of that addition and identify the Eligible Customer that will take transmission service on behalf of that Co-Located Load. (P 311).	Addressed in 8/17 filing: • Part VII, Subpart A, section 300 definitions C • Part VIII, Subpart A, section 400 definitions C
Definition of Non-Retail BTMG (PP 296, 303)	Revise the Tariff to remove PJM's proposed revisions to the definition of Non-Retail BTMG consistent with the December Order's determination. (P 314).	Addressed in 8/17 filing by rejecting changes to NRBTMG definition (proposed 10/17 effective date)

Effective Date (PP 316- 319, 581-597)	Submit compliance filing providing additional information on the effective date (P 319) that: • Reconsiders the proposed effective date of June 1, 2029. (P 597). • Explains whether it can make the new transmission services available on different effective dates, including specifically whether Interim NITS and NFCDS transmission services can be made available at an earlier date. (P 597).	Implementation proposal to be addressed in 11/16 filing.
Rates, Terms, and Conditions for FC/NFCD Service: Nature of FCD/NFCD Transmission Services (PP 323- 352)	Revise Tariff to permit Eligible Customers to elect to take FCD/NFCD transmission service ***without*** the following PJM-proposed limitations: (1) the requirement that the Eligible Customer taking transmission service on behalf of a Co-Located Load must take sufficient transmission service to account for the entire gross demand of the Co-Located Load, (2) the requirement for an Eligible Customer taking transmission service on behalf of a Co-Located Load to take FCD transmission service at a level of contract demand that reflects the amount of load not served by the Co-Located Generator, (3) the requirement that an Eligible Customer taking service on behalf of a Co-Located Load must request NFCD transmission service equal to the MW level of the Co-Located Generating Facility dedicated to serving the Co-Located Load if that portion of the Co-Located Load is not covered by FCD transmission service, and (4) the restriction on the use of NFCD transmission service to only those circumstances where the Co-Located Generator is on outage). (P 348).	Revising the illustrative Tariff language proposed during paper hearing process to address these requirements as follows: • 709.2(a) to remove requirement to take service up to gross demand • Removed outage requirement from 709.2(b) • 710.3 to remove requirement to take combination of services to cover gross demand
Rates, Terms, and Conditions for FC/NFCD Service: Study Process (PP 353- 375)	***FCD***: Revise Tariff to include more detailed study procedures that mirror the existing study procedures for transmission service on compliance, as PJM's proposal is vague and unclear. (P 370).	Study procedures in Part VIII to be updated to address contract demand services in 11/16 Filing
Rates, Terms, and Conditions for FC/NFCD Service: Study Process (PP 353- 375)	Revise Tariff to study requests for FCD transmission service using the same process PJM uses for new service requests for NITS, i.e., the cluster study process. (P 370).	Study procedures in Part VIII to be updated to address contract demand services in 11/16 filing

Rates, Terms, and Conditions for FC/NFCD Service: Study Process (PP 353- 375)	Revise Tariff to study FCD transmission service requests using its existing process for studying firm transmission service requests. Consistent with FERC's determination to extend the three new transmission services to Eligible Customers taking service on behalf of load with BTMG that are willing and able to limit their energy withdrawals from the transmission system under certain conditions, FERC directs PJM to reflect this change in its compliance filing. (P 372).	Study procedures in Part VIII to be updated to address contract demand services in 11/16 filing
Rates, Terms, and Conditions for FC/NFCD Service: Study Process (PP 353- 375)	***NFCD***: Revise Tariff to include study procedures for NFCD transmission service requests. Consistent with FERC's determination to extend the three new transmission services to Eligible Customers taking service on behalf of load with BTMG that are willing and able to limit their energy withdrawals from the transmission system under certain conditions, FERC further direct PJM to reflect this change in its compliance filing. (P 373).	Study procedures in Part VIII to be updated to address contract demand services in 11/16 filing
Rates, Terms, and Conditions for FC/NFCD Service: Study Process (PP 353- 375)	Specify in a compliance filing how transmission owners shall participate in PJM's study process for Eligible Loads for FCD/NFCD transmission services and specify in detail the related roles and responsibilities of PJM and the transmission owners in such studies. (P 375).	To be addressed
Rates, Terms, and Conditions for FC/NFCD Service: Rates and Charges (PP 375-412)	Revise Tariff to: (1) charge Eligible Customers taking FCD and/or NFCD transmission services on behalf of Eligible Loads for all ancillary services other than regulation and black start services based on their contract demand; and (2) charge Eligible Customers taking FCD and/or NFCD transmission services on behalf of Eligible Loads for regulation and black start services based on their gross load. (P 400).	11/16 filing to revise Part XI to reference Eligible instead of Co-Located Load and contract quantity. Revised 714.5 to charge based on contract demand.
Rates, Terms, and Conditions for FC/NFCD Service: Rates and Charges (PP 375-412)	Revise Tariff to charge Eligible Customers taking FCD and/or NFCD transmission services certain administrative charges to reflect this change in it compliance filing. (P 401).	No changes needed from illustrative proposal. To be included in 11/16 filing.
Rate, Terms, and Conditions for FC/NFCD Service: Other (PP 413-430)	Revise Tariff to remove requirement for Eligible Customers requesting FCD or NFCD transmission service to provide an authorization or	Revised the Part XI, section 710.1 illustrative tariff language to remove this requirement. The revised version to be included in 11/16 filing.

