

Stakeholder Feedback on Connect and Manage Senior Task Force Survey Responses

Question 1	
Company Name	Based on the presentations and concepts discussed at the March 31, 2026 CAMSTF meeting, do you have any feedback for PJM and/or is there any additional education that would be helpful and why?
1. Campbell Energy Advisors, LLC	Education on curtailment triggers would be helpful along with discussion regarding any ability to make such triggers transparent to market participants in real time.
1. New Jersey Board of Public Utilities	<p>PJM's Eleven-Year Reserve Requirement Study from its 2025 ELCC/RRS projects that PJM's IRM will rise from 19.1% to 32.7% between the 2026/2027 and 2035/2036 Delivery Years, and that the pool-wide AUCAP factor will fall from 77.0% to 66.8% over the same period. Locking in a fixed UCAP at initial eligibility for capacity resources that bilaterally contract with New Large Loads (NLL) will significantly over-accredit those resources relative to capacity that is not bilaterally contracted, and will leave the Bring Your Own New Generation (BYONG) commitment undersized relative to the load obligation under future FPR forecasts. Because PJM's proposed buffer in the BYONG commitment is fixed at initial eligibility, Staff requests that its calibration account for both the IRM and AUCAP trajectories in Table 4 of the 2025 RRS (or other updated forecasts). Given the magnitude of the projected changes in IRM and AUCAP through the 2035/2036 Delivery Year, a buffer that is not explicitly calibrated to these trajectories risks creating a significant reliability gap over the contract term. Staff requests that PJM address how its proposed framework prevents such a gap from translating into a reliability shortfall borne by non-BYONG ratepayers, and whether the buffer is the sole mechanism to address changes in accreditation and FPR over the contract term. Staff separately requests educational materials on the operational and modeling viability of integrating bilaterally contracted capacity resources with fixed UCAP into PJM's Loss of Load Probability Model used to determine ELCC class ratings and the IRM. Specifically, Staff requests clarification on whether fixed-UCAP BYONG resources would be modeled at their locked-in values or at their then-current class ELCC ratings, and how any inconsistency would be reconciled within the model.</p> <p>Additionally, Staff requests that NLLs taking service under Connect and Manage be curtailed before pre-emergency load management reductions. As these loads are interconnected on a conditional basis, they should bear curtailment risk before PJM calls on system-wide Demand Response, which would otherwise shift the reliability impacts of new load onto existing customers.</p> <p>Lastly, Staff firmly believes that the Connect and Manage load should be excluded from the demand stack. Including these NLLs in the reliability requirement is internally inconsistent: PJM has determined that these loads are curtailable and not entitled to firm service, yet including them in the demand stack signals that capacity will be procured on their behalf as if they were firm. This approach risks shifting the costs of new generation onto existing ratepayers and weakens incentives for NLLs to procure their own supply.</p> <p>PJM provided an education session on this issue during the April 10 stakeholder meeting. That presentation provided two examples, neither of which contemplated a situation where removing the Connect and Manage load would take the RPM out of shortage conditions. Absent removal of the Connect and Manage load, the costs associated with this situation are enormous, and existing ratepayers should not be exposed to those costs – this very same exposure is causing rate shock across the system today and partly forcing the need for the price collar</p>

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1. Dynegy Marketing and Trade, LLC	<p>Vistra appreciates PJM's concerns regarding the impending capacity shortfalls in the region, and Vistra is ready to work with PJM to address these challenges. We further agree that accessing load flexibility will be critical to reliably and affordably interconnecting the new large loads that will bring substantial economic development to the PJM region and help the United States win the AI race.