



# Manual 19: Attachment B Redlines Update

Planning Committee

May 8, 2026

## **Review of Redline Updates to Manual 19 Attachment B CIFP Proposals**

Manual 19 Feedback Received From February Page-Turn

Timeline of Load Forecast Including CIFP Initiatives

Transparency of Customer Data

Relevant Electric Retail Regulatory Authority (RERRA) Review

Duplicative Requests

Third-Party Review

Other Issue Identification and Issue Verification

# Manual 19 Feedback Received From Critical Issue Fast Path Page-Turn

## Transparency (NDA)

Explicitly identify key customer data

Permit additional information requests by PJM

Apply heavy discount for insufficient data submissions

Concerns about willingness or legality of customer participation

Add language that submissions will be in accordance with state laws

Differentiate data requests for existing and planned large loads

## RERRA Review

Consider demonstration of review through an existing regulatory process (e.g., IRP)

Eliminate the requirement to provide the date

Create a formal "opt-out" mechanism for RERRA

Establish a clear timeframe to limit amount of time for RERRA feedback

## Duplicative Requests

Concerns about customers willingness to disclose information

Clarify the responsibility of the EDC/LSE in the duplicative inquiry

Require EDC/LSE to collect the zone(s) in which duplicative projects are in development

Clarify how duplicative projects will be discounted

Apply a heavy discount if a customer elects not to participate

Provide a mechanism for customer non-response

## Third-Party Review

Clarify entities involved in Review and confidentiality protections

Explicitly state role of third-party as supplemental analysis

Mirror the scope of work to that of PJM's load adjustment request

Present third-party findings on same day as September LAS meeting

Provide detail on the Scope of Work of the Consultant

Clarify how PJM will evaluate variations between forecasts



# Manual 19 Attachment B Final Amendments

**Jan. 2026**

*2026 Load Forecast Published*

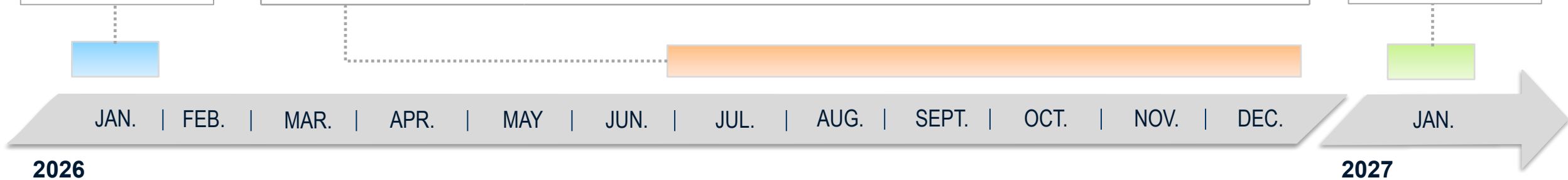
**July-Dec. 2026**

**Schedule for 2027 Load Forecast Adjustment Process**

- July – *Solicitation of Load Forecast Adjustment with Template*
- September – *EDC/LSE Load Forecast Adjustments Provided to PJM*
- September/October – *Stakeholder Presentations to Load Analysis Subcommittee*
- November/December – *PJM Final Load Forecast Adjustments and Presentation at Load Analysis Subcommittee*

**Jan. 2027**

*2027 Load Forecast Published*



# Manual 19 Attachment B

## Issue Identification

## New Redline Edits

- Inclusion of NDA **equivalent agreement**
- Clarified all **relevant** information for **existing and planned** large loads
- Specified **information in template** for large load adjustment requests
- Data submitted on **customer-level** or aggregated on a **campus-level**

## Customer-Level Data Requests

- Facility Owner
- Location
- Status of Site Control and Permitting
- Load Type
- Project Demand Characteristics
- Project Configuration
- Project Stage
- Financial Responsibilities
- Links to TEAC or SRRTEP supplemental projects

## Clarified Purpose of NDA Proposal

Facilitate load adjustment verification, validation, and adjustment estimation

## New Redline Edits

- Provide a method for **additional follow-up** for customer-level data outside the template specifics, to the extent possible
- Clarified failure to provide customer-level data may result in **rejection or discount** of adjustments
  - However, sharing of information should **not conflict with state law**

## Clarified Confidentiality of NDA Data

- Non-member data shared for load adjustment request process will be treated under same confidentiality as PJM Member data
  - Limits disclosure of site- or customer-level data
  - Requires aggregation or anonymization for external release

## Further Explained Roles in RERRA Review

- Mandatory for EDC/LSE to provide RERRA an opportunity to give feedback
- Opportunity for RERRA to waive participation in the event they have no feedback or an overlapping regulatory process exists that satisfies their review

## Added Context Around Final Submission and Use in Adjustment Process

- Conduct review and provide feedback in PJM-provided template before load forecast adjustment is submitted in September/October
- If EDC/LSE does not indicate that RERRA waived the opportunity or disclose feedback, may result in rejection or discounting

## Added Disclosure of Feedback and RERRA Participation at LAS

- PJM will disclose whether a RERRA review was conducted at LAS presentations of adjustments (September/October)
- Specific feedback will not be disclosed by PJM, but the RERRA will have the opportunity to offer feedback at LAS

EDC/LSE load adjustments and RERRA feedback do not need to match,  
though both perspectives must be submitted to PJM

## **Removal of “further justification and explanation language” in clause for submitting data on duplicative large load requests to PJM**

If the submitter indicates that a load interconnection request may be duplicative but does not provide the number of sites and amount of MWs, or further justification and explanation, then such duplicative request will be removed from the forecast.

