PPL Large Load Show Cause Compliance Alternate Concept

8/28/2026

Key Concerns Addressed By This Proposal
Respects TO M3 rights to determine Supplemental Projects for load interconnections
Does not make load interconnections dependent on AI automation that is new and not yet time tested
Meets FERC Order without unnecessarily going beyond its requirements
Easier to implement (i.e. less change to status quo), with more manageable timelines
Retains a rolling Large Load study process similar to what is done today
Better coordination between Near-Term Planning and Long-Term Planning
Removes Reliability entirely from Long-Term Process, such that cost allocation will be simplified for 1920
Clearly identifies costs associated with large load both in the Near-Term and Long-Term to ensure costs can be allocated appropriately

1) **Near-Term RTEP Assessment**:

   a. Retain status quo generation cycle process.

   b. Add a quarterly Large Load Assessment process on the back end of the existing Generation Deactivations Study process.

   c. Utilize the 3-year out case to identify transmission solutions that ensure reliability for all generation deactivations. Include those upgrades in the study case.

   d. After completion of the TO load interconnection assessment process, the TO submits large loads and associated Supplemental Upgrade solutions to meet 3-year out TO Load Zone {including tie-lines} needs (all solutions up to 345 kV single-circuit lines and below and 500 kV line bifurcations and new 500 kV source substations as necessary to serve very large loads that put too much strain on the local transmission system) to PJM with required application fees and other required information such as ramp rates, TO/Customer contracts ensuring cost recovery, and site control data. The PJM Large Load Interconnection application window will be the same rolling 3-month cycle as the present Generation Deactivation application window.

   e. Large Load defined as load with a gross MW total of 50 MW or greater connected at a POI above 69 kV.

   f. Electrically Proximate Load (EPL) definition: cases where a Large Load is associated with generating facilities located at, or radially connected to, the same substation as the associated Large Load.

   g. Large Load not bundled with generation will be studied by the TO up to the 3-year out Large Load capacity level. Generation and Large Load that will be co-located or Electrically Proximate with one another will be studied by the TO up to the maximum MW level they are able to balance one another.

   h. Any generation above the maximum fully ramped Large Load capacity will be handled via the PJM New Generation Interconnection Process.

   i. After the Deactivations analysis in step (1c), include large loads and their respective Supplemental Upgrades (as provided by the TOs) in the same case and determine transmission solutions necessary to ensure regional system reliability for all large load interconnections in the quarterly cycle.

2) **Generation Cycle Process**:

   a. Feed Generation Deactivation Study case updates, and Large Load Assessment case updates (Large Loads and any associated generation set at capacity values noted in (1g)) into the subsequent Generation Cycle Phase (1, 2, or 3 as available).

3) **Mid-Term RTEP Assessment (Order 1000 Compliance Process, NERC TPL Standards)**:

   a. Annual cycle process.

   b. Feed Generation Deactivation Study case updates, and Large Load Assessment case updates (Large Loads at their 10-year out capacity value) into the subsequent RTEP Annual Reliability Mid-Term Process.

   c. Mid-Term study process will include an assessment with and without Large Load additions [(1) Base Case and (2) Base + Large Loads Case] such that Large Loads are studied in a separate case from the Base Case to allow for separate identification of Large Load reliability needs (summer peak, winter peak, and light load).

   d. Developers making proposals in the Mid-Term Reliability Window (3 to 4 months) would then have to identify which proposals address "Large Load Needs" so that PJM can then ensure any such selected proposals are noted as such in public posting with the large load cost allocations for any such projects.

4) **Long-Term RTEP Assessment (Order 1920 Compliance Process)**:

   a. Triennial cycle process.

   b. Primary goal to inform the Mid-Term RTEP Assessment.

   c. Focus on long-term (10 to 20 year) public policy goals and their impact on PJM footprint generation and load futures over the long-term. (Perhaps consider having both a 15-year and 20-year case, to illustrate progression from the Mid-Term needs to the Long-Term needs)

   d. Feed Generation Deactivation Study case updates, and Large Load Assessment case updates (Large Loads at their full capacity value) into the subsequent RTEP Triennial Reliability Long-Term Process.

   e. Transmission upgrades may be selected from the window by PJM with a formal Long-Term Transmission Upgrade Start Date (LTUSD) identified (date after which the selected Developer may formally begin executing the project and the project may no longer be cancelled).

   f. Until the LTUSD, any solutions selected from a Long-Term RTEP Assessment Window are subject to cancellation if it is later determined that the needs the project was selected to resolve no longer exist or have changed in such a way that the Problem Statement needs to be revisited and reissued for consideration in a subsequent Long-Term RTEP Assessment window.

   g. All Post-LTUSD projects from the Long-Term RTEP Assessment become “certified” projects and get included in the Base Case for Mid-Term RTEP Assessments (i.e. all cases noted in step (3c) above will include them).

h. Mid-Term RTEP Assessments will be completed with and without the Long-Term RTEP Assessment Pre-LTUSD Transmission Portfolio (i.e. the two sets of cases noted in (3c) above would be studied with and without the Pre-LTUSD Transmission Portfolio, thereby informing PJM of what reliability concerns from the Mid-Term RTEP Assessment will already be addressed by the Long-Term Transmission Portfolio that is not yet certified. This would give PJM the opportunity to formally accelerate LTUSDs if necessary to meet reliability needs in the Mid-Term RTEP Assessment and agreed to by the project Developer, in lieu of including the subject reliability violations in the Mid-Term RTEP Assessment window).

