

Co-Located Load Order Workshop Stakeholder Feedback Poll	
Question 1	
Company Name	During the July 30 Co-Located Load Order Workshop, several stakeholders referenced other constructs or proposals for PJM to consider in developing Section 205 framework. What additional feedback specific to other constructs/proposals for PJM consideration would you like to provide to PJM?
1. Geenex Solar LLC	Modifications to the Generator Interconnection process should include changes that speed up the application review process. Lessons from TC2 & C01 should be taken to better understand what is important for a good GI project (access to POI etc) and not cumbersome reviews that slow down the process (specific lease language restrictions for site control).
1. Calvert Cliffs Nuclear Power Plant, LLC 2. Constellation NewEnergy, Inc. 3. Constellation Energy Generation, LLC 4. Handsome Lake Energy, LLC 5. Champion Energy Services, LLC 6. Champion Energy Marketing LLC 7. Champion Energy, LLC 8. Calpine Energy Services, L.P. 9. Calpine Energy Solutions, LLC 10. Calpine Mid Atlantic Marketing, LLC 11. North American Power and Gas, LLC 12. Calpine Bethlehem, LLC	Constellation welcomes this opportunity to provide feedback on this important issue and would like to drill down on a point we made during the workshop where we think PJM can make significant progress without significant additional effort. Specifically, in the PJM Large Load ANOPR Show Cause (see https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20260618-3105 [elibrary.ferc.gov]) (at P 99), FERC expressed “concern[] that the absence of generator interconnection study procedures and generator interconnection services facilitating the interconnection of a new generating facility that is being brought onto the transmission system in order to serve . . . [a] large co-located load will result in PJM’s current generator interconnection process failing to keep pace with the new large loads seeking to be integrated onto PJM’s transmission system.” In response to this concern, FERC suggested (at P 98) “a potentially reasonable approach to address our concern could be to develop a generator interconnection study process that would allow the use of existing ERIS or NRIS of an existing generator to connect a new generation facility and a new large load behind the same point of interconnection of the existing generating facility with necessary control technologies and and/or protection systems . . . that ensure that the net injection does not exceed the amount in the existing generator interconnection agreement.” FERC cited to a Constellation filing in the original large load ANOPR as support for its suggested approach where we lay out the specifics of our proposed Load-Contingent New Capacity at Existing Plants (LCEP) (See https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20260605-5050 [elibrary.ferc.gov]). We hope that PJM will consider implementing an LCEP mechanism similar to the one in our already-developed proposal as part of its compliance package. The Constellation filing includes a summary of how an LCEP mechanism could work (See Appendix), including in PJM and, we would be happy to provide further information or set up a call if helpful. Thank you very much for your attention to this matter.
1. Dayton Power & Light Company (The)	The stated concerns about lack of transparency and a need to post on the PJM website information about the large loads. Our Data Center customers generally have confidentiality concerns, we are unsure if the PJM suggestion that all data center load be posted could cause a problem? Will it be aggregated sufficiently that we and our customers would be OK with it? Willing to provide data for PJM use, but only masked public posting. - PJM/TO should consider posting the following at a minimum: (1) the aggregate amounts of proposed large load additions in PJM’s footprint, including the aggregate amounts in each transmission pricing zone; (2) the planned Network Upgrades needed to provide transmission service to Eligible Customers on behalf of large loads, identified by type of equipment and Network Upgrade (e.g., new substation, reconductoring, a new high-voltage transmission line) for each transmission service request; and (3) cost estimates for those Network Upgrades.