## **Clarified and described how duplicative loads will be discounted**

- Proportional to number of sites (or MW) and locations
- May be disproportional if significant project milestones have been met in one location but not in another

## Issue Identification

Date for notice of intent for large load adjustment request

- August 1 – To ensure adequate time to set up secure document sharing

Clarified definitions for ESO, CC, and Other

Expanded on considerations for inclusion in RPM Auction via Firm and Non-Firm definitions



# Manual 19 Attachment B

## Issue Verification

## Clarified Purpose of Third-Party Review in Final Load Forecast

Tool to help PJM verify and validate adjustment requests and illustrate uncertainty through multiple forecast scenarios

### Specified the Expected General Methodology of Consultant Forecast

- Study national and intra PJM trends alongside EDC/LSE data
- EDC/LSEs are expected to be available for confidential communication with independent third-party

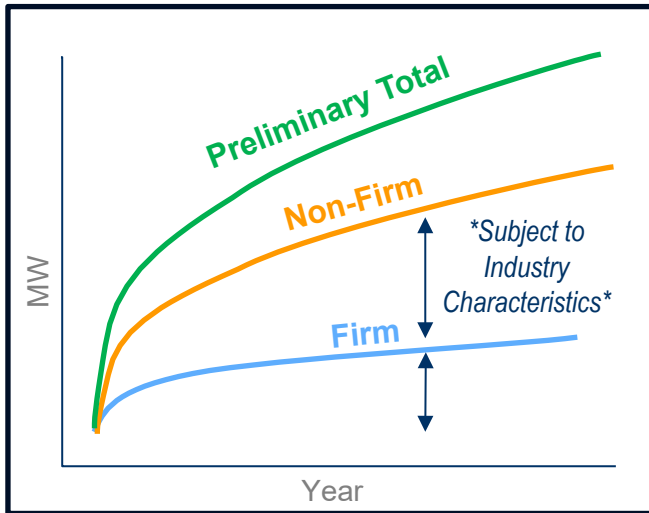
### Expanded on Expectations for the Presentations to LAS

- Independent Third-Party will present methodology, assumptions, and independent forecast
- Stakeholders will have the opportunity to provide feedback before forecast finalization

## Issue Verification

Add explanation of how PJM Load Analysis work and CIFP initiatives will culminate in one final annual load forecast

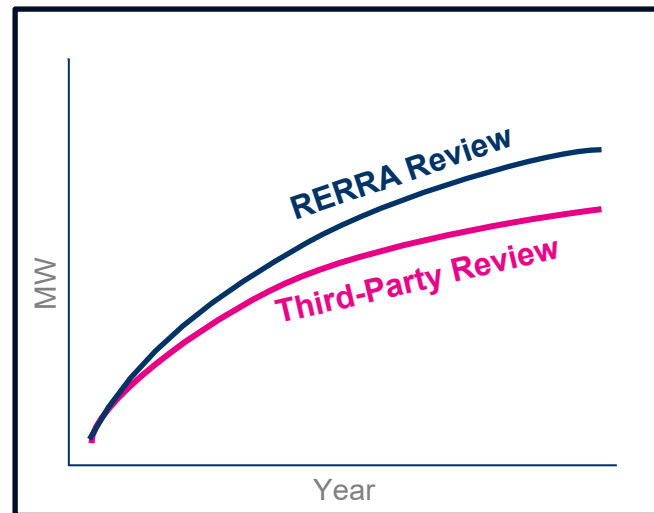
*EDC/LSE Submissions to PJM*



**Firm + Non-Firm = Preliminary Total**

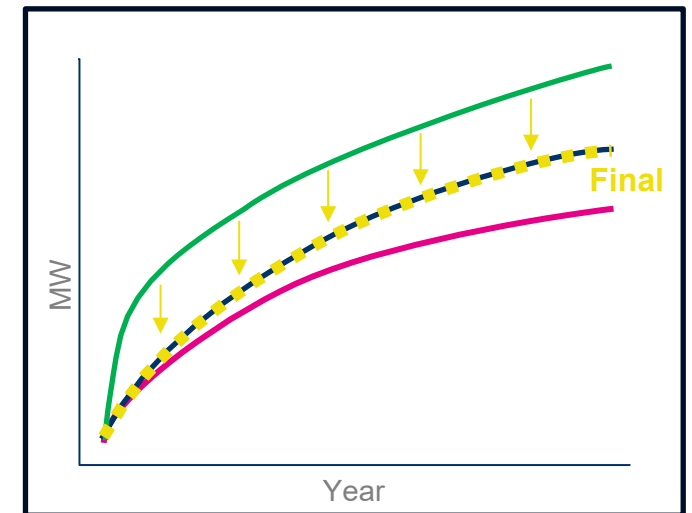
*\*If consistent with RERRA and Third-Party review, preliminary total becomes final\**