    1. However, in the case of years during which both Long-Term and Mid-Term Assessments occur, if the original reliability concerns that drove the need for the Long-Term Transmission Upgrade are determined to no longer exist during the Long-Term RTEP Assessment (i.e. the project in question is then essentially pending cancellation), the project could not be repurposed to meet Mid-Term RTEP Assessment needs without submission into the Mid-Term RTEP Assessment window. In this unique circumstance, the original Developer would retain rights to the project, and PJM could offer the Developer an "express submission" opportunity where the Developer would submit the solution as-is into the Mid-Term RTEP Assessment window (without having to meet all the standard application requirements, only updating the cost estimate). If the Developer wishes to modify the project scope in any way to ensure efficiencies with the new Problem Statement, a separate new proposal would be required that meets all standard proposal submission requirements (the Developer could still take advantage of the express submission proposal opportunity for the project as originally scoped as well).

i. The 20-Year Long-Term Assessment is to be done utilizing numerous futures that consider differences in load (including Large Loads) and generation that may be caused by changes in public policy and/or economics over the longer-term outlook in the various states in the PJM footprint.

j. One year Assumptions determination phase for PJM, TOs, States and other stakeholders to settle on appropriate range of Futures to be studied.

k. Long-Term Reliability Window (6 to 7 months) utilized to solicit transmission solutions to 20-year future needs of the PJM EHV Transmission System (only needs that PJM Planning believes will require transmission solutions at or above 345 kV DCT).

l. *Optional Feature*: Consider adding a tie back to the Generation Cycle process similar to the SPP CPP where the 20-Year plan is utilized to determine cost allocation for Network Upgrades for generators in the New Generation Cycle process that select POI locations that are "Reliability Secured" in the "Certified 20-Year plan" (i.e. the entire Long-Term Transmission Portfolio that has already met its LTUSD), and any generation that proposes to interconnect at unblessed POI locations would have to pay Network Upgrade costs on their own. If this optional feature is pursued, cost allocation will have to include generation customer cost break out in both Mid-Term and Long-Term Assessments during the SBDFAX process.

Date	New Generation Interconnection Process		Near-Term RTEP Assessment (3-Year Case Note 1)		Mid-Term RTEP Assessment Note 2 (Annual Order 1000 10-Year Reliability Study Process)	Long-Term RTEP Assessment (Triennial Order 1920 20-Year Long-Term Public Policy Process)
	Cycle 1	Cycle 2	Application Window Note 3	Near-Term Assessment		
Apr-26	Application Submission		2026 Q3 Deactivation Study Notice and Large Load Submission Acceptance Period	2026 Q2 Deactivation Study (C1-P1)		
May-26	Application Review	Application Submission				
Jun-26				2026 Q2 Large Load Assessment (C1-P1)		
Jul-26			2026 Q4 Deactivation Study Notice and Large Load Submission Acceptance Period	2026 Q3 Deactivation Study (C1-P1)	**2026 RTEP Reliability Window**	
Aug-26						
Sep-26				2026 Q3 Large Load Assessment (C1-P1)		
Oct-26	Phase 1		2027 Q1 Deactivation Study Notice and Large Load Submission Acceptance Period	2026 Q4 Deactivation Study (C1-P2)		
Nov-26					**2026 RTEP Solution Selection**	
Dec-26				2026 Q4 Large Load Assessment (C1-P2)	**2027 Load Forecast Finalization**	
Jan-27			2027 Q2 Deactivation Study Notice and Large Load Submission Acceptance Period	2027 Q1 Deactivation Study (C1-P2)	**2027 10-Year Case Build**	**Long-Term Futures Determination** **Stakeholder Process to Discuss Assumptions** **Capacity Expansion Studies (If Necessary)**
Feb-27	Decision Point 1				**2027 RTEP Preliminary 10-Year Case Release**	
Mar-27	Phase 2			2027 Q1 Large Load Assessment (C1-P2)		
Apr-27			2027 Q3 Deactivation Study Notice and Large Load Submission Acceptance Period	2027 Q2 Deactivation Study (C1-P3)	**2027 RTEP Final 10-Year Case Lockdown**	
May-27						
Jun-27				2027 Q2 Large Load Assessment (C1-P3)	**2027 RTEP Reliability Window** **(Includes all Large Loads through 2027 Q1 Assessment assuming capacity values for year 2037)**	
Jul-27			2027 Q4 Deactivation Study Notice and Large Load Submission Acceptance Period	2027 Q3 Deactivation Study (C1-P3)		
Aug-27						
Sep-27	Decision Point 2	Application Review		2027 Q3 Large Load Assessment (C1-P3)		
Oct-27	Phase 3		2028 Q1 Deactivation Study Notice and Large Load Submission Acceptance Period	2027 Q4 Deactivation Study (C2-P1)	**2027 RTEP Solution Selection**	**2028 Load Forecast Finalization and 2028 20-Year Case Build**
Nov-27						
Dec-27				2027 Q4 Large Load Assessment (C2-P1)	**2028 Load Forecast Finalization**	
Jan-28		Phase 1	2028 Q2 Deactivation Study Notice and Large Load Submission Acceptance Period	2028 Q1 Deactivation Study (C2-P2)	**2028 10-Year Case Build**	
Feb-28					**2028 RTEP Preliminary 10-Year Case Release**	**2028 RTEP Preliminary 20-Year Case Release**
Mar-28				2028 Q1 Large Load Assessment (C2-P2)		
Apr-28	Decision Point 3 & Final Agreement	Decision Point 1	2028 Q3 Deactivation Study Notice and Large Load Submission Acceptance Period	2028 Q2 Deactivation Study (C2-P3)	**2028 RTEP Final 10-Year Case Lockdown**	**2028 RTEP Final 20-Year Case Lockdown**
May-28	Final Agreement	Phase 2				
Jun-28				2028 Q2 Large Load Assessment (C2-P3)	**2028 RTEP Reliability Window** **(Includes all Large Loads through 2028 Q1 Assessment assuming capacity values for year 2038)**	**2028 RTEP Long-Term Assessment Window** **(Includes all Large Loads through 2028 Q1 Assessment assuming capacity values for year 2048)**
Jul-28			2028 Q4 Deactivation Study Notice and Large Load Submission Acceptance Period	2028 Q3 Deactivation Study (C2-P3)		
Aug-28						
Sep-28				2028 Q3 Large Load Assessment (C2-P3)		
Oct-28			2029 Q1 Deactivation Study Notice and Large Load Submission Acceptance Period	2028 Q4 Deactivation Study (C2-P3)	**2028 RTEP Solution Selection**	
Nov-28		Decision Point 2				
Dec-28		Phase 3		2028 Q4 Large Load Assessment (C2-P3)	**2029 Load Forecast Finalization**	
Jan-29			2029 Q2 Deactivation Study Notice and Large Load Submission Acceptance Period	2029 Q1 Deactivation Study (C3-P1)	**2029 10-Year Case Build**	
Feb-29					**2029 RTEP Preliminary 10-Year Case Release**	
Mar-29				2029 Q1 Large Load Assessment (C3-P1)		
Apr-29			2029 Q3 Deactivation Study Notice and Large Load Submission Acceptance Period	2029 Q2 Deactivation Study (C3-P2)	**2029 RTEP Final 10-Year Case Lockdown**	
May-29						
Jun-29		Decision Point 3 & Final Agreement		2029 Q2 Large Load Assessment (C3-P2)	**2029 RTEP Reliability Window** **(Includes all Large Loads through 2029 Q1 Assessment assuming capacity values for year 2039)**	
Jul-29		Final Agreement	2029 Q4 Deactivation Study Notice and Large Load Submission Acceptance Period	2029 Q3 Deactivation Study (C3-P2)		
Aug-29						
Sep-29				2029 Q3 Large Load Assessment (C3-P2)		
Oct-29			2030 Q1 Deactivation Study Notice and Large Load Submission Acceptance Period	2029 Q4 Deactivation Study (C3-P3)		
Nov-29						
Dec-29				2029 Q4 Large Load Assessment (C1-P3)		