	certification from its RERRA affirming that the Eligible Customer is authorized to provide energy to the Co-Located Load. (P 426).	
Rate, Terms, and Conditions for FC/NFCD Service: Other (PP 413-430)	Revise Tariff to add a placeholder section for listing necessary control technologies and/or protection systems to section 5.0 of PJM's proposed Attachment F-4. (P 429).	Revised language in Attachment F-4 to include placeholder for control technologies. To be included in 11/16 filing.
Rate, Terms, and Conditions for FC/NFCD Service: Other (PP 413-430)	Revise Tariff to allow FCD transmission service customers to request Auction Revenue Rights in stage 2 of the allocation process. (P 430).	Appears no changes to illustrative tariff language needed. To be included in 11/16 filing.
Interconnection Requirements and Operational Practices for Necessary Control Technologies and/or Protection Schemes (PP 457-490)	Revise Tariff to require Eligible Customers taking Interim NITS, FCD, and/or NFCD transmission service on behalf of Eligible Loads, to have necessary control technologies and/or protection systems. (P 481).	Revised 708 (c) to include Firm CDS
Interconnection Requirements an Operational Practices for Necessary Control Technologies and/or Protection Schemes (PP 457-490)	PJM to submit an explanation of what new and existing interconnection requirements and operational practices it will apply to Eligible Customers taking Interim NITS, FCD, and/or NFCD transmission services on behalf of Eligible Load. (P 482).	Added provisions in Part XI to specify that customers will need to install necessary control technologies or special protection systems where appropriate.
Penalty Charge or Other Remedial Action for New Transmission Services (PP 491-529)	Revise Tariff to: • Remove provisions that disqualify an Eligible Customer from taking any of the new transmission services after the first instance of failing to follow a curtailment or load shedding directive. • Establish an operational penalty whereby, after the second instance of failing to follow a curtailment or load shedding directive, PJM will terminate the transmission service agreement with the Eligible Customer taking Interim NITS, FCD, or NFCD transmission service on behalf of the Eligible Load. (PP 515, 519).	8/17 filing revised 705.6 to reflect the disqualification changes for INITS. This will also be included for contract demand services in the 11/16 filing in Part XI, section 713.7.

	• Provide that Eligible Customer will remain eligible to take the three new transmission services on behalf of other Eligible Loads through its other transmission service agreements. (P 519).	
Penalty Charge or Other Remedial Action for New Transmission Services (PP 491-529)	Revise Tariff to: • Remove provisions imposing disqualification as an operational penalty after one misoperation of necessary control technologies and/or protection systems; • Add provision imposing operational penalty of suspension in service for a period of up to 120 for an Eligible Customer taking Interim NITS, FCD, and/or NFCD transmission service on behalf of Eligible Load after the first misoperation of necessary control technology; (P 523) • Add provision that suspended service may resume following PJM's approval, as well as the relevant transmission owner's approval of the necessary control technologies and/or protection system for consistency with the transmission owner's requirements; (P 524) • Establish an operational penalty whereby, after the second misoperation of necessary control technologies and/or protection systems, PJM will terminate the transmission service agreement with the Eligible Customer taking Interim NITS, FCD, and/or NFCD transmission service on behalf of Eligible Load. (PP 516, 523, 527).	Proposed changes for INITS in 8/17 filing. 11/16 will propose for Firm Contract Demand Transmission Service and Non-Firm Contract Demand Transmission Service
Anti-Toggling Mechanisms for FCD Transmission Service (PP 530- 537)	Revise Tariff to: • Prohibit, for a period of five years, Eligible Customers taking transmission service on behalf of a Co-Located Load from taking NFCD transmission service for any portion of Co-Located Load served by FCD transmission service to ensure that such Eligible Customers do not attempt to switch based on expected capacity market conditions.	Proposal already had five year provision and 42 month termination. Revised 709.4 to eliminate cross reference to exception in 709.2 and removed that provision from 709.2. Revised version to be included in 11/16 filing.

