

Draft Tariff Language for January 20, 2026 Co-Located Load Compliance Filing Poll Responses Without Attribution

Please respond with any feedback you would like PJM to consider regarding the draft Tariff language addressing the Jan. 20, 2026 Co-Located Load Compliance Filing.

The definition of Co-Located Load includes the capitalized term "Point of Change in Ownership", suggesting that this is a defined term. I could not find a definition for Point of Change in Ownership. This term may be defined in the New Service Request.

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While we recognize that this filing is limited to clarifying the use of existing interconnection tools, we emphasize that the Commission's order clearly contemplates the development of meaningful non-firm "bridge" pathways that allow projects to interconnect and operate prior to completion of all network upgrades, with reliability preserved through enforceable operating limits and operational management rather than by default reliance on worst-case planning assumptions. We urge PJM to ensure that the clarifications adopted in this filing do not embed assumptions that would later foreclose such non-firm bridge service, whether implemented through future tariff revisions, new transmission service options, or other means.

Especially given the FERC's Order directing a threshold below which BTMG netting would continue as well as the transition period in the Order, we recommend retaining the existing BTMG section as is and instead add a new section 3 entitled "Co-Located Load Application Requirements that essentially replaces all BTMG references with Co-located Load References. We believe that would result in a few more replacement changes than what was in the initial draft.

We also note that the Co-Located Load definition refers to "Generating Facility". We wanted to confirm whether that is a defined term in the tariff. It warrants considering whether the definition would include batteries.