Note 1: Large Load customer capacity for the Near-Term Assessment set to the expected load level for the 3rd year

Note 2: Large loads studied in a separate case from Base Case to allow separate identification of Large Load reliability needs. Developers making proposals would then have to identify which proposals address "Large Load Needs" so that PJM can then ensure any such selected proposals are noted as such in public posting with large load cost allocations for any such projects. Large Load capacity values for the Mid-Term Assessment set to the expected load level for the mid-term study year

Note 3: After completion of the TO load interconnection assessment process, the TO submits large loads and associated Supplemental Upgrade solutions to meet 3-year out TO Load Zone (including tie-lines) needs (all solutions up to 345 kV single-circuit lines and below and 500 kV line bifurcations and new 500 kV source substations as necessary to serve very large loads that put too much strain on the local transmission system) to PJM with required application fees and other required information such as ramp rates, TO/Customer contracts ensuring cost recovery, and site control data. Large Loads defined as loads with gross MW total of 50 MW or greater connected at a POI with a voltage class above 69 kV. Generation and Large Load that will be co-located or Electrically Proximate with one another will be studied by the TO up to the -3-year out-Large Load capacity level. Any generation above the maximum fully ramped Large Load capacity will be handled via the PJM New Generation Interconnection Process

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Meets FERC Order without unnecessarily going beyond its requirements
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UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Interconnection of Large Loads to the Interstate Transmission System	))	Docket No. RM26-4-000

SUPPLEMENTAL COMMENTS OF CONSTELLATION ENERGY GENERATION, LLC

Constellation submits these supplemental comments to outline a new, reliable, speed-to-service option pairing *new* generation with large loads at *existing* power plant sites of at least the same size,[1] and to urge this option's inclusion in the Commission's next steps on the Advanced Notice of Proposed Rulemaking.[2] This proposal achieves Secretary Wright's objective "to ensure efficient, timely, and non-discriminatory [large] load interconnections"[3] by adding paired new generation and load *without changing injection rights or creating withdrawal rights* at existing generation sites. This new generator/load configuration will speed up the ability for new generation to come online by avoiding net injections or withdrawals of power at the existing Point of Interconnection outside the scenarios that have already been studied and found to be reliable at the existing generator's interconnection.[4] Appropriate system protection equipment will be in place to make certain this condition is met, ensuring that there are no negative reliability implications for other customers or the grid.

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[1] *See Load-Contingent New Capacity at Existing Plants (LCEP) – A Speed to Power Pathway*, Constellation Energy Generation LLC ("Constellation LCEP Presentation"), Att. A hereto.

[2] Advanced Notice of Proposed Rulemaking, Docket No. RM26-4 (Oct. 27, 2025) ("ANOPR").

[3] Letter from Chris Wright, Sec'y, U.S. Dep't of Energy to FERC Commissioners, at 2 (Oct. 23, 2025) ("Secretary's Letter").

[4] Under ANOPR Principle 5, there would be no change to "the amount of injection and/or withdrawal rights requested" from those already governing the existing interconnection. ANOPR at ¶ 22.

This new service for "Load-Contingent New Capacity at Existing Plants" ("LCEP") is conceptually aligned with "Surplus Interconnection Service"[5] and, like that service, is principally intended "to realize the benefits of an efficiently-used transmission system."[6] LCEP Service will allow an expedited interconnection process for paired new generation and load combinations at existing generation sites similar to the process currently utilized for Surplus Interconnection Service.[7] Just as Surplus Interconnection Service is not a replacement for Interconnection Service,[8] LCEP Service is also not a replacement for Interconnection Service, but rather is a faster option for critical new infrastructure. LCEP Service can be maintained for an extended period or the LCEP generation resource can seek energy injection rights or be transitioned to a standard capacity resource once the appropriate pre-conditions are satisfied. The benefit of LCEP Service is that it will help achieve the Secretary's goals of adding both new generation and load on the system quickly without affecting the integrity of the existing network as previously studied and maintained.

Any final rule on the ANOPR must find that existing tariffs are unjust and unreasonable because they fail to meet "unprecedented current and expected growth of large loads seeking to interconnect to the transmission system" and find that new "standardize[d] interconnection procedures and agreements for such loads, *including those seeking to share a point of interconnection with new or existing generation facilities* (hybrid facilities)" are required.[9] This

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[5] Capitalized terms not otherwise defined herein shall have the definitions provided to them in the *pro forma* LGIP.

[6] *Reform of Generator Interconnection Procedures & Agreements*, Order No. 845, 163 FERC ¶ 61,043, at P 483 (2018) ("Order No. 845").

[7] *See id.* PP 486-88.

[8] *See id.* P 482 (Surplus Interconnection Service "does not restrict a new interconnection customer's ability to submit an interconnection request for any requested point of interconnection directly with the transmission provider").

[9] ANOPR at ¶ 12 (emphasis added).

FPA section 206 prong one showing[10] includes record evidence in this proceeding that the current rules underutilize existing infrastructure,[11] including by failing to accommodate the pairing of new generator/load combinations at existing generators' Points of Interconnection when the combination will create no new thermal power flow conditions that have not already been studied and will result in no net injections onto the system. The record here supports findings similar to those in Order No. 2023 that existing rules "are insufficient to ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner."[12] The Wall Street Journal this week reported that a "JP Morgan analysis last month found that more than 60% of data-center capacity planned for completion in 2027 isn't yet under construction, and another 7% is delayed,"[13] pointing to delays in accessing power as the primary culprit.