1. Data Center Coalition	The Data Center Coalition (DCC) appreciates PJM’s continued stakeholder engagement as it develops its response to the Order to Show Cause. We recognize that the concepts discussed to date remain preliminary, and DCC is continuing to evaluate their potential implications. Accordingly, our comments at this stage are intended to highlight overarching objectives and identify areas where additional discussion would be beneficial. As PJM moves forward, DCC believes any compliance approach should be guided by the following principles: 1) Provide a transparent process for the provision of transmission service for large load. The process should clearly identify the transmission upgrades necessary to serve new large loads, establish minimum and transparent study requirements, and provide customers with commercially useful information regarding costs, timelines, and available service options. 2) Preserve appropriate cost responsibility. The framework should ensure that customer-specific costs are appropriately and transparently identified and not shifted to other customers, while adequately addressing stranded cost risk. At the same time, changes made in response to the Order to Show Cause should not inadvertently undermine or substitute for effective regional transmission planning. 3) Support the efficient interconnection of both load and generation. Any new or enhanced transmission service process should complement—not slow down—the overall interconnection process. It is important to avoid unnecessary layering of studies or other process changes that could delay projects. A well-functioning generator interconnection process remains critical to addressing PJM’s current resource adequacy challenges, and any changes should not delay or otherwise impede the timely interconnection of new generation resources. 4) Maintain workable pathways for co-located and phased development. Options for interim service, phased energization, i-NITS, Firm and Non-Firm Contract Demand, and other flexible service arrangements should be not only available but commercially viable. 5) Ensure operational requirements are transparent and commercially feasible. Any new operational requirements should be clearly defined, predictable, and practical to implement. It is unclear that PJM’s proposed conceptual approach meets these principles, and DCC believes additional stakeholder education and discussion would be valuable before more fundamental reforms are considered. In particular, we encourage PJM to provide stakeholders with a detailed briefing on MISO’s Expedited Project Review (EPR) process, including how MISO evaluates transmission service requests for large loads, identifies required upgrades, allocates cost responsibility, and facilitates the efficient interconnection of large load. Likewise, if PJM continues to seek broader changes to interconnection and regional planning, DCC believes that PJM stakeholders would benefit from a discussion of SPP’s Consolidated Planning Process (CPP), including its key elements, expected benefits, and lessons learned from its development and implementation. DCC also believes PJM’s compliance efforts should remain focused on addressing the objectives of the Order to Show Cause. If PJM determines that broader reforms to the interconnection or regional planning framework warrant consideration, those discussions should proceed through a deliberate stakeholder process rather than being accelerated solely to fit within the compliance timeline. Maintaining an efficient generator interconnection process while enhancing transparency for large load transmission service is essential to meeting PJM’s reliability and resource adequacy needs. Finally, DCC believes that any changes adopted through this proceeding—including those made to comply with the Order to Show Cause—should be implemented prospectively. The transition should preserve existing rights and arrangements and avoid disrupting projects already under development or progressing through established processes. Regulatory certainty and an orderly transition are important for both generation and large load projects already in flight.
1. Camus Energy	FERC’s Large Load Show Cause and Co-Located Load Orders recognize the value of load flexibility. By reducing withdrawals from the grid during the few hours of system constraint that trigger the need for grid upgrades, a flexible load (used here to include loads that can reduce system withdrawals with or without co-located generation) has the potential to interconnect far more quickly and at far lower cost than a load with firm interconnection of similar magnitude. This flexibility improves the utilization of existing grid infrastructure and can benefit all ratepayers by enabling the timely integration of loads that distribute fixed system costs over a larger volume of energy sold. Large loads, generators serving those loads, and ratepayers will only experience these benefits if study processes enable this flexibility. As PJM works to refine requirements and processes for large load interconnection, Camus urges PJM to ensure flexible large loads are recognized and offered an expedited study pathway. Camus understands the “Conceptual Approach” introduced in the July 30 workshop to propose to integrate the study of transmission services for large loads, including flexible large loads, into a single New Services Request Process. While Camus appreciates PJM’s intent to accelerate the overall New Services Request Process, combining the study of large load transmission service requests into a single, consolidated process could prevent large loads from realizing and delivering the benefits of load flexibility. A consolidated process could pose delays to flexible large loads incompatible with the investment timelines of large load customers. Even at 12 months, a consolidated study process falls short of FERC’s suggestion that PJM consider study accelerated to the order of 60-90 calendar days (Large Load Show Cause Order at paragraphs 63-64). Camus recommends that PJM further assess separate, dedicated pathways for the study of flexible large loads and for the coordinated study of generation matched to large loads. The pathways that FERC identifies in Part III(D) of the Large Load Show Cause Order are an appropriate starting point. These pathways describe load integration approaches that uphold reliability while minimizing or avoiding the need for network upgrades to serve large loads, including via arrangements with co-located or “proximate” generation. Camus urges PJM to consider how such pathways could be advanced in parallel to a consolidated New Services Request Process. For example, SPP’s High Impact Large Loads Generator Assessment (HILLGA) and Conditional High Impact Large Load Service (CHILLS) models are a useful reference for PJM’s efforts to refine study process associated with Interim NITS – enabling the timely review of large load interconnections on a separate track from the Consolidated Planning Process. If PJM is inclined to integrate the study of non-firm transmission service for large loads into a cluster process, Camus urges PJM to ensure that load flexibility is recognized in that study process. ERCOT’s Provisional Controllable Load Resource (PCLR) framework offers an especially useful model. PCLR enables large loads to function as dispatchable resources for the portion of their load above a firm “Low Power Consumption” level and below a desired peak load “Maximum Power Consumption.” This framework unlocks accelerated speed to power for large loads capable of adjusting withdrawals according to real-time dispatch, either with or without co-located generation. PCLR offers an example of how PJM’s new transmission services could maximize benefit to large loads and to the grid, e.g., in combinations of firm and non-firm contract demand service, when the dynamic flexibility of large loads is recognized and activated.

