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To	Andrew Gledhill, Molly Mooney, PJM Load Analysis Subcommittee ("LAS")
From	Maryland Office of People's Counsel ("OPC"), Philip Sussler
Re	PJM Transmission Owners ("TOs")– initial, proposed large load adjustment ("LLA") requests – 2027 load forecast cycle – preliminary questions.
Date	Sep. 28, 2026

OPC poses the following questions to the PJM load forecasting subject matter experts, and through them, where necessary, to the individual TOs, with respect to the initial proposed LLA requests of the TOs, posted to the PJM web-site on Sep. 24, 2026. OPC requests that these questions and responses be publicly posted to the PJM LAS page of the PJM web-site.

1. Please confirm/correct the draft, preliminary compilation of the TOs' LLA requests, individually and aggregated, set forth in the attached excel format spread-sheet.

Use of this information in a timely and consolidated manner is vitally important to assist external parties in their review of the status and progress of the PJM load forecasting cycle. We understand that this information, as presented by the TOs, is proposed and not final and is subject to further PJM review and possible adjustment; but a consolidated review of this information now remains very informative and necessary for OPC, and perhaps other external reviewers, to participate effectively in further review of the information.

2. The individual TOs' LLA requests, as posted, are bespoke in multiple dimensions and require clarification for quantification.

For purposes of a consolidated quantitative review of all of the filings, OPC requests: (i) clarification of the PENELEC use of the term "pipeline" to describe its LLA request. Are these "capacity" and/or "demand" forecasts as used by the other TOs? If not, what is their status in the TO's LLA and the PJM forecast?; (ii) Duke Ohio/Kentucky categorizes its LLA request as "firm" and "non-firm". Are these "capacity" and/or "demand" as used by the other TOs? If not, what is their status in the PJM forecast?; (iii) AEP reports values for its different operating areas separately. Are all of these values included in the single AEP zone?; (iv) some of the TOs do not report yearly values for the full forecast period to 2047, but rather an "ultimate" estimate, consolidating multiple years? Where this occurs, please report the yearly estimates for each year of the 20 year forecast period.

3. The serious lack of uniformity and, in many cases, incomplete information contained in the individual TOs' LLA requests filings, both individually and cumulatively, make them unnecessarily difficult to review, understand and analyze for external parties and the public generally.

OPC asks that the following questions be posed to the individual TOs with respect to their LLA requests and answered to enhance transparency, uniformity and review and analysis by external parties and the general public. Some of the TOs have answered some of these questions in their individual filings, but where answered, not in a uniform manner. Pending receipt of answers to these questions, OPC asks that PJM prepare a consolidated report compiling the TOs' responses in a single document. *See, generally, PA PUC, Electricity Load Forecast Accountability Annual Report* (June 2026), Appendix C, p. 40 (providing a suggested list of relevant questions, incorporated and added to below, for large load interconnection requests underpinning electric load forecasts).

- 3.1. Is the customer, covered by the LLA request, considering other locations for the activity covered in the service request outside of the TO's service territory?
- 3.2. What is the threshold (in megawatts of load, and how and when measured) that the TO uses to determine whether a customer request qualifies as a large load for purposes of its large load request?
- 3.3. Does the customer own or control the land? If so, what is the nature of the commitment (option, full purchase, lease, etc.)?
- 3.4. Does the customer have all necessary building permits?
- 3.5. Does the customer have preliminary or final subdivision plan approval?
- 3.6. Does the customer have tenants and/or compute and supporting infrastructure materials (e.g., CPUs, GPUs, cooling and communications equipment) procured for the proposed site? If so, what is the percentage of ultimately planned tenancy and infrastructure, covered by the service request, that have been procured?
- 3.7. Has the customer publicly announced its project? If so, when, where and what was the size of the project described in the public announcement?
- 3.8. Has the customer signed an interconnection, construction, or line extension agreement with the TOs? What are the financial commitments the customer has made under this/these agreement(s) if they exist (their nature and the total monetary value)? What percentage of the cost of the TO's facility upgrades (and baseline expansions) required to serve the customer is covered by the customer's financial commitment?
- 3.9. Has/Have the customer(s) signed an Electric Service Agreement ("ESA") with the TO? If so, what is the term of the ESA? What are the exit fees, if any? What percentage of the cost of the infrastructure expansion/upgrades required to serve the customer is

committed to by the customer under the ESA signed by the customer? How does the TO define, estimate and allocate the cost of the infrastructure expansion upgrade required to serve the customer?

3.10. Is the customer(s) request(s) covered by the LLA request subject to (or will be subject to) the terms of an applicable retail large load tariff? If so, has the TO and/or customer(s) complied with the terms of the retail large load tariff?

3.11. Is a Detailed Load Study complete?

3.12. Is a Circuit Load Study Complete?

3.13. Does the customer have its own generation through self-supply or procurement from a third party? What is the capacity and operational profile of that generation? When is the generation anticipated to be in commercial operation? Will the commercial operation date of the generation be aligned with the customer request for first service and its ramping profile?

3.14. What is the customer's status – colo, hyperscaler, other? How is the customer's project financed – hyperscaler, vendor-financed, other? What are the credit rating(s) of the customer or its tenant(s), if any?

3.15. Does the customer contemplate procuring non-firm transmission service from the TO (and through it, PJM) for all or a part of the load anticipated to occur at the project site? If so, how much and over what time period? Does the large load request include (or not) the level of non-firm transmission service that the customer(s) anticipate(s)?

3.16. Has the TO reviewed the LLA request with its state regulator(s)? If so, what was the nature of that review? Provide the information submitted to the state regulator, any written feed-back by the state regulator and any adjustments made by the TO in response to the state regulator's review.

3.17. Is the customer's project and related service request the subject of a supplemental transmission project disclosure (for need and/or solutions) under Attachment M-3? If so, what is the project designation number and when was it reviewed by the PJM TEAC or sub-regional committees during a PJM stakeholder meeting?