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[10] Under prong one of the analysis under section 206 of the Federal Power Act ("FPA"), the Commission must establish by a preponderance of evidence that the LGIP "is unjust, unreasonable, unduly discriminatory, or preferential." 16 U.S.C. § 824e(a)-(b).

[11] *See, e.g.*, Reply Comments of Verrus at 2 (Dec. 5, 2025) ("Existing rules generally fail to distinguish between loads that strain the grid and loads that possess the physical capability to support it. By treating these fundamentally different asset classes identically, the current framework forces flexible loads to cross-subsidize inflexible ones, requiring customers who can operationally avoid the need for network upgrades to pay for infrastructure that is only necessary for their inflexible peers. Furthermore, it forces these agile resources to wait in queues behind projects requiring years of costly upgrades, rather than allowing them to connect quickly by leveraging the underutilized non-peak grid capacity already in place."); Reply Comments of Vistra Corp. at 2 (Dec. 5, 2025) ("To win the AI race, the United States needs to maximize the use of the infrastructure that we already have, in the short term, while building out a more robust electric grid in the medium-to-long term."); Reply Comments of Google LLC at 5 (Dec. 5, 2025) ("To ensure our national competitiveness, the United States must focus on expediting the development and interconnection of large loads, including data centers, that maximize the use of existing transmission infrastructure and minimize strain on the grid."); Reply Comments of GridCARE at 2 (Dec. 5, 2025) ("Interconnecting large AI loads through existing infrastructure—where operationally feasible—can reduce systemwide costs by improving asset utilization, increasing utility revenues without imposing new costs on existing customers, and supporting future capital investments."); Comments of Public Interest Organizations at 6-7 (Nov. 21, 2025) ("Connecting load centers to regions with excess supply power can reduce costs and avoid redundant infrastructure by allowing regions to share their generating resources."); Joint Comments of the Distributed Capacity Parties at 6 (Nov. 21, 2025) ("Similarly, siting a new large load while considering the location of installed but underutilized grid resources and proposed aggregations of the same can save on network upgrades.").

[12] *Improvements to Generator Interconnection Procedures &* Agreements, Order No. 2023, 184 FERC ¶ 61,054, at P 37 (2023) ("Order No. 2023").

[13] Katherine Blunt, *America's Data Center Build-Out Is Falling Way Behind Schedule*, WALL ST. J. (June 2, 2026).

The Commission should include consideration of LCEP Service as a key part of its proposed replacement rate under any action taken in response to the ANOPR. LCEP Service is one of the simplest and most efficient ways to achieve speed-to-service without jeopardizing reliability or increasing costs to other customers. It also fits "squarely" within the Commission's jurisdictional authority since service at the existing Point of Interconnection with the Transmission System is the issue under consideration.[14]

In addition to being a just and reasonable part of any replacement rate, LCEP Service also is fully responsive to the ANOPR's directives and principles, including to study load together with Generating Facilities, given "siting a large load near or at the same point of interconnection as a new generating facility could reduce the network upgrades needed to interconnect only the load or only the generating facility" (Third Principle), and incentivizing co-location which can "ensure[] efficient buildout of the transmission system" (Fifth Principle).[15] The Commission has also looked favorably on novel generator/load connection arrangements recently.[16] Accordingly, the Commission should include an LCEP Service option in its next steps on the ANOPR.

COMMENTS

Just months ago, in furtherance of the ANOPR, the Commission declared "there is an urgent need for thoughtful reforms to ensure that large loads are 'able to connect to the transmission system in a timely, orderly, and non-discriminatory manner.'"[17] The Commission

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[14] Secretary Letter at 1; *see also* ANOPR at ¶ 18 (Principle One is that "the Commission's jurisdiction should be limited to interconnections directly to transmission facilities, consistent with the Commission's seven-factor test").

[15] *See id.* at ¶¶ 20, 22.

[16] *See, e.g.*, *Sw. Power Pool, Inc.*, 194 FERC ¶ 61,192 (2026) (establishing a Consolidated Planning Process framework to streamline SPP's regional transmission planning and generator interconnection processes.).

[17] *Interconnection of Large Loads to the Interstate Transmission System*, 195 FERC ¶ 61,045, at P 2 (2026) ("Order Regarding Intent to Act").

also announced it will "address" the problems identified by the ANOPR "in a manner that is quick, efficient, and legally durable" and called upon stakeholders to help achieve this goal.[18] In support of this goal, Constellation developed the LCEP proposal. It is rooted in ANOPR Principles 3 and 5,[19] which discuss the benefits of studying new generation and load pairings[20] together based on the exact rights that they are seeking from the Transmission Provider.

New generation and load pairings have unique technical and operational characteristics and impacts depending on where those pairings are located. When located at a new Point of Interconnection to the grid, they can be delayed by long lead times for system reinforcements resolving thermal violations identified during interconnection studies. By contrast, when those pairings are sited at an existing generator's Point of Interconnection and fall within the study parameters reflected by that existing generator's interconnection, they benefit from the studies and upgrades already completed for that existing generator and can come on-line more rapidly without jeopardizing reliability.[21] While the new LCEP Service interconnection process would still conduct all studies necessary to ensure reliability, the evaluation of new generation-load pairings at existing generation, falling within parameters that already have been studied, will speed their interconnection.

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[18] *Id.* P 4.

[19] ANOPR at ¶ 20 (Principle 3 stating "load and hybrid facilities should be studied together with generating facilities"); *id.* at ¶ 22 (Principle 5 stating "hybrid facilities should be studied based on the amount of injection and/or withdrawal rights requested").

[20] *Id.* at ¶ 20 ("siting a large load near or at the same point of interconnection as a new generating facility could reduce the network upgrades needed to interconnect only the load or only the generating facility"); *id.* at ¶ 22 ("This provides incentives for co-location with new generation facilities and ensures efficient buildout of the transmission system.").

[21] *See* Constellation LCEP Presentation at 3-4.

