

To	PJM Load Analysis Team. Andrew Gledhill, Molly Mooney
From	Maryland Office of People’s Counsel (MPC) Philip Sussler
Re	Questions for PJM Subject Matter Experts regarding the “PJM Load Forecast Accuracy Report” (May 29, 2026).
Date	June 3, 2026

MPC appreciates the issuance by PJM of the Load Forecast Accuracy Report (the Report), which is anticipated to be issued annually. The Report represents an advance from prior practices, increases transparency regarding PJM’s forecasting and begins to afford PJM, PJM stakeholders and the public better ability to assess PJM’s forecasting accuracy. Establishing a robust assessment of historical experience when compared to prior forecasts for the same period and leveraging the resulting insights to improve forecasting practices is a fundamental and necessary task to improving PJM’s load forecasting practices.

MPC has further questions regarding the Report, identified below in section I.

In addition, MPC submits that there is a continuing need for further improvements to the Report, informed by the well-recognized challenges arising from the increase in forecasted large load data center demand growth and the huge stakes arising from infirmities in PJM’s load forecasting practices. Some of these needed improvements are noted in section II below. MPC previously provided, by correspondence dated March 11, 2026, comments to PJM regarding issues that its forecasting accuracy review should address, which remain unaddressed by the Report. MPC’s prior comments are attached at the end of this memo.

MPC requests and consents to PJM’s public posting of these comments and any response thereto by PJM.

Section I.

1. What is the weather normalization of the reported historical and forecasted large load adjustments (LLAs), if any? Are the historical large loads for 2025 weather normalized on the same basis as the forecasted large load adjustments for the same period?
2. What is the metering PJM utilizes to report the historical maximum demand for large loads from the individual LDAs? Is the metering method uniform across the reporting Transmission Owners (TOs)/Load Serving Entities (LSEs)? If not, what are the differences? Does the metering report loads on an hourly basis and, if so,

can this information be provided? Are the reported loads by LDA coincident with the RTO peak load? If not, what is the load coincident with the RTO footprint-wide load resulting from the large loads? Do the metered loads map to individual large loads that were included in the large load adjustment requests of the TOs which were included in the 2026 PJM Load Report? Can PJM report the annual energy consumption associated with the large loads and their load factor(s)? How many individual large loads are included in each TO/LSE's report to PJM utilized to prepare the accuracy report?

3. The Report provides (a) annual maximum demand historical data for 2025 in the excel spreadsheet accompanying the posted report and (b) graphical treatment of monthly maximum demand loads to August, 2025. What is the basis for the monthly loads? Can this information be provided in excel format? Can the full monthly results for 2025 for the full year be provided?
4. The Report withholds disclosure of the historical information for the BGE LDA. Mindful of the cited reason for the non-disclosure (a single customer and presumed unspecified confidentiality reasons), the information disclosed for the other LDAs is anonymized and reported in terms of total load. Query why isn't that treatment sufficient to allow reporting of the BGE LDA loads? If not permissible due to asserted confidentiality requirements, what are the specific confidentiality arrangements that prevent reporting of this load? Confidentiality bars to reporting of historical loads presents a real impediment to PJM load forecasting development and refinement.
5. How do the reported large loads compare with the documented committed capacity and utilization of the capacity committed to by each large load?

Section II.

MPC reiterates its prior comments, dated March 11, 2026, regarding PJM's load forecast preparation guidance. We attach the portion of MPC's prior comments relating to the annual forecasting accuracy review.

PJM should develop reporting criteria to allow assessment of and leveraging the results of experience to better determine PJM's methods for analyzing future LLA requests. If this work was done as part of the 2026 Load Forecast development cycle, this information would be a useful addition to the current report.

These criteria include the following:

- Historical experience (or realization) regarding “capacity” vs. “demand” requests for the LLAs.
- Historical experience regarding “utilization” rates by LLAs (capacity vs. demand). How are capacity and demand distinguished?
- Historical experience regarding ramping rates by LLAs.
- What is the capacity of back-up generation available to cover the reported LLAs’ load?
- On a prospective basis (for future annual accuracy reports), what are the LLAs anticipated to opt for the connect and manage regime, currently under development by PJM, but anticipated for implementation during the current forecasting cycle?
- On a prospective basis, what is the quantity of "Bring Your Own Generation" associated with the LLA loads (also anticipated for adoption in the very near term and likely affecting the current forecasting cycle)?
- What is the level of financial and contractual commitment of the LLAs?

Attachment (excerpt from MPC's comments, dated March 11, 2026) (footnotes omitted).

4. Incorporation of historical experience with data center loads.

Due to the large scale and novelty (with little historical data prior to 2024 the first-year forecasted data center load growth had a big impact on the annual PLM load forecast), PJM has addressed data center loads exclusively through the LLA process based on individual TO reporting of data center customer service requests, in a manner separate from that afforded to other broadly defined customer groupings. Forecasts for these other customer groups, rolled up into the RTO-level and zonal forecasts, are primarily based on an econometric analysis led by PJM of prior consumption patterns in relation to correlated economic variables and weather variations.

While it still may be early in the data center growth phase, experience is accruing with data center loads and that experience should be rigorously reviewed and analyzed and that analysis should inform in a timely manner PJM's annual load forecasting cycle practice. This review should also include analysis of experienced data center project capacity utilization and ramping rates, data center differentiation (among collocated data centers, hyperscalers and other broad data center customer types) and project triage/cancellations (and the circumstances of the cancellations and their comparison to prior projections).

transformations, among other matters. In turn, the TOs and LSEs should be required to provide this information to the extent available to them on a systematic basis to PJM. Currently, PJM's LLA protocol lacks a mechanism for doing this in a systematic and rigorous manner for data center loads. PJM's announcement that it will do an annual formal true-up each May of prior periods of data center load growth is a salutary development but needs formal recognition in PJM's LLA process and a full description and analysis of data center load and development experience, including, as noted above, project triage, project ramping, project utilization and project delay for the prior period under review.

Such a review, incorporated into the forecast, should also include an analysis of probabilities of recession, financial and credit risks, impact of other economy wide variables on data center growth, feasible pacing of large load grid interconnections, supply chain limitations and other matters. Lessons learned from this process should be integrated on a systematic basis into PJM's pending load forecasting for next year's annual forecast and all future annual forecast cycles.