	• Adopt 42-month notice of termination provision applicable to FCD transmission service. (P 535). • Propose an anti-toggling mechanism without an exception for Eligible Customers decreasing FCD transmission service and increasing NFCD transmission service on behalf of Eligible Load. (P 536).	
Communications, Alarm, SCADA, or Other Requirements (PP 538-541)	Revise Tariff to ensure that an Eligible Customer has adequate telemetry, data exchange, and metering requirements such that PJM may monitor the Eligible Load's use of the transmission system, limit withdrawals, and ensure relay settings are consistent with necessary control technologies and/or protection systems. (P 541).	8/17 proposed language for INITS
Curtailment Procedures for Interim NITS/NFCD Transmission Service (PP 542-555)	Revise the Tariff to include the curtailment priorities for Interim NITS, FCD transmission service, and NFCD transmission service consistent with FERC's findings. (P 555).	Section 713.3 already specifies that Firm and NITS treated the same for curtailment Revised Section 713.4 to specify that NFCD shall be curtailed first Additional revisions anticipated in 11/16 filing.
Curtailment Procedures for Interim NITS/NFCD Transmission Service (PP 542-555)	This language must specify that FCD transmission service shall be treated the same as NITS for the purposes of curtailment, and that Interim NITS and NFCD transmission service will be curtailed prior to deployment of PJM's Pre-Emergency Load Response Program, or in response to a transfer capability shortage as a result of system reliability conditions. (P 555).	Section 713.3 already specifies that Firm and NITS treated the same for curtailment Revised Section 713.4 to specify that NFCD shall be curtailed first Additional revisions anticipated in 11/16 filing.
Curtailment Procedures for Interim NITS/NFCD Transmission Service (PP 542-555)	PJM's submittal must also detail the curtailment priorities between Non-Firm PTPS, Interim NITS, and NFCD transmission service, including how or if PJM will prioritize transmission customers for curtailment based on duration of service. (P 555).	Included provisions for Interim NITS in 8/17 filing. Curtailment provisions to be revised for Interim NITS and the contract demand service to specify that service will be curtailed based on contribution to exceedance of system limit. To be included in 11/16 filing. Additional revisions anticipated in 11/16 filing.
Rates, Terms, and Conditions for Interim NITS (PP 556-578)	Revise Tariff to specify that an Eligible Customer taking Interim NITS will receive non-firm transmission service for the delivery of energy to	8/17, revised interim NITS section to reference Eligible Load and revised section 701.1 for automatic conversion to NITS upon

	Co-Located Load and convert automatically to a Network Customer when Network Upgrades are complete. (P 571).	completion of necessary upgrades when reflected in PJM systems.
Rates, Terms, and Conditions for Interim NITS (PP 556-578)	Revise Tariff to assess to Eligible Customers taking transmission service on behalf of Eligible Loads: (1) administrative service charges, (2) ancillary service charges, (3) black start service charges, (4) regulation charges, and (5) any redispatch costs. (P 573).	8/17, proposed language for interim NITS and revised to reference Eligible Load instead of co-located load. 11/16 to be expanded to include large load.
Rates, Terms, and Conditions for Interim NITS (PP 556-578)	Revise Tariff to incorporate the rates, terms, and conditions for Interim NITS that includes clarifications to specify that (1) an Eligible Customer taking Interim NITS on behalf of Co-Located Load may be served by a Co-Located Generator that is seeking capacity resource status during a curtailment condition to the extent that Co-Located Generator has yet to obtain interconnection service or has only provisional interconnection service, and (2) an Eligible Customer on behalf of Co-Located Load cannot expect to be served by a Co-Located Generator that is a capacity resource during a curtailment condition. (P 576).	8/17, added to Part XI, section 705.2
Annual Report on New Transmission Services (PP 579 - 580)	PJM to submit proposed Tariff provisions requiring a report and a proposal for the information regarding new transmission services to be included in that annual report. (P 579). FERC suggests the following information requirements could be included in an annual reporting requirement: • Data regarding each transmission service request seeking each of the new services by transmission zone, including: o Peak gross load of the Eligible Load o Category of the Eligible Load o Type and MW of transmission service being requested o Type and MW of transmission service granted o Dates of reservation and usage (for non-firm services)	To be drafted; may be harmonized with transparency opportunities being pursued in the section 205 filing as further described in PJM's Response Matrix to the Large Load Show Cause Order Opportunities

	• Total MW of each type of transmission service taken each year by transmission zone (e.g., the total amount of FCD, NFCD, and Interim NITS transmission service taken relative to peak gross load at the meter receiving FCD transmission service) • Information about transmission revenues paid by Eligible Customers on behalf of Eligible Loads for each transmission service by transmission zone, including: o Total revenues paid by Eligible Customers taking each service per transmission zone o Percentage of each transmission owner's total revenue requirement paid via revenues from each new service o MWs of each new transmission service taken by Eligible Customers serving Eligible Loads as a percentage of peak gross load for each transmission owner • Frequency and magnitude of curtailment from the reservation of NFCD transmission service and Interim NITS by transmission zone • Frequency and magnitude of denials of NFCD transmission service reservation requests by transmission zone. (P 580).	

*Note: A 9.2(b) consultation is not required for compliance filings proposing Tariff revisions. PJM offers this matrix under the unique circumstances presented given the interrelatedness of the Section 205 filings PJM is making regarding large loads and the ongoing compliance requirements in the June 18, 2026 co-located load order.