</p> <p>But, we continue to be concerned by the piecemeal approach to these challenges through a set of temporary reforms, including Expedited Interconnection Track, Connect and Manage, and the Reliability Backstop Auction (RBA). These designs seem overly complicated, potentially duplicative, unworkable, and raise significant legal and policy concerns. And, stakeholders are spending a tremendous amount of time and resources for the development of a complicated set of temporary reforms. We think the better approach is likely to develop and implement a narrow RBA, like the Joint Stakeholder proposal submitted in the stakeholder process, and immediately transition to a long-term solution, rather than rely on Connect and Manage as an interim step.</p> <p>With respect to Connect and Manage, Vistra continues to have significant questions regarding the workability of the proposed design. For instance, we are concerned that the need to be addressed by the RBA will not reflect the potential new generation that is developed as a result of a Connect and Manage design. More fundamentally, Vistra is not aware of any mechanism that would enable PJM to have authority to even indirectly dictate curtailment of specific end-use large loads, or how such curtailment could work in practice. Moreover, to the extent the design only incentivizes contracts between new load and new generation, this design discriminates against existing generation. We believe PJM can develop designs that utilize load flexibility as a means to address near-term resource adequacy challenges, while providing a non-discriminatory means to incent large load interconnections that contract with both new and existing generation.</p>

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1. Mainspring Energy, Inc.	<p>Mainspring generally supports the concepts PJM and Exelon presented at the March 31, 2026 CAMSTF meeting. We support acting quickly to create a Connect and Manage (CAM) framework.</p> <p>Specifically, we strongly encourage PJM to host additional educational sessions around the topics presented in the Exelon PS/IC. Mainspring generally supports the RTO-level CAM trigger concept presented in Slide 7 of the PJM 3/31 presentation.</p> <p>However, PJM's proposed trigger leaves substantial value left on the table. An RTO-only trigger relies on capacity and only RTO-level capacity. This does not address local capacity and transmission-related limitations to connecting new loads.</p> <p>The RTO-only trigger risks continuing reliability issues in the PJM region and limiting the options available to large loads to get online faster in return for flexibility.</p> <p>Supply/demand imbalances (and constraints) are anticipated particularly in specific LDAs, not randomly spread across the RTO. Therefore, a constrained LDA is likely to face load shedding. Therefore, the connect and manage framework must address these local capacity constraints.</p> <p>Instead, Mainspring recommends adding triggers related to local LDA capacity (not just RTO capacity) and transmission.</p> <p>One mechanism that could help achieve the goals here is to allow large loads to enroll in Interim NITS regardless of whether they are associated with Co-Located generation. Interim NITS is a curtailable transmission service and addresses transmission constraints. While we're still early at evaluating this, it looks as though that approach could effectively create a CAM-like service that is inclusive of transmission constraints.</p> <p>This topic should be in scope to the CAM Senior Task Force meetings and be explored with new educational materials and matrix proposals.</p> <p>As many others have said, PJM should seek to align the RBP and the CAM proposal timeline and options available to large loads as much as possible to provide stakeholders a clear roadmap of the options available for energization.</p>

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1. Camus	<p>Camus appreciates the education PJM provided at the March 31 meeting on the Connect and Manage framework, BYONG concepts, and curtailment priority. We offer two areas of feedback:</p> <p>First, the proposed C&M trigger (PJM Supply < RTO Reliability Requirement) should be expanded to address local constraints, not just RTO-wide capacity shortfalls. Many large loads face binding transmission constraints at their specific point of interconnection, even when there is sufficient capacity at the RTO level. Addressing resource adequacy constraints alone will not resolve the transmission limitations that also delay large load interconnection.</p> <p>Second, the CAMSTF would benefit from more education and discussion on the topics raised in Exelon's issue charge on Large Load Customer Flexibility. The current options matrix has 17 design components populated for PJM's issue charge; Exelon's currently has none. Given the August target for finalizing packages, we believe this track needs more dedicated focus and education.