Co-Located Load Order Workshop Stakeholder Feedback Poll	
Question 2	
Company Name	Based on the information presented at the July 30 Co-Located Load Order Workshop, what other feedback would you like to provide to PJM?
1. Geenex Solar LLC	Speed of review for Phase 1 should be prioritized over accuracy. If the goal is to complete 2 phases in 1 year then the cull should happen as quickly as possible.
1. Calvert Cliffs Nuclear Power Plant, LLC 2. Constellation NewEnergy, Inc. 3. Constellation Energy Generation, LLC 4. Handsome Lake Energy, LLC 5. Champion Energy Services, LLC 6. Champion Energy Marketing LLC 7. Champion Energy, LLC 8. Calpine Energy Services, L.P. 9. Calpine Energy Solutions, LLC 10. Calpine Mid Atlantic Marketing, LLC 11. North American Power and Gas, LLC 12. Calpine Bethlehem, LLC	Please see our response to Question 1 above.
1. Camus Energy	During the July 30 workshop, PJM Staff described plans to engage stakeholders in further review of load curtailment hierarchy and process associated with new transmission services. Camus looks forward to further discussion on this subject, and offers the following concepts to inform PJM's Tariff and manual development to ensure large loads deliver meaningful flexibility: 1. Transparency into curtailment thresholds and trigger events, both for transmission and capacity-related conditions, is essential to the successful implementation of non-firm transmission services. A large load must understand the categories of constraint that could result in a requirement to reduce system withdrawals. Without clarity on these parameters, customers cannot reasonably anticipate the limitations of a non-firm service and, in turn, cannot justify investment in the relevant controls, onsite storage, or other enabling technology to achieve load flexibility. 2. Curtailment parameters should recognize the flexibility of modern large loads to adjust withdrawals with granularity beyond a drop to a firm service level. Curtailment requirements limited to binary "on/off" interruption will understate available flexibility and will exclude the load response modes most beneficial to large load customers and most useful to the system operator. PCLR's modulation of load under the ERCOT framework according to real-time dispatch exemplifies this dynamic flexibility, in contrast to curtailment limited to binary emergency load shed.
1. Mount Storm Wind LLC	Clearway Energy Group ("Clearway") appreciates PJM's continued efforts to develop innovative solutions that improve the generator interconnection and load transmission planning processes. We're encouraged by PJM's stated ability to study interconnection clusters closer to one year, and we support the goal of a more efficient process for all stakeholders. At the same time, a shift to a single-phase, one-year generator interconnection process is a significant departure from the status quo. A change of this magnitude warrants serious, thoughtful consideration and a reasonable transition period. We recommend that PJM pursue a targeted solution for load requests that directly addresses FERC's Show Cause Order for the November filing, while establishing a separate, parallel track to discuss approaches to integrated interconnection and transmission planning, which can take place over a longer period to allow for a more robust discussion. 1. Certainty Must Accompany Increased Readiness Compressing the generator interconnection process to a single-phase, one-year study timeline, paired with significantly higher cost and risk, is by itself unworkable for new generation development. Projects move forward when the key drivers of development - permitting, engineering, financing, and interconnection – can be de-risked together, with spending levels that are commensurate with each stage of maturity. A one-year study timeline would require projects to enter the queue with substantially greater maturity (e.g. full site control and permitting, advanced engineering), which requires a significant increase in upfront capital spending. Investors will be reluctant to commit that capital at risk without interconnection cost or schedule certainty. A project cannot reasonably proceed at that stage if it doesn't know whether the cost of the interconnection is \$7 million or \$70 million, or whether it will take one year or five years to be fully deliverable. This could ultimately discourage new generation at precisely the time PJM needs more new capacity to come online, not less. Any new generation that does make it through the queue will be more expensive, carrying the price of this added risk premium. Ultimately, higher risk to developers should be paired with higher cost and schedule certainty. PJM should consider SPP's Consolidated Planning Process (CPP), which uses an upfront entry fee model to meet this need. Additionally, increased transparency, including access to study models and detail on new automation tools, will be critical to giving stakeholders confidence in study results. Achieving that balance will require carefully reworking both the interconnection study process and the broader planning framework - work that cannot be reasonably completed within a four-month window. 2. Focus on Speed to Power, not just Speed to Study Additionally, while accelerating the queue process is important, reforms should not end at execution of a GIA. PJM and transmission owners should also address persistent post-GIA delays, schedule uncertainty, and upgrade cost overruns, which continue to create substantial project risk and can undermine the benefits of an accelerated interconnection process. These challenges may become even more pronounced as large load requests entering the interconnection process trigger significant network upgrades, potentially extending timelines for the construction of contingent upgrades and increasing uncertainty for generation projects that depend on them. 3. Pursue Deeper Integration with Regional Planning Clearway supports and encourages PJM to further align, and ultimately integrate, interconnection and transmission studies with RTEP. We agree that studying load and generation together offers significant benefits. PJM's recent success in reducing costs by \$8.7 billion through proactive RTEP planning demonstrates that incorporating queue-driven transmission needs into a consolidated planning framework can identify more efficient long-term transmission solutions, lowering costs for load and generation alike. However, simply moving load transmission service requests into the interconnection queue is not the same thing as integrated planning, and does not deliver those same benefits. We encourage PJM to consider SPP's CPP as a model to strive towards. Ultimately, Clearway remains eager to continue the conversation on reforms to the generator interconnection process. We believe those reforms will be better planned and executed through the stakeholder process rather than as part of the FERC Show Cause Order on large loads, which is intended to address transmission service for large loads specifically. A natural venue to begin these broader discussions would be the Planning Committee or Interconnection Process Subcommittee.