As discussed in the ANOPR, and in the Commission's landmark Order No. 845 and Order No. 2023,[22] the Commission can address persistent and worsening interconnection backlogs by "standardiz[ing] interconnection procedures and agreements for such loads, including those seeking to share a point of interconnection with new or existing generation facilities."[23] One pathway for doing so is to revise the *pro forma* Large Generator Interconnection Procedures ("LGIP") to allow new generation and load pairings to leverage an existing generator's Point of Interconnection. We call this option Load-Contingent New Capacity at Existing Plants or the "LCEP Service." It is load-contingent because, without the pairing with new load at the same Point of Interconnection, the new generator would not fall within the parameters that already have been studied.

Similar to Surplus Interconnection Service,[24] the Commission can establish the LCEP Service using its powers under section 206 of the FPA to revise the *pro forma* LGIP to require Transmission Providers to provide a LCEP Service process. While the LCEP Service is not capitalizing on unused headroom at the Point of Interconnection in the same way as Surplus Interconnection, it is similar to Surplus Interconnection Service in that any net injections or withdrawals from the grid are within the scope of those scenarios that have already been studied and planned for.

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[22] Order No. 845, 163 FERC ¶ 61,043 at P 37 (finding "the current interconnection process may hinder timely development of new generation, stifle competition, result in uncertainty and inaccurate information, or potentially unduly discriminate against new technologies") (citations omitted); Order No. 2023, 184 FERC ¶ 61,054 at P 37 (concluding "pursuant to FPA section 206, … that certain revisions to the *pro forma* open access transmission tariff and the Commission's regulations are necessary to ensure rates that are just, reasonable, and not unduly discriminatory or preferential.")

[23] ANOPR at ¶ 12.

[24] Order No. 845, 163 FERC ¶ 61,043 at PP 453-509.

I. The Existing pro forma LGIP are Unjust and Unreasonable and Unduly Discriminatory Because They Fail to Accommodate Paired New Generation and Load at Existing Generation Sites

Any proposed rulemaking is grounded in the Commission's Federal Power Act section 206 authority. First, the Commission must establish by a preponderance of evidence that the existing rules are "unjust, unreasonable, unduly discriminatory, or preferential."[25]

There is overwhelming record evidence in this proceeding that the current rules underutilize existing infrastructure[26] and result in years-long delays to serve large new loads.[27] The

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[25] 16 U.S.C. § 824e(a)-(b).

[26] *See supra* at 3, n.11 (citing record support).

[27] *See, e.g.*, Michael Kormos, The Co-Located Load Solution, Docket No. AD24-11-000, at 2 (Nov. 4, 2024) ("The standard utility models are struggling to accommodate large data center projects on a workable timeline, and can take five years or longer."); Intersect Power, LLC Comments, Docket No. AD24-11-000 (Dec. 9, 2024), at 2 ("Large loads face backlogs and multi-year delays, similar to those faced by generating resources in standard interconnection processes. Large loads cannot wait years for power supply arrangements, or they risk losing business to their competition, including overseas competition.") (citing Todd Shatzki, Joseph Cavicchi, Megan Accordino, CoLocated Load: Market, Economic, and Ratemaking Implications, Analysis Group, at 14 (Oct. 28, 2024) ("CoLocated Load"), https://www.analysisgroup.com/globalassets/insights/publishing/2024_co_located_load_market_economic_and_ratemaking_implications.pdf); Co-Located Load at 12 ("Several utilities have reported that the expected wait time for connecting new large loads is as long as 7 to 10 years. AEP Ohio has responded to the influx of requests by suspending acceptance of new load service agreements from data center customers, to give the utility time to study the potential impacts of the proposed additions on its transmission and distribution systems."); *id.* at 12 n.43 ("Grant PUD estimates a wait time of 7-10 years. Dominion Energy expects the time it takes to connect large data centers to the electric grid to increase by one to three years amid a surge in requests, bringing the total wait time to as long as seven years…. AEP Ohio has stated that, because Central Ohio lacks RTO-controlled generation, serving new data center load will require investment in extra high voltage transmission to import power from other parts of the grid. That investment, AEP says, could take 7-10 years to plan, design, site, and construct."); *see also* Joint Electricity Customer Alliance Comments, Docket No. AD24-11-000 (Oct. 30, 2024), at 1 ("When properly executed, co-location aims to reduce overall costs, not shift them. It is a rational response given the slow pace of transmission and generation development across the grid, driven by interconnection delays, for both load and generation, and poor regional transmission planning."); Mainspring Energy, Inc. Comments, Docket No. EL25-20-000, et al. (April 23, 2025), at Attachment at 2 ("New load interconnection also faces significant delays. Some data center customers report that they're being given 3-5 year estimates for grid delivery of data center power. For a 100 MW data center, assuming US$150,000/MW of revenue per month (~US$150/month/kW), three years of delay translates to over US$500M in lost revenue."); Dr. Paul Stockton, et al. Letter from National Security Experts, Docket No. EL25-20-000, et al. (Apr. 22, 2025) at 1 ("In some states, including those in the Eastern US served by PJM Interconnection, L.L.C., data centers seeking to connect and take service from the grid may face delays of seven to ten years before they can receive power. Those delays are unconscionable, given the DOD's rapidly growing requirements for AI services and the imperative to counter China's drive for AI primacy."); Constellation Answer, Docket No. EL25-20-000, et al. (Apr. 23, 2025), Exh. 1 at 9 n.38 (Declaration of Dr. Paul Stockton); "AI, data center electricity demand could drive advanced nuclear investment: NERC head Jim Robb," Utility Dive (June 6, 2024) ("it takes me about

record here supports findings similar to those in Order No. 2023 that existing rules "are insufficient to ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner."[28] Constellation's analysis identified one particular lost opportunity: the current rules do not clearly accommodate the pairing of new generator/load combinations at existing generator's Points of Interconnection that create no new thermal power flow conditions which have not already been studied. It is unjust and unreasonable not to fully utilize existing infrastructure and proven reliability paths while new load waits for service.