</p> <p>Education would be helpful to address the following questions and topics:</p> <ol style="list-style-type: none"> 1) What is the division of roles and responsibilities for PJM and TOs in identifying site-specific transmission constraints and curtailment requirements for non-firm large loads. 2) What transmission planning tools and study methodologies would be needed to evaluate large load customer flexibility options — including whether 8,760-hour analyses (as referenced in Exelon's problem statement) would be required, and whether such tools exist today. 3) How would Exelon's four proposed flexibility options (fully matched, partially matched, storage matched, and C&M) be studied, operationalized, and coordinated with PJM's C&M procedures? 4) How would curtailment allocation based on "transmission dfax" (as described in Exelon's problem statement) work in practice alongside the capacity-based allocation methodology PJM has proposed to address RA constraints? <p>With regards to the second question above, we note that the type of site-specific transmission analysis contemplated by Exelon's issue charge has already been demonstrated with a different PJM utility using real transmission data, production cost modeling, and contingency analysis (Camus, Princeton ZERO Lab, and encoord, December 2025). Findings from that study underscored the importance of site-specific analysis by the TO and demonstrated the feasibility of conducting such analysis with tools and data available today.</p>

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1. Calibrant Energy	<p>Calibrant Energy appreciates the initial proposals discussed by PJM at the March 31, 2026 C&M meeting. Overall, Calibrant is supportive of the following elements of PJM’s design and encourages PJM to continue to develop the following aspects of the proposal:</p> <ul style="list-style-type: none"> • Including DR as an eligible technology for BYONG, which we interpret to mean all DR products (emergency DR, pre-emergency DR and PRD), all host customers (DR provided by large load additions and DR provided by other loads), configuration (asset-backed DR and curtailment DR), and size (no limitations on the size of a DR portfolio or an underlying customer in a DR portfolio). • Allowing large loads to BYONG through a portfolio of capacity resources, as this will allow loads and supply resources to commercially decide what is the best arrangement and mix of resources to meet their UCAP requirements • Allowing large loads to partially BYONG, as this will allow resources to enter into BYONG arrangements even if they do not fully cover their UCAP requirements to fully exempt themselves from connect and manage which will bring additional supply to the market • Checking BYONG UCAP for the initial Delivery Year but then maintaining C&M exemption eligibility so long as the resource remains operational as this provides the appropriate level of certainty to load and suppliers to enter into bilateral agreements which will allow projects to be financed <p>Calibrant’s primary concern with PJM’s initial proposal is the limited information provided regarding Exelon’s Issue Charge narrows the scope solely to Interim NITS for customers that are not Co-Located Load. The Load Flexibility Issue Charge should include discussions related to other forms of Non-Firm Transmission service options for non-Co-Located Load, similar to Non-Firm CDS in the Co-Located Load proceeding. Consistent with comments made at the March Members Committee meeting, there are significant gaps with the Co-Located proceeding, as all transmission service options developed there are only applicable to Co-Located Load arrangements. In order to fully take advantage of load flexibility as contemplated in Exelon’s Issue Charge, the task force must consider different transmission service options, including interim NITS and permanent Non-Firm transmission service options for non-Co-Located customers.</p> <p>In addition to expanding the discussion related to the Load Flexibility Issue charge, Calibrant is concerned:</p> <ul style="list-style-type: none"> • Limiting the Connect and Manage trigger to system-level shortage may not capture local capacity constraints and transmission-related limitations to connecting new loads. PJM should add connect and manage triggers related to local LDA capacity and, consistent with the recommendation above, consider different transmission service options for non-Co-Located Load. • The final Connect and Manage design will not be approved prior to the Reliability Backstop Procurement leading to market uncertainty. PJM should seek to align the RBP and the C&M proposals as much as possible to provide stakeholder a clear roadmap of the options available to customers moving forward.
