LAS Stakeholder Feedback Poll
Question 1
Based on the information provided at the June 5 LAS meeting, what feedback would you like to provide to PJM?
We support the transparency effort (recurring report, zone dashboards, posted data are real improvements), then push for more diagnostic detail on the methodology.
We appreciate the discussion at the June 5 LAS meeting on the new state review step in PJM's review of Large Load Adjustment (LLA) requests. While we see potential value in this step to support PJM's forecasting, there are important questions regarding state capacity, timelines, process, and information needed for states to provide meaningful review. We agree with the statement from PJM staff that this step may need to evolve in response to initial experiences. Given that this summer is the first opportunity for states to provide review of LLA requests as part of a formal step in PJM's forecasting process, it would be helpful for PJM to give thought to how it will evaluate the utility of this new step and need for potential changes following the first cycle, in concert with state partners, utilities, and other LAS members. For example, after this summer, it would be useful for LAS participants to understand information such as how many states provided feedback, what form this feedback took, what topic areas were addressed in the feedback provided, and whether and how PJM and CRA used this feedback to adjust the final load forecast. It would also be helpful for PJM to survey states to understand, both for states that did and did not provide feedback, what their experiences were and what changes they might need to make this process more effective. These suggestions that related to understanding and potentially evolving this new process are ones that it would be helpful to have PJM provide updates on a future LAS meeting.
We have continuing concerns regarding the robustness of PJM's load forecasting practices. We have documented these concerns in writing over the last several months. See, our comments, dated March 11, 2026 (providing general comments), and our comments, dated June 3, 2026 (commenting on the PJM load forecasting accuracy report). A central concern is the fragmented, bespoke nature of PJM's incorporation and vetting of the large load adjustment ("LLA") requests from individual transmission owners ("TOs"). The individual TOs use different and non-uniform methods for reporting and estimating the large loads that go into their LLA requests; and, PJM's method for vetting these requests is not transparent and does not seemingly establish uniform and robust minimum standards, across the reporting TOs, for the documentation and support of the requests. These fragmented practices are an important "gap" identified generally by NERC. See, NERC, Assessment of Gaps in Existing Practices, Requirements and Reliability Standards for Emerging Large Loads (Mar. 2026), pp. 9-10. Among the areas of weakly supported, non-uniform and inconsistent and non-transparent reporting, both by PJM and the reporting TOs, are: (i) the level and nature of financial commitment by the large load customers to support the LLA requests; (ii) distinctions among types of large load customers, that seemingly are fundamental to understanding and estimating the nature of their electric demand and consumption patterns (e.g., distinguishing between collocated, enterprise, hyperscaler facilities; customer electric supply arrangements (on-site front of the meter, or behind the meter generation, its existence and operating mode); load flexibility practices (NERC (May, 2026) p.13)); (iii) large load ramping and utilization rates (NERC (May 2026, p. 13); and (iv) site-specific mapping of the individual customer requests subsumed in the aggregate LLA requests made by individual TOs; (v) level of maturity of the individual large load customers' project developments (and "buildout schedules", See NERC (May 2026, p. 12)); (vi) the methods for identifying duplicative customer service requests; and (vii) the timing and feasibility of completion of the necessary interconnection facilities and integration of the large load by the reporting TO. While much of the information is sourced from by the large load to the TO, large load customers "should provide accurate siting and expansion timelines to inform demand forecasts and expected reliability requirements. They should identify location, monthly or yearly buildout schedule, and reliability expectations (e.g., firm vs. interruptible interconnection) and share anticipated transmission service type." NERC (May, 2026), p. 14. As the entity responsible for the regional load forecast, PJM should ensure the provision of this information and the TOs, consistent with NERC guidance, should enable PJM's ability to secure this information.

We are mindful that large load/data center electric forecasting is fast evolving and challenging; but also that extensive industry efforts have been undertaken in recent periods to update and improve forecasting practices to address these challenges. See, e.g., NERC, Risk Mitigation for Emerging Large Loads, Large Loads Working Group Reliability Guideline (May 2026); ESIG Large Loads Task Force, Forecasting for Large Loads, Current Practices and Recommendations (December 2025). We urge PJM to make further improvements in its forecasting practices in light of these industry-wide efforts.
PJM staff have done a great job of stakeholder engagement while developing these new changes in the LLA process.