The adoption of Surplus Interconnection Service in Order No. 845 supports finding the *pro forma* LGIP unjust and unreasonable. In Order No. 845, the Commission found that "where proper precautions are taken to ensure system reliability, it would be unjust and unreasonable to deny an original interconnection customer the ability either to transfer or use for another resource surplus interconnection service."[29] This finding rested on the principle that where interconnection capacity has already been studied and approved, and where the use of that capacity by an additional resource would not increase the total Interconnection Service at the Point of Interconnection or require new network upgrades, there is no just or reasonable basis for denying access to that capacity. The same principle applies here. Where additional load, paired with new generation, can be served at an

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four years to build a substation," according to David Schleicher, Northern Virginia Electric Cooperative CEO), https://www.utilitydive.com/news/ai-datacenter-electricity-demand-advanced-nuclearinvestment-Robb/718181/; "Elk Grove Mayor Meets With ComEd on Substations for Data Centers," Journal & Topics (Mar. 14, 2024) (Mayor of Elk Grove, Illinois, "expressed frustration with ComEd, saying the electricity utility was 'dragging their feet' in building substations to support the growing data center industry"), https://www.journal-topics.com/articles/elk-grove-mayor-meets-with-comed-on-substations-for-data-centers/); Statement of Cole Muller, Executive Vice President of Strategic Ventures Talen Energy Corporation, Docket No. AD24-11, at 2 (Oct. 16, 2024) ("Co-locating data center load with generation allows the load to be served efficiently and economically. The alternative in many cases is years-long delays to connect in front of the meter, i.e., directly to the grid.").

[28] Order No. 2023, 184 FERC ¶ 61,054 at P 37.

[29] Order No. 845, 163 FERC ¶ 61,043 at P 471.

existing Point of Interconnection within the already studied parameters, it is unjust and unreasonable that the existing *pro forma* LGIP does not provide a pathway to do so.

II. The Commission Should Adopt LCEP or Include it as One of the Proposed Replacement Rates

Once the Commission establishes that the existing rate, in this case the *pro forma* LGIP, "is unjust, unreasonable, unduly discriminatory, or preferential," it must fix a replacement rate that is just and reasonable and not unduly discriminatory or preferential.[30] The Commission's discretion is at its "zenith" when fashioning remedies.[31] As a replacement rate, the Commission should revise the *pro forma* LGIP to require Transmission Providers to establish a process for LCEP Service at an existing generator's Point of Interconnection.

A. LCEP Service is Just and Reasonable and Consistent with Commission Precedent

LCEP Service as outlined here and in Attachment A is just and reasonable and not unduly discriminatory or preferential. Like Surplus Interconnection Service, LCEP Service is an expedited interconnection process outside of the standard interconnection queue for new generation paired with new load at sites with existing generation facilities that have already been studied. By leveraging the studies that already have been performed to speed interconnection, the LCEP Service would "improve access to the transmission system," and "reduce costs…by increasing the utilization of existing interconnection facilities and network upgrades rather than requiring new ones."[32] The LCEP Proposal is animated by and can achieve the goal of speed to power for large

[30] 16 U.S.C. § 824e(b); *see also Emera Maine v. FERC*, 854 F.3d 9, 20-27 (D.C. Cir. 2017).

[31] *XO Energy Ma, LP v. FERC*, 77 F.4th 710, 716 (D.C. Cir. 2023).

[32] Order No. 845, 163 FERC ¶ 61,043 at P 467.

load projects stymied today by extremely long interconnection timelines.[33] The LCEP Proposal also facilitates bringing new generation online to service new large loads as quickly as possible.

The arrangements that would qualify for LCEP Service would be limited: *First*, LCEP Service arrangements must be sited "at the same" Point of Interconnection as an existing generation resource.[34] *Second*, the "new load would be sized less than or equal to" a single existing generator at the applicable Point of Interconnection.[35] *Third*, the new generation must be "commensurate with the new load" and "deliverable" only to the new load with which it is paired—no net injections onto the grid beyond the existing generator's rights would be allowed.[36] The new generation would in essence become a "new category of generation resource" that could not be used to offset the capacity obligation of any load other than the paired load.[37] The new generator would offer into the energy market up to the level of the paired load.

Because LCEP Service arrangements would not increase the existing generator's Interconnection Service at the Point of Interconnection, LCEP Service arrangements would leverage the existing power system and power system studies to improve the efficiency of processing interconnection requests for both Transmission Providers and Interconnection Customers. The new generation and new load components of LCEP Service would create system conditions that fall within the N-1 or G-1 thermal power flow scenarios (loss of a single generator) already studied for the existing generation resource. For that reason, the studies for LCEP resource

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[33] Order Regarding Intent to Act, 195 FERC ¶ 61,045 at P 2 (agreeing that "'[i]n light of the unprecedented current and expected growth of large loads' such as data centers, there is an urgent need for thoughtful reforms to ensure that large loads are 'able to connect to the transmission system in a timely, orderly, and non-discriminatory manner.'") (citing Secretary's Letter at 1).

[34] Constellation LCEP Presentation at 5.

[35] *Id.*

[36] *Id.*

[37] *Id.*

arrangements would largely confirm that base (or normal) and contingency thermal power flow conditions have been studied and planned for at the existing generator's Point of Interconnection.[38] The restrictions on the generation and load components of LCEP Service mainly address the possibility of thermal overloads, which are a large cause of network upgrades, although all studies that the Transmission Provider deems appropriate to protect reliability should be conducted. Similar to Surplus Interconnection Service requests, these limited LCEP Service arrangements could be processed on an expedited basis by the Transmission Provider, outside the normal interconnection queues.[39]

In addition, the process for LCEP Service would maintain system reliability. Studies would be performed to ensure that all required reliability conditions are evaluated. But we already know that the system is designed to meet the planned—and unchanged—injections and withdrawals at the existing generator's point of interconnection from a thermal power flow perspective. Based on those studies, system protection requirements can be put in place to ensure there will be no net injections as is done in normal course.[40] While the current study processes for some Transmission Providers (such as PJM) do not plan for load outages, if load outage studies are required, the operational conditions applicable to LCEP Service would address any reliability concerns. Specifically, one of the key operational terms applicable to LCEP Service is that mechanisms

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[38] *Id.* ("The LCEP proposal would create no new thermal power flow study conditions that haven't already been studied and planned for at the existing generator POI."). *See also, e.g., pro forma* LGIP § 3.3.1 (related to Surplus Interconnection Service).

[39] Order No. 845, 163 FERC ¶ 61,043 at PP 486-488.

