

March 11, 2026

To Michele Greening and Mollie Lacek –

Enchanted Rock appreciates PJM’s continued engagement with stakeholders regarding its compliance with FERC’s order on co-location.¹ Enchanted Rock submits these comments to raise concerns that the new Interim Network Integration Transmission Service (“NITS”), as contemplated, may not be consistent with the intent of the Co-Location Order.

When curtailed, Co-Located Loads cannot rely on their Co-Located Generating Facilities

Enchanted Rock is concerned that when new, temporary non-firm Co-Located Loads are curtailed, they cannot rely on their own temporary non-firm Co-Located Generating Facilities during the Interim NITS period.

Specifically: *if curtailed, EC [Eligible Customer] cannot take energy from co-located generator (no netting under system conditions that required curtailment).*²

As shared on February 13, 2026, in written feedback,³ Enchanted Rock believes that PJM’s proposed approach to implementing Interim NITS will inappropriately treat new non-firm Co-Located Generating Facilities as equivalent to full PJM Resources *prior* to receiving firm Network Resource status (*i.e.*, during the period in which an Eligible Customer is taking Interim NITS).

Since Enchanted Rock submitted its written feedback, it remains unclear whether PJM will permit curtailed new Co-Located Loads served via Interim NITS to be supplied energy by new Co-Located Generating Facilities—whether such new Co-Located Generating Facilities were to be self-developed by the Eligible Customer or contracted with via a third-party.

If PJM intends to prevent Co-Located Generating Facilities from supplying energy to Co-Located Load during the period in which Co-Located Load is served via Interim NITS, it would almost certainly deter large load customers from utilizing Interim NITS if they cannot rely upon their own Co-Located Generating Facilities, thereby disincentivizing the development of new co-located generation resources and effectively nullifying Interim NITS as a viable transmission service option and commercial pathway before it is even implemented.

¹ *PJM Interconnection, L.L.C.*, 193 FERC ¶ 61,217 (2025) (“Co-Location Order”).

² *PJM Staff Preliminary/Working Draft of Concepts as of January 23, 2026*, 4, (Jan. 23, 2026), [20260126-item-01---transmission-services-concepts-for-discussion.pdf](#) (“PJM’s Draft Concepts”)

³ James Huang, Implementation of the Co-Located Load Order, 12, (Feb. 18, 2026), [20260220-co-located-load-order-workshops-stakeholder-feedback.pdf](#)

Establishing a mechanism to allow Co-Located Generating Facilities undergoing interconnection studies to serve energized Co-Located Loads taking Interim NITS

Enchanted Rock appreciates PJM’s recognition that Co-Located Loads and Co-Located Generating Facilities may be energized on different schedules—allowing for power to be drawn from, or injected into, the transmission network on a non-firm, as-available basis.

Specifically: Conditions for co-located generator to be in commercial operation by a certain point (recognizing that generator and load may be on different developmental timelines).⁴

PJM should establish a mechanism to address the scenario where a Co-Located Load, taking Interim NITS, is energized *before* its paired Co-Located Generating Facility completes its interconnection studies. Specifically, the PJM tariff should allow a Co-Located Generating Facility to serve its Co-Located Load directly—without grid injection—while still being studied through the applicable generator interconnection study process. Such tariff changes will ensure that Co-Located Generating Facilities can serve their temporary purpose as the backstop for the already-active temporary non-firm load. Failure to make such changes would further degrade the efficacy of Interim NITS before it is implemented.

Co-Located Loads are served by Interim NITS first and by their Co-Located Generating Facilities second

Finally, Enchanted Rock agrees with PJM that Co-Located Loads take temporary non-firm transmission service under Interim NITS as their primary source.

Specifically: Default is that customer takes interim NITS and require notice for any deviation from default.⁵

Interim NITS operationalizes grid flexibility, which permits Co-Located Generating Facilities to *periodically and temporarily* supply energy to large load customers when necessary but provides large load customers with continued access to the transmission network during normal operating conditions (*i.e.*, the majority of the year). By leveraging non-firm transmission service to draw from the transmission network based on its availability, Artificial Intelligence (“AI”) data center developers in particular can achieve the speed to market they require while not negatively impacting overall grid reliability.

While PJM’s Draft Concepts conceptually support this temporary and flexible use of the grid, the Illustrative Tariff Revisions lack specific language to effectively codify this construct. Enchanted

⁴ *PJM Staff Preliminary/Working Draft of Concepts as of January 23, 2026*, 4, (Jan. 23, 2026), [20260126-item-01---transmission-services-concepts-for-discussion.pdf](#)

⁵ *Id.* at 3.

Rock encourages PJM to include additional specificity in its final tariff revisions that it will submit to FERC, otherwise Interim NITS will not be able to be effectively utilized.

Questions

In response to PJM’s solicitation for questions, Enchanted Rock would appreciate responses to the following questions regarding Interim NITS:

For a new 100 MW Co-Located Load paired with a new 100 MW Co-Located Generating Facility, is the Interim NITS customer required to reserve a specific quantity of non-firm transmission service?

If a reservation is not required, how is the available non-firm capacity determined?

Will PJM dynamically adjust the available non-firm capacity based on real-time system generation and transmission constraints (*e.g.*, varying by hour, day, or season)? If so, does PJM act as the managing entity that “allocates” available headroom to the Interim NITS customer?

Alternatively, is the temporary non-firm service provided as a fixed, static quantity for the duration of the interim period?

If the allotted non-firm transmission service is static and falls below the load’s 100 MW of demand (*e.g.*, a 60 MW limit), what are the operational expectations for the paired generating facility?

Specifically, in a scenario where only a static 60 MW of non-firm transmission service is available during the interim, is it anticipated that the Co-Located Generating Facility will need to maintain a high-capacity factor (operating between 40 MW and 100 MW)?

Conclusion

Enchanted Rock appreciates the ongoing engagement with PJM and its stakeholders. We look forward to working together to ensure the final Interim NITS implementation is a commercial success that aligns with the spirit and intent of FERC’s Co-Location Order.

Sincerely,

/s/
James Huang
Director, Wholesale Markets Policy
Enchanted Rock
jhuang@enchantedrock.com