

**Stakeholder Feedback on Connect and Manage Senior Task Force Survey Responses**

<b>Question 1</b>	
<b>Company Name</b>	<b>Based on the presentations and concepts discussed at the April 10, 2026 CAMSTF meeting, do you have any feedback for PJM and/or is there any additional education that would be helpful and why?</b>
1. New Jersey Board of Public Utilities	Staff encourages PJM to, prior to the April 22nd MRC meeting where the IL CUB modifications to the Connect and Manage Issue Charge will be voted on, release potential BRA clearing capacities, clearing prices, and costs to load for a range of potential Connect and Manage and supply scenarios, including scenarios where the BRA would clear below the cap. In addition to the two scenarios offered by PJM last week illustrating the BRA clearing at the cap, it is possible that the proportion of new large loads to supply that enter the BRA are such that removal of the new large load from the demand stack results in the auction clearing below the cap. PJM's analysis of a range of supply and new large load demand scenarios that also considers the removal of new large loads from the demand stack would provide stakeholders with a more complete range of BRA impacts that removing large loads may have. Awareness of the full range of BRA impacts would allow stakeholders to develop an interim solution that better manages reliability challenges during the transition period, when new load additions are outpacing capacity additions.
1. Convergent Energy and Power LP	Convergent appreciates the opportunity to provide input on the development of the "connect and manage" framework for new large loads. We believe that additional education, particularly through the use of illustrative examples, would be highly valuable in demonstrating how the framework applies across a range of real-world scenarios. While the flow chart presented by Tim Horger is a helpful starting point, stakeholders may reasonably differ in how they interpret its application. To address this, PJM should consider providing worked examples that apply the flow chart to different supply arrangements and fact patterns. Doing so would promote a shared understanding among stakeholders and help ensure consistent and predictable implementation of the framework.

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1. Voltus, Inc.	<p>Voltus greatly appreciates the intensive work that PJM has undertaken over the past few months to pursue, in tandem, the several directives of both the Jan 16 Board Decisional Letter and the White House + PJM Governors' Statement of Principles. In particular, Voltus thanks the PJM team for the helpful Connect &amp; Manage + BYONG Initial Conceptual Thoughts which, together with the April 10 Reliability Backstop Proposal, take significant steps towards clarifying the intended interactions between CAM, BYONG, and RBP. This clarification helps both supply and load begin to understand the incentives—the sticks and carrots—that define the market context within which the development of new supply will occur.</p> <p>At this stage, Voltus offers only a few comments and questions, and looks forward to providing additional feedback as the CAM/BYONG proposals develop.</p> <p>First, Voltus commends the inclusion of new DR and DER resources as eligible supply under BYONG, in line with their inclusion in the RBP per the April 10 proposal. Voltus thanks PJM for considering the input from industry, the PJM Legislators' Collaborative, and other parties—both within and alongside the stakeholder process—in developing its CAM/BYONG/RPG design to recognize the readiness, reliability, clean energy attributes, and consumer benefits of BTM UCAP. In implementation, it will be important to define “new” in a way that is operationally practical while creating proper incentives. For example, facilities that currently participate, or have participated, in demand response in the past may install new behind-the-meter batteries to meet PJM’s need for new capacity. Such batteries should count as “new” and therefore be eligible as BYONG despite being at the same utility account as an existing demand response resource. In the March 31 CAM/BYONG conceptual presentation, PJM states that “BYONG is New and Incremental PJM Capacity Resources (procured bilaterally or through Reliability Backstop and reflected in RPM) including New Demand Response (Pre-emergency and Emergency) that was not included in the prior DY auction.” Voltus appreciates this definition, which is more expansive than the current definition of eligible UCAP for the RBP Central Procurement. As stated above, Voltus's position is that any definition of newness for DR should account for the situation in which an existing location (one which participated in the prior DY auction) installs a new on-site battery or other new investment that can add new supply. PJM expressed receptiveness to this idea, with respect to RBP Central Procurement eligibility, during the April 16 RBP CIFP meeting. Voltus appreciates this and agrees with PJM that if a particular resource is eligible for the Central Procurement, it should also be eligible for CAM-avoiding BYONG.</p> <p>Second, echoing a discussion point raised during the initial two CAMSTF meetings, Voltus strongly recommends changing the term “BYONG” to either “Bring Your Own New Capacity” or “Bring Your Own New Supply” to better reflect the eligible resources that loads may contract with to reduce their CAM exposure. Voltus understands that PJM is already considering this change and thanks the team for this consideration.</p> <p>Third, Voltus notes that several stakeholders have raised the issue of the CAM “trigger”: under what conditions and in what years is a load that comes online potentially exposed to CAM? These stakeholders have suggested local triggers in addition to the RTO-wide shortfall. While PJM’s proposal targets RTO-wide Resource Adequacy, locational triggers could additionally address local transmission constraints. Voltus sees merit to the proposal to add additional triggers but seeks further education on what such triggers might be, how they would</p>