[40] *See* Reply Brief of Constellation Energy Generation, LLC at 16 (Apr. 24, 2026) ("Constellation Reply Brief") ("PJM only requires [special protection systems] when 'appropriate,' that is, when studies identify 'actual overloads and conditions that could cause cascading failures that PJM cannot mitigate through normal operations.'") (quoting PJM Manual 14B at 116 and Reply Brief, Exhibit 1, ¶ 5 (Affidavit of Michael Kormos)).

similar to those used in surplus or hybrid interconnection would apply to the circumstance when load reduces or drops.

LCEP Service could also be used by a generator/load combination as a transitional service that would expedite their interconnection while the generation is being studied as either an energy-only resource or as standard capacity resource. Once any necessary upgrades have been constructed to make the generation deliverable as an energy and/or capacity resource, the new generation would be allowed to participate in the markets in accordance with that status. In fact, a transitional mechanism may be preferable for many, just as many Co-Located Loads may seek Interim Network Integration Transmission Service ("NITS") while waiting for standard NITS.[41] As a practical matter, LCEP Service cannot be indefinite. Like Surplus Interconnection Service, an LCEP Service arrangement is inherently derived from the original existing generator's Interconnection Service.[42] Once the existing generator retires or permanently ceases commercial operation, so too would the associated LCEP Service arrangement.[43]

To effectuate LCEP Service, the Commission can define LCEP Service in the *pro forma* LGIP as an Interconnection Service available for new generation and load pairings (1) sited at the same Point of Interconnection as an existing generation resource, (2) where the maximum output to the grid of existing and new generation is unchanged, (3) the size of the load does not exceed that of a single existing generator at the Point of Interconnection, and (4) the new generation is sized commensurate with the new load with which it is paired. The Commission can also model

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[41] *See generally PJM Interconnection, L.L.C.*, 193 FERC ¶ 61,217 (2025) ("PJM Co-Location Order").

[42] Order No. 845, 163 FERC ¶ 61,043 at P 474.

[43] *Id.* ("Because surplus interconnection service is inherently derived from an original interconnection customer's interconnection service under its LGIA, retirement and permanent cessation of commercial operation of the original interconnection customer's generating facility would eliminate any potential surplus interconnection service that might otherwise have been available.").

the *pro forma* LGIP language specifying the LCEP Service after its Surplus Interconnection requirements.[44] The Commission should specify that requests for LCEP Service can be made by the existing Generating Facility, or one of its affiliates, or by an unaffiliated Interconnection Customer for the new generation and load pairing with the explicit consent of the existing Generating Facility.[45] The Commission should also require Transmission Providers to clearly identify the studies for evaluating LCEP Service requests.[46] Clear and transparent rules on the studies performed by Transmission Providers are critical to prevent delay. All such study processes must be tailored to accommodate speed to service or the efficiencies of siting at Points of Interconnection *already proven to be reliable* will be lost. The point of this new service is not to avoid charges for transmission service, but to minimize delay in bringing new generation online to serve new large load.

B. Accommodating LCEP Service Arrangements is "Squarely" Within the Commission's Authority

The Commission has the authority to accommodate LCEP Service arrangements. LCEP Service involves using existing interconnection facilities and network upgrades. "[I]nterconnection is part and parcel of transmission of electric energy in interstate commerce, and thus interconnection service is part and parcel of jurisdictional transmission service."[47] The fact that LCEP Service arrangements would pair new generation with load at the Point of

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[44] *See, e.g.*, *id.* P 467; *pro forma* LGIP § 3.3.

[45] *See, e.g.*, *pro forma* LGIP § 3.3.1 ("Surplus Interconnection Service requests may be made by the existing Interconnection Customer or one of its affiliates or may be submitted once Interconnection Customer has executed the LGIA or requested that the LGIA be filed unexecuted. Surplus Interconnection Service requests also may be made by another Interconnection Customer.").

[46] *See, e.g.*, *id.* ("Studies for Surplus Interconnection Service shall consist of reactive power, short circuit/fault duty, stability analyses, and any other appropriate studies. Steady-state (thermal/voltage) analyses may be performed as necessary to ensure that all required reliability conditions are studied.").

[47] *Pac. Gas & Elec. Co.*, 115 FERC ¶ 61,193, at P 36 (2006).

Interconnection with the Transmission System does not cause the Commission to lose its jurisdiction over the interconnection. Because the existing generator's Point of Interconnection is FERC-jurisdictional, so too must be the load's.

CONCLUSION

WHEREFORE, Constellation respectfully requests that the Commission include an LCEP Service option in its next steps on the ANOPR.

Respectfully submitted,

/s/ Paul F. Wight

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June 5, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have on this 5th day of June 2026, caused to be served a copy of the foregoing upon all parties on the service lists in these proceedings in accordance with the requirement of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2024).

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ATTACHMENT A

Load-Contingent New Capacity at Existing Plants (LCEP) – A Speed to Power Pathway

Constellation Energy Generation, LLC

Load-Contingent New Capacity at Existing Plants (LCEP) – A Speed to Power Pathway