1. American Clean Power Association	<p>Interest identification (1): Expand the Connect and Manage framework to consider Connect and Manage for both load AND supply. Interest identification (2): Have Provisional Service and interconnection study assumptions mirror the connective management approach used by ERCOT.</p>

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<p>1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC</p>	<ul style="list-style-type: none"> • PJM has not fully responded to the legal and jurisdictional questions that were raised at both the March 31, 2026 CAMSTF meeting and the meetings that approved the PJM Issue Charge. Among those questions: <ul style="list-style-type: none"> o How does PJM intend to avoid intruding on state jurisdictional boundaries with respect to setting the rates, terms, and conditions for retail service? For example, many states require utilities to provide firm service to load, new and existing, without conditioning that service on whether the load has contracted for capacity. Changing the terms of that service is, according to the U.S. Supreme Court, “a job for the States alone”(FERC v. EPSA, 577 U.S. 260, 280 (2016)). PJM will need to address situations where states will, for economic, political, security or other reasons, want to connect large load with firm service regardless of whether that load has contracted with corresponding generation. For example, large load that serves critical infrastructure such as emergency services or hospitals cannot limit their ability to get necessary firm service based on rules established by PJM. That is why the terms and conditions of retail service are left to the states. PJM has yet to articulate how any solution developed in the CAMSTF will navigate this important jurisdictional boundary. And what happens if all states do not opt in? Will some states be leaning on others for resource adequacy? That is exactly the type of issue that FERC is charged with addressing under the Federal Power Act. o PJM’s March 31 CAMSTF presentation focused on the concept that discrimination is permissible when it is not “undue.” While Constellation agrees with this general legal assertion, PJM has not provided stakeholders with a rationale to explain how the Connect and Manage Issue Charge and Conceptual Framework will not constitute undue discrimination beyond the assertion that “we’ll know it when we see it.” FERC and the D.C. Circuit have, however, placed some guardrails on possible discrimination, holding that “the cost causation principle generally calls for giving the same treatment to new and continuing customers, based on a straightforward economic rationale” (emphasis added) (See, Basin Electric Power Cooperative 188 FERC ¶ 61,132, at PP94-99 (2024);BNP Paribas Energy Trading GP v. FERC, 743 F.3d 264, 268 (D.C. Cir. 2014)). Based on this precedent, requiring a different – and inferior – level of service for comparable loads based on their date of interconnection is undue discrimination. Yet PJM’s Connect and Manage Issue Charge and Conceptual Framework propose to do just that, limiting the availability of firm service for new large loads unless they bring their own generation, a requirement that heretofore has not been placed on similar large loads. o Furthermore, PJM has also not explained how its proposal satisfies the requirements of section 202(g) of the Federal Power Act, instructing that service in any shortage situation be without undue prejudice or disadvantage. Under PJM’s Conceptual Framework, large loads subject to the Connect and Manage regime would be among the first to be curtailed. Unlike other loads in the New Curtailment Bucket, these loads did not volunteer for a non-firm service. These new large loads are also indistinguishable from a reliability and grid service standpoint to existing large loads on the system that have not contracted for capacity but would be curtailed well before existing large loads based on vintage. o Similarly, PJM’s Connect and Manage Conceptual Framework discriminates against existing generation resources, denying them the opportunity to serve as a contracting partner for new large loads looking to avoid being subject to Connect and Manage. This distinction is not made based on the capacity value of the resource, but instead on the date it entered commercial service. If existing resources are

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	<p>precluded from pursuing long-term contracts, they will lack the long-term incentive to remain in operation, and many will retire prematurely – consistent with the recent trend seen in PJM and exacerbating PJM's resource adequacy issues. And this is not just a problem for those existing generators; by arbitrarily eliminating a whole class of potential partners for new large load, PJM creates a potential market power concern as those new large loads will have fewer, and less competitive, opportunities to engage in bilateral contracts that will exempt them from Connect and Manage.</p> <p>o In its presentation at the March 31 CAMSTF, PJM stated that new large loads that come online after June 1, 2027 (the 2027/28 Delivery Year) would potentially be subject to Connect and Manage. This date raises settled expectations concerns; the 2027/28 Base Residual Auction has already been run and new large loads that were included in that auction participated with the expectation that they would receive firm service without conditions, as all previous large loads had. While those new large loads could theoretically still contract with new generation, any potential rules for Connect and Manage will not be finalized until late 2026 meaning that those loads would have less than six months to act (placing them at a significant contracting disadvantage) and any new generation those loads could contract with would not likely be available on June 1, 2027. At the very least, PJM owes the new large loads interconnecting in 2027, which had no prior knowledge that they might not have firm service an explanation as to how a June 1, 2027 date is workable. A better course would be for PJM to set an implementation date that gives all parties reasonable notice.</p> <ul style="list-style-type: none"> • Before proceeding further with the work of the CAMSTF, PJM should provide stakeholders with a legal memorandum that addresses each of these issues so that stakeholder and PJM staff time is not spent considering options that are not legally sustainable.