*Stakeholder Review of Forecast*



**Compare to Sum Incorporating Feedback and Analyses**

*Vetting of Discrepancies*



**Final Total Discounts Non-Firm to Meet the Greater of the RERRA Feedback and Third-Party Analysis**

## Issue Verification

Removal of inclusion of “assessment of commercial probability” language when evaluating the categorization of Firm and Non-Firm

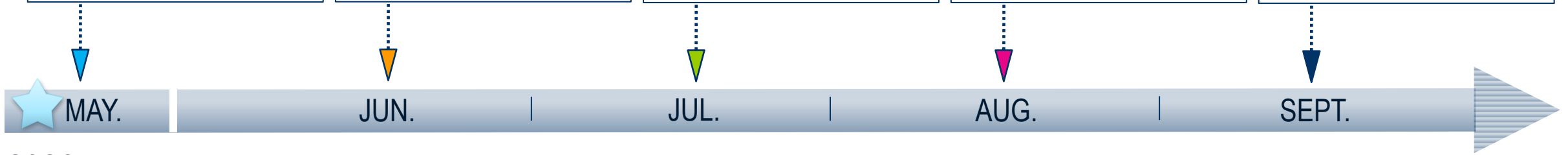
Added engagement with EDC/LSEs for collaboration on industry characteristics, as well as recognition for regional differences in such

- Assumptions for characteristics to be discussed at LAS

Added description of annual accuracy report of previously included large load adjustment quantities relative to known actuals

- Published each Spring
- Presented at LAS

MAY 8	JUNE	JULY	AUGUST 1	SEPTEMBER 29
<p><b>Planning Committee</b></p> <p>Review Manual 19 Attachment B redline amendments with stakeholders</p>	<p><b>Manual 19 Updates Posted</b></p> <p><b>Load Analysis Subcommittee (June 5)</b></p> <ul style="list-style-type: none"> <li>• Template for LLA Requests</li> <li>• Accuracy Report</li> </ul>	<p><b>Template for LLA Requests Distributed to EDCs and LSEs</b></p>	<p><b>Notice of Intent Due for EDC and LSE LLA Request Submissions</b></p>	<p><b>Load Analysis Subcommittee</b></p> <ul style="list-style-type: none"> <li>• Stakeholder Presentations</li> </ul>



2026

Andrew Gledhill, Sr Manager

**Resource Adequacy Planning**

[andrew.gledhill@pjm.com](mailto:andrew.gledhill@pjm.com)

[Load\\_Analysis\\_Team@pjm.com](mailto:Load_Analysis_Team@pjm.com)



**Member Hotline**

(610) 666-8980

(866) 400-8980

[custsvc@pjm.com](mailto:custsvc@pjm.com)

# Appendix

## *Issue Identification*

### RERRA Review

- The submission must indicate the date that the submitter provided the load forecast adjustment to the Relevant Electric Retail Regulatory Authority (RERRA), providing an opportunity for RERRA review/feedback before load forecast adjustment is submitted to PJM. The submission must indicate whether a meeting occurred and what feedback, if any, was offered by the RERRA.

## *Issue Identification*

### Firm vs. Non-Firm

- To be considered for inclusion in forecast period covered by an RPM Auction, the submission or portion of the submission must be considered Firm. Firm will mean having an ESO or CC plus a meaningful/verifiable financial commitment (such as credit/collateral support, financially significant infrastructure investment, or long-term supply commitment with new or existing resources). All submissions or portions of submissions not meeting this definition will be considered Non-Firm. Non-Firm may be considered for forecast periods not covered by an RPM Auction.

## *Issue Identification*

### Duplicative Requests

- Submitters shall inquire with their subject customers, and indicate to PJM based on their best knowledge, whether any load interconnection requests that are received (that do not have either an ESO or CC) are duplicative with other such requests made to interconnect large load either within or outside of the PJM region such that only a subset of such requests are expected to achieve commercial operation. If submitters are aware of duplicative load interconnection requests, the submitters are required to provide the number of sites and amount of MW that are duplicative and included in their submission. If the submitter indicates that a load interconnection request may be duplicative but does not provide the number of sites and amount of MWs, or further justification and explanation, then such duplicative request will be removed from the forecast.

## *Issue Identification*

### Transparency (Non-Disclosure Agreements)

- Submitters must ensure customer NDAs include ability to share all information with PJM related to large loads and such information must be shared with PJM.

## *Issue Verification*

### Independent Third-Party Review

- PJM may obtain additional review and an independent forecast through an independent third party. This review would weigh EDC/LSE information as well as national and intra PJM trends that would help inform PJM's final determination. The assumptions and independent forecast resulting from this review would be presented to stakeholders at LAS meetings for opportunity for feedback prior to finalizing for PJM consideration.