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	<p>compare with the triggers for dispatching the Emergency Load Response Program, and what PJM has considered on this front. It is possible that Exelon's Large Load Customer Flexibility Issue Charge will provide a CAM-style framework for local constraints, but further expansion on this Issue Charge, and its interaction with CAM/BYONG, is needed.</p> <p>Fourth, Voltus seeks further explanation of the design decision to not allow transfer of a large load's BYONG contract to another large load, and what other options stranded BYONG capacity would be left with.</p> <p>Finally, Voltus seeks clarification of the impacts of the designation of a given Delivery Year as one where PJM either is or isn't operating under a CAM framework. Say Load 1 is slated to come online in DY 29/30, and Load 2 in 30/31, and that 29/30 clears short in the BRA but 30/31 does not. First, does this mean that CAM applies in 29/30 but not 30/31? If so, does this mean that Load 1 would not be exposed to CAM curtailment in 30/31 or any future year, regardless of whether it brings new capacity or does DR? More foundationally, Voltus asks whether it is PJM's expectation that the BRA shortfall will be monotonically decreasing, such that once the CAM transition period ends, CAM won't apply in future years. Voltus raised the question during the April 17 RBP CIFP meeting, and PJM responded that CAM was being conceived as a transitional mechanism that would definitively end (and not restart). PJM further offered that clarification would be provided on this point. Voltus thanks the various PJM teams and raises the discussion in this forum as well for visibility.</p> <p>Thank you again for PJM's thoughtful efforts in developing the CAM/BYONG concept and relating it to the work ongoing in related stakeholder fora. Voltus looks forward to continued participation in this dynamic stakeholder process.</p>

Question 2	
Company Name	Do you have any additional questions for PJM?
1. New Jersey Board of Public Utilities	N/A
1. Convergent Energy and Power LP	<p>Convergent has two sets of questions to offer at this time. The first is a list of statements we would like for PJM to confirm the accuracy of, and if not why. The second is a list of questions about clarifying aspects, which should be factored into any final program language to provide as much certainty as possible for market participants.</p> <p>Can PJM please confirm the accuracy of these statements:</p> <ul style="list-style-type: none"> <li>• BYONG obligations can be satisfied with a portfolio of new resources.</li> <li>• Partial BYONG is allowed for a portion of a New LL's load, with CAM accounting for the rest of the load.</li> <li>• Onsite DR is acceptable to fulfill a portion of a new LLs BYONG commitment</li> <li>• Incremental BYONG is allowed so New LLs can enter PJM under CAM, and gradually reduce their exposure to curtailment</li> </ul> <p>Can PJM please address the following requests for clarity:</p> <ul style="list-style-type: none"> <li>• Can PJM please provide a clear definition for "New LLs" that specifies how long New LLs subjected to CAM will be considered "New"?</li> <li>• How do CAM, BYONG, and PJM's proposed new transmission services under Docket EL25-49 interact? More specifically, if a LL customer opts for BYONG that accounts for their entire load, which transmission service option will they be served under?</li> <li>• The existing trigger for CAM is PJM Supply &lt; RTO Reliability Requirement – would it be possible to add more localized locational triggers of CAM?</li> </ul>
1. Voltus, Inc.	N/A

Question 3	
Company Name	Based on the post meeting matrix and discussion, do you have other design components that you would like to share? Please note design components will need to be within the approved Issue Charge scope.
1. New Jersey Board of Public Utilities	<p>Staff does not think that Connect and Manage should apply only during years when the RTO Reliability Requirement exceeds PJM supply. Rather, Staff thinks that concurrent with removing Connect and Manage load from the BRA demand stack, PJM should set a certain number of years (e.g., 3-5) in which the RTO Reliability Requirement is equal to or greater than PJM supply, before Connect and Manage no longer applies to new large loads. Staff believes there is a risk of volatility and drastic fluctuations in the capacity market if the Connect and Manage determination is based solely on a single-year status update, given that Staff strongly advocates for removing Connect and Manage new large loads from the demand stack.</p> <p>In a similar vein, Staff thinks there should be a minimum term limit for bilateral contracts for new large loads seeking to avoid Connect and Manage status. A new large load could hypothetically bring demand response for 2 years, then be exempt from Connect and Manage status, with the DR disappearing from the supply stack after this time. Staff suggests that PJM issue a minimum term length for these contracts to avoid short-term contracts that leave us with reliability shortfalls only a few years in the future. To conform with the RBP proposal, such a minimum term length should also apply to the term for the RBP's central procurement.</p> <p>Lastly, Staff thinks it's important for PJM to develop an open database that tracks data centers, in which EDCs, in collaboration with state commissions and data centers, can upload information regarding whether specific data centers have elected for BYONG, Connect and Manage, or for their EDCs to procure firm service on their behalf through the RBP central procurement. This transparency would foster more productive decision-making at the state, regional, and federal levels.</p>
1. Convergent Energy and Power LP	N/A
1. Voltus, Inc.	N/A

Question 4	
Company Name	Based on the post meeting matrix and discussion, do you have other solution options that you would like to share? Please note solution options will need to be within a design component and the approved Issue Charge scope.
1. New Jersey Board of Public Utilities	N/A
1. Convergent Energy and Power LP	N/A
1. Voltus, Inc.	N/A