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1. Flatiron Energy	<p>Flatiron strongly supports the eligibility concept for BYONG UCAP that states that reductions in UCAP associated with annual updates to ELCC accreditation would not impact BYONG status. PJM's proposed approach of a one-time eligibility determination is essential to support the financing of new capacity, reduce supplier risk created by floating ELCC values, and enable timely development of cost-effective resources needed to maintain system reliability.</p> <p>1. Contracted Revenue Certainty Is Required to Finance New Energy Projects</p> <p>New generation resources relying on traditional project finance structures require a substantial portion of their revenue to be contracted and predictable in order to be financeable. From a lender's perspective, contracted cash flows must be sufficient and reliable enough to support debt service over the life of the loan. As a result, projects are unable to be built solely on the expectation of uncertain or re-determined future revenues.</p> <p>Merchant and other variable revenue streams are heavily discounted by banks and investors. When sizing debt and tax equity, this discounting can make it difficult to secure sufficient capital to move forward on projects. Capacity revenues that are subject to variable ELCC determinations outside a developer's control are haircut in this capital sizing process, constraining the amount of debt a project can support and increasing the cost of capital. This financing penalty can prevent otherwise cost-effective resources from moving forward. Well-designed BYONG contracts offer a clear opportunity to address this challenge. By enabling bilateral agreements with fixed and predictable capacity revenue, the BYONG construct can provide the revenue certainty needed to unlock financing for new storage and generation projects. Providing this certainty is essential to attracting capital, reducing financing costs, and enabling timely development of new capacity needed for system reliability.</p> <p>2. Variable ELCC Values Create Material Supplier Risk Outside Developer Control</p> <p>Storage UCAP in PJM is determined using ELCC, which is inherently system-dependent and outside of the supplier's control. ELCC values can change due to factors unrelated to an individual project's performance, including shifts in load shape, penetration of other resources, forecasting assumptions, or methodological updates. This creates an unpredictable revenue stream that is a primary challenge to financing and building new resources.</p> <p>Allowing UCAP eligibility to be re-evaluated during the contract term exposes suppliers to material downside risk that they cannot operationally mitigate. This risk is fundamentally different from performance risk or outage risk, which developers can manage through design and operations. Instead, it reflects a system-level recalibration applied retroactively to already-contracted resources.</p> <p>This risk creates conditions that make it significantly more difficult for projects to begin construction. Developers will struggle to raise sufficient capital to build projects when future revenue is subject to unilateral adjustment driven by system conditions they do not control. The result will be fewer projects reaching commercial operation, higher financing costs, or both.</p> <p>3. PJM's Proposal to Check UCAP Eligibility at the Start of a Contract Reduces System-Level Risk</p> <p>Flatiron supports PJM's proposal to combine modest early over-procurement with a single UCAP eligibility determination at entry into the BYONG process. This approach appropriately balances reliability objectives with the practical need for certainty in contracting and</p>

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	<p>development.</p> <p>By fixing UCAP eligibility upfront, the framework allows load and suppliers to manage changing capacity risk through bilateral contracts rather than relying on ongoing administrative determinations by PJM. Contracting parties are best positioned to allocate commercial risk, price it appropriately, and structure agreements that reflect shared expectations about performance and value. This market-based approach is more flexible and efficient than requiring load and suppliers to forecast or absorb year-to-year changes in ELCC driven by factors such as a changing resource mix that cannot be meaningfully predicted or hedged by individual suppliers. Requiring annual UCAP revalidation effectively forces parties to underwrite this uncertainty, raising costs and deterring participation.</p> <p>Early over procurement provides a straightforward reliability backstop while preserving contractual certainty. Together, these elements lower financing and contracting costs and support timely entry of new, cost-effective capacity consistent with PJM's objectives.</p>