Co-Located Load Order Workshop Stakeholder Feedback Poll	
Question 3	
Company Name	Based on the information provided at the July 30 Co-Located Load Order Workshop, what additional questions do you have?
1. Geenex Solar LLC	Aligning a 3-year in-service date (GIA goal) with longer term RTEP projects and potentially faster moving loads seems like a big challenge. What are the initial plans to align these three out-of-sync paths?
1. Electranet REP I, LLC	Regarding the new "flexible large loads," can onsite backup generators, permitted for non-emergency use, that is not co-located (i.e., not FTM, no intention to pursue CIRs yet) may be used specifically to enable a large load to be flexible without disqualifying that load from meeting the definition of "flexible large load"? Thank you.
1. Calvert Cliffs Nuclear Power Plant, LLC 2. Constellation NewEnergy, Inc. 3. Constellation Energy Generation, LLC 4. Handsome Lake Energy, LLC 5. Champion Energy Services, LLC 6. Champion Energy Marketing LLC 7. Champion Energy, LLC 8. Calpine Energy Services, L.P. 9. Calpine Energy Solutions, LLC 10. Calpine Mid Atlantic Marketing, LLC 11. North American Power and Gas, LLC 12. Calpine Bethlehem, LLC	No additional feedback
1. Dayton Power & Light Company (The)	-The potential for a pro forma cost recovery agreement between PJM, the TO and the Large Load Customer. Will it be prospective in PJM requirements? Will proforma be in alignment with emerging Ohio state law? - What happens in a default? - What/who is responsible for holding and establishing Credit/Collateral support requirement.
1. Camus Energy	How does PJM propose to recognize the unique characteristics of flexible large loads within a consolidated New Services Request Process? Does PJM propose to integrate requests for non-firm transmission service into the proposed consolidated New Services Request Process? How has PJM evaluated the alternative pathways for the study of coordinated generation and load described in paragraphs 97-98 of the Large Load Show Cause Order? Please elaborate on PJM-specific barriers to the evaluation of "proximate" generation and load that were described in general terms during the July 30 meeting. Do those barriers apply to non-firm transmission service? Has PJM evaluated ERCOT's PCLR framework, including to assess opportunities to enable similarly dynamic load flexibility in the implementation of new transmission services? What changes to the TO process for the study of large loads, including flexible large loads, does PJM anticipate will be necessary to comply with the Large Load Show Cause Order? Modern large loads, including data center loads, are capable of sophisticated modulation of withdrawals from the transmission system to support reliability. In evaluating curtailment for customers serving large loads under non-firm transmission service, how has PJM considered mechanisms for load reductions other than a "full curtailment"/"no curtailment" binary? What additional information would PJM require to consider a further accelerated pathway for flexible large loads that are able to respond both to system contingency events as well as to economic dispatch?
1. Mount Storm Wind LLC	- Will PJM be able to provide greater interconnection cost and schedule certainty under this proposal? If so, how? - Will PJM require different entry and readiness requirements between generation and load customers? - Can PJM share its progress in applying automation to the interconnection process through its partnership with Google and Tapestry? What key capabilities are being unlocked to hit a one-year timeline, and by when does PJM expect to achieve them? - How will PJM continue to keep models transparent and replicable for customers as automation is incorporated into the studies? - When is the earliest PJM anticipates having these changes effective? Would generation projects in the queue and load requests in RTEP be grandfathered under current process rules, or forced to transition into the new framework? - Does this concept replace the transmission owners' current role in load transmission studies, or add a new process alongside it?