1. Natural Resources Defense Council	<p>NRDC appreciates PJM's effort and initial presentation. We continue to disagree with the Board's decision to include connect and manage load in RPM, but acknowledge that is out of scope for the CAMSTF.</p> <p>With that caveat, we generally agree with PJM's initial framework. We have some feedback on details of the initial concept:</p> <ul style="list-style-type: none"> * Since any Capacity Resource can meet the BYO requirement, not just generation, can we call it BYONC? * We agree with PJM's proposal that reductions in UCAP associated with ELCC updates should not affect BYONC status. This reduces risk and gives a clearer incentive for new large loads to BYO. <p>Regardless of ELCC, a large load that offers its entire ICAP as DR or PRD should meet BYO requirements.</p> <ul style="list-style-type: none"> * Only capacity that is deliverable to the large load should be eligible as BYO. * There is a timing mismatch between when a large load adds RPM demand and when its BYO resource adds supply. This could cause artificially high capacity prices for up to four years. To avoid this, we suggest that large loads that elect to BYO from a source that is not yet offering into RPM also be kept out of the demand curve until their BYO is able to offer. Otherwise, PJM will purchase unnecessary capacity on behalf of that large load. * Determination of shortages should probably consider locational deliverability. A shortage in a constrained LDA is an issue even if the RTO overall is not short. * It would be ideal if the estimated shortage was determined early enough for large loads to consider offering DR into the BRA rather than getting put into connect and manage. <p>For additional education, it would be helpful to learn more about the interaction between state jurisdictional DR programs and PJM markets. What actions can a state take to reduce the impact of large loads on wholesale costs? If a state puts large loads on interruptible rates, how could that be recognized in the load forecast or RPM? Can states mandate participation in PJM DR/PRD? Would state actions to reduce or shape data center load affect the load forecast?</p>

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1. Bluebird Solar LLC	<p>MN8 Energy appreciates the time and effort PJM is dedicating to the Connect-and-Manage (C&M) and Bring-Your-Own-New-Generation (BYONG) programs, and the opportunity to share feedback on its conceptual proposal.</p> <p>Designed properly, C&M and BYONG represent the biggest opportunity for PJM to attract significant volumes of new UCAP in the near-term. Given the growing shortfall between demand and the supply of capacity, PJM is proposing to curtail new large load customers first during system-wide energy scarcity events. If BYONG is a lever that these loads can pull to avoid C&M, it will send a strong incentive for them to contract for new UCAP. If many or all new loads do this, it will substantially address the resource adequacy shortfall, reducing reliability risks and abating billions in capacity market costs to everyday consumers. Critically, BYONG would achieve this without the risk of stranded costs being allocated to ratepayers and at lower overall prices for large loads than under the Reliability Backstop Procurement (RBP).</p> <p>Overall, PJM's conceptual proposal for BYONG appears to be workable; we offer feedback on several items below. Above all, there is still risk that this program is pre-empted by the RBP because PJM's timeline may not allow for C&M/BYONG to be finalized with FERC before conducting the RBP. PJM should ensure that the RBP does not close until after C&M and BYONG are finalized.</p> <p>We offer the following perspectives on PJM's conceptual proposal:</p> <ol style="list-style-type: none"> 1. UCAP obligations <ol style="list-style-type: none"> a. We support the direction of PJM's proposal for establishing UCAP obligations because it appears to be both commercially workable and consistent with how these obligations will be set under the RBP. b. PJM should clarify how it intends to establish the additional XX% requirement. Two ways it could achieve this include: <ol style="list-style-type: none"> i. For a given resource type, require that the load match to a Year 1 ICAP amount equal to the average UCAP for the resource over the reliability risk period. XX% will vary based on the resource type and PJM's ELCC forecast over the reliability risk period. ii. For all BYONG, set XX% to cover the difference between the start-of-period and the average AUCAP factor over the reliability risk period. This may be simpler to administer by standardizing the over-procurement percentage for all resource types. 2. BYONG contract showing <ol style="list-style-type: none"> a. From the conceptual proposal, it seems that PJM would be requesting info on BYONG resources three years out purely for informational purposes to inform expectations of how short the market will be in a given delivery year. b. While it is reasonable to solicit information at this stage, large loads should not be expected to show binding contracts for new supply until much closer to the delivery year. c. We support PJM's proposal to require BYONG resources to offer and clear in a PJM capacity auction (including the IAs). 3. Reflecting BYONG into the RBP demand target <ol style="list-style-type: none"> a. PJM's current proposal is to rely on EDCs to tell them how much load should be procured for in the RBP and how much will BYONG. b. MN8 continues to advocate for large loads to opt into the RBP. If EDCs direct PJM to push MWs into the RBP for loads that actually wanted to BYONG, it will result in higher costs for these loads. If EDCs include loads that don't actually materialize, it will result in stranded

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	<p>costs that ultimately get passed on to ratepayers.</p> <p>c. If PJM continues to propose that large loads should opt out of the RBP, it should ensure that (1) planned procurement targets for each EDC are clearly specified well in advance of the RBP and (2) BYONG showings are not unduly onerous.</p> <p>i. (1) is essential so that EDCs understand what they will be allocated and how much they should opt out for if, for example, one of their large loads wants to BYONG.</p> <p>ii. (2) is appropriate because in some cases, offtake agreements are not finalized until a year or two before a resource comes online. PJM's preliminary verification of BYONG should therefore be based on an indicator like (1) demonstrated capability to execute a bilateral agreement, (2) ongoing commercial negotiations with one or more suppliers, or (3) an executed terms sheet.</p> <p>4. Firm service level vs guaranteed load drop</p> <p>a. Under PJM's current proposal, area eligibility C&M assignments are determined ex ante at the start of a delivery year.</p> <p>b. PJM's current proposal appears to be consistent with a guaranteed load drop curtailment framework. While PJM says that its maximum curtailment assignment during an event will be limited to the eligible C&M loads, it is not clear what would happen if the eligible loads were already online at a level below their MW assignment. In this instance, there is risk that PJM passes along a curtailment call to an area that cannot be met by C&M loads, which could result in the curtailment of BYONG loads as well.</p> <p>c. PJM should use a firm service level curtailment framework by ensuring that curtailment assignments are limited to the real-time load levels of eligible C&M loads. This will protect BYONG loads from premature curtailment, thus preserving the incentive for these loads to BYONG.</p> <p>5. Essential load designations</p> <p>a. Any load that wants to be designated as "essential load" and is therefore not curtailed before pre-emergency DR should be required to BYONG. To do otherwise introduces the potential for gaming, which undermines the viability of the C&M/BYONG programs.</p> <p>b. We recognize that enacting this requires action at the state (versus PJM) level, but include the concern here for stakeholder consideration.</p>

Question 2	
Company Name	Do you have any additional questions for PJM?
1. Campbell Energy Advisors, LLC	N/A
1. New Jersey Board of Public Utilities	N/A
1. Dynegy Marketing and Trade, LLC	N/A
1. Mainspring Energy, Inc.	If you believe the RTO trigger is the best route, can you please provide analysis to support this conclusion? Can you please offer analysis of alternative triggers discussed above? Thank you for your important work on these matters.
1. Camus	First, how does PJM envision the relationship between the two issue charges being addressed in the CAMSTF? PJM's issue charge focuses on RTO/zone-level capacity shortfalls. Exelon's issue charge focuses on transmission constraints. Does PJM expect these to produce separate but complementary frameworks, or does PJM intend to address transmission constraint management within the C&M framework? Second, (and relating to the first education topic suggested above) what role does PJM see itself playing in the transmission planning analysis needed to identify when and what curtailment of non-firm large load is needed at specific sites? We would find it helpful to understand PJM's view on the division of planning responsibilities between PJM and TOs, particularly for the site-specific studies needed to provide large loads and TOs with the transparency into potential curtailment magnitude and frequency that both issue charges contemplate. Proposed interests for the CAMSTF Interest Identification matrix: For: Implementation of Connect and Manage Framework for Large Load Interconnections 1) The C&M trigger should address local transmission constraints and local capacity delivery limitations, not only RTO-wide resource adequacy shortfalls For: Large Load Customer Flexibility 1) Clarify the division of roles and responsibilities between PJM and TOs for identifying site-specific transmission constraints and curtailment requirements for non-firm large loads. 2) Identify transmission planning tools and study methodologies needed to evaluate large load customer flexibility options on a site-specific basis, including 8,760-hour analyses where appropriate 3) Provide large loads and TOs with transparency into the expected magnitude and frequency of potential curtailment to support planning and investment decisions 4) Ensure the framework developed under Exelon's issue charge is complementary to and coordinated with the C&M framework developed under PJM's issue charge
1. Calibrant Energy	First, how does PJM envision the relationship between the two issue charges being addressed in the C&M STF? PJM's Issue Charge focuses on RTO/zonal-level capacity shortfalls. Exelon's Issue Charge focuses on transmission constraints. Does PJM expect these to produce separate but complementary frameworks, or does PJM intend to address transmission constraint management within the C&M framework? Second, what role does PJM see itself playing in the transmission planning analysis needed to identify when and what curtailment of non-firm large load is needed at specific sites? We would find it helpful to understand PJM's view on the division of planning responsibilities between PJM and TOs, particularly for the site-specific studies needed to provide large loads and TOs with the transparency into potential curtailment magnitude and frequency that both issue charges contemplate.
1. American Clean Power Association	No.

Question 2	
Company Name	Do you have any additional questions for PJM?
1. Constellation Energy Generation, LLC 2. Constellation NewEnergy, Inc. 3. Calvert Cliffs Nuclear Power Plant, LLC 4. Handsome Lake Energy, LLC	<p>• In its March 31 CAMSTF presentation, PJM stated its desire that curtailment under Connect and Manage would not result in artificial energy market price suppression. Constellation appreciates and supports this objective as proper energy market price formation that reflects system needs and operator actions is among the most important goals of an efficient and functioning energy market. PJM should provide additional education and, if it continues to pursue its Connect and Manage proposal, it should include design components to ensure that curtailment under Connect and Manage does not impact proper energy price formation.</p> <p>• How will PJM factor in overlap between its RBA proposal and its Connect and Manage proposal? For example, if the BRA/RBA brings in sufficient resources to serve all planned load, is the Connect and Manage proposal obviated? Are these two proposed mechanisms intended to work together to ensure resource adequacy and, if so, how? If they are intended to operate as isolated mechanisms designed to ensure resources adequacy, can PJM explain why pursuing both paths separately is an efficient path forward?</p> <p>• How does PJM intend to honor the Commission's directives in the Show Cause Order, which specifically provides a pathway for new large, co-located load to interconnect and receive service under Interim NITS prior to network upgrades being built without the requirement that they bring new generation?</p> <p>• In its March 31 CAMSTF presentation, PJM stated that Interim NITS and Non-Firm Contract Demand Services load will be curtailed before Connect and Manage load. Can PJM explain the rationale for this prioritization? In the Show Cause Order, the Commission approved both Interim NITS and Non-Firm Contract Demand Service to help facilitate the faster interconnection of new large loads by encouraging them to co-locate with generation. The need to match, and incentivize the matching of, load and generation is, according to PJM, the reason it is developing the Connect and Manage framework. Therefore, it appears counterproductive and unduly discriminatory to first curtail load that has co-located with generation (which reflects a physical "matching") before load that has not made similar arrangements.</p>
1. Flatiron Energy	N/A
1. Natural Resources Defense Council	N/A
1. Bluebird Solar LLC	N/A