Background and Summary

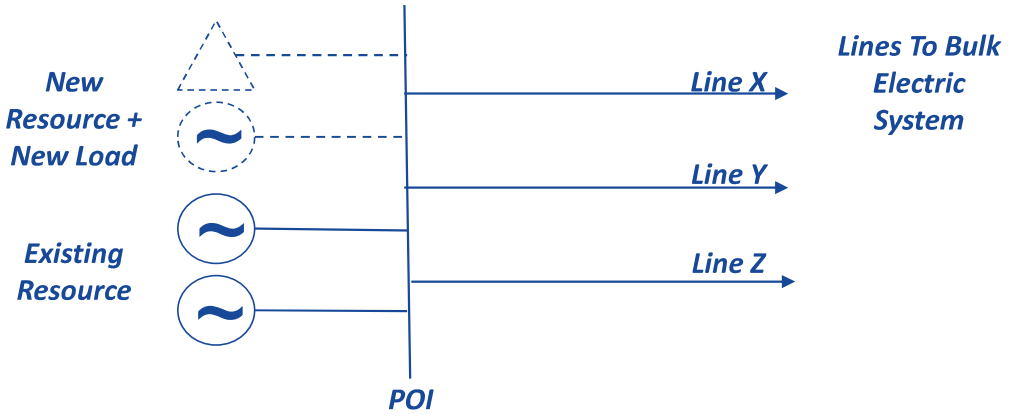
- ANOPR Background – The ANOPR seeks to encourage the connection of large loads "to the transmission system in a timely, orderly, and non-discriminatory manner."
  - The ANOPR encourages novel approaches for achieving this speed to power, including:
    - Studying load together with generating facilities, given "siting a large load near or at the same point of interconnection as a new generating facility could reduce the network upgrades needed to interconnect only the load or only the generating facility." Third Principle.
    - Incentivizing co-location which can "ensure[] efficient buildout of the transmission system." Fifth Principle.
  - The Commission has also looked favorably on novel load/generator connection arrangements recently (e.g., SPP CPP order).
  - The ANOPR leaves to the Commission the task of developing specific implementation rules.
  - Long lead time network upgrades to support new generation is the new normal and will be difficult to overcome
- Load-Contingent New Capacity at Existing Plants (LCEP) – LCEP is a unique generator/load connection arrangement for new load and a commensurate amount of *new* generation to be connected at a site that already has *existing* generation of equal or greater size.
  - Connecting new generation and new load at the same POI as an existing generator (i.e., a location that has already been studied) would simplify the new gen/load study under this LCEP proposal.
  - The new LCEP (generation/load pair at an existing site) would create no new thermal power flow study conditions that haven't

The LCEP proposal can provide an expedited means of connecting new generation and new load. The Commission should require RTOs to include the LCEP proposal as an option in ANOPR responses.

Constellation.

Gen/Load Pair at Existing Generation Falls Within Scope of Prior Studies and is Likely to Avoid Delays Associated With Network Upgrades

- Siting new gen/load pairs at an existing resource makes use of already studied maximum/minimum net injections to the system.
- Consider the following scenarios*:
  - A – Max output of existing generation resource
  - B – Loss of single existing generation unit
  - C – Max output of LCEP and existing
  - D – Loss of new LCEP generation
- LCEP passes and gains speedy online dates if scenarios C & D fall between already-studied scenarios A & B:
  - Is B <= C <= A?: Yes, max output to system unchanged AND
  - Is B <= D <= A?: Yes, min output to the system unchanged.



** To ensure that the total generation does not exceed the studied values, if the new load is reduced or drops, mechanisms similar to those used in surplus or hybrid interconnection would be in place.*

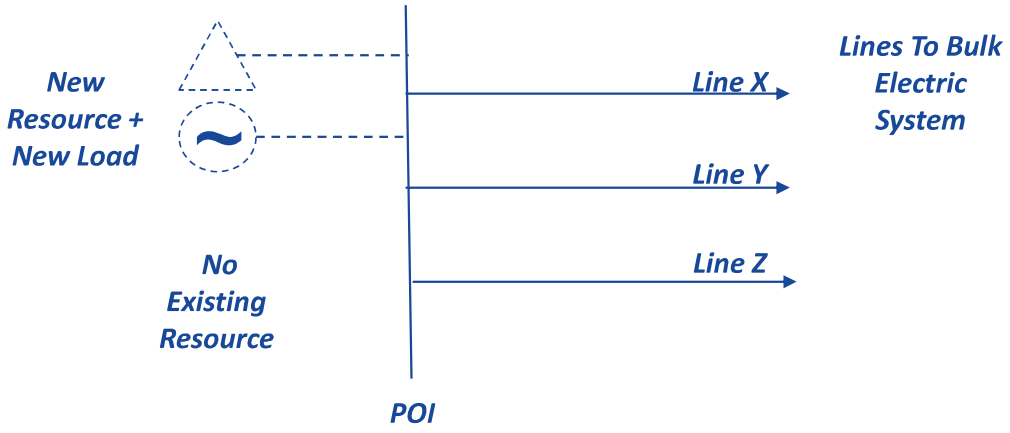
Scenario	Description	Existing Resource Output	Loss of Generator	New Resource Output	New Load	Flow on Line X	Flow on Line Y	Flow on Line Z
A	Max Existing Output	1,745	N/A	0	0	891	427	425
B	Loss of Single Existing Unit	864	Existing	0	0	436	213	212
C	Max Output of LCEP and Existing	1,745	N/A	800	800	891	427	425
D	Loss of New LCEP Generation	1,745	New	0	800	479	233	231

LCEP leverages studies that have already been conducted to provide a more rapid, yet still reliable, interconnection study process for the addition of gen/load pair to the system, while also reducing the likelihood of delays associated with network upgrades.

Constellation.

Gen/Load Pair Not Located at Existing Plant More Likely to Fail Study Criteria and Result in Delays Associated With Network Upgrades

- Siting new gen/load pairs **without** an existing resource **does not** make use of already studied maximum/minimum net injections to the system.
- Consider the following scenarios:
  - A – No study of existing generation resource
  - B – No loss of generation to study since no existing resource
  - C – Max output of gen/load pair
  - D – Loss of new generation
- Gen/load pair doesn't qualify for LCEP study process because scenarios C & D need to equal A to have been already-studied:
  - Is C = A?: Yes, max output to system unchanged AND
  - Is D = A?: No, un-studied condition because line flows exceed levels previously studied.



Scenario	Description	Existing Resource Output	Loss of Generator	New Resource Output	New Load	Flow on Line X	Flow on Line Y	Flow on Line Z
A	No Study of Existing Generation	N/A	N/A	N/A	N/A	487	1,500	1,013
B	No Loss of Generation to Study	N/A	N/A	N/A	N/A	N/A	N/A	N/A
C	Max Output of New Gen/Load Pair	N/A	N/A	800	800	487	1,500	1,013
D	Loss of New Generation	N/A	New	0	800	1,124	1,337	1,013

Gen/Load Pair less likely to pass study criteria unless *sited at an existing plant* and more likely to be delayed due to network upgrades as a result.

LCEP Pathway Process and Details

Overview

New generation and new load would apply together to be sited at the same point of interconnection (POI) as an existing generation resource. In these configurations, the new load would be sized less than or equal to an existing unit at the POI and the new generator would be sized commensurate with the new load. Projects meeting the combined criteria would qualify to be studied using the LCEP process.

LCEP Process

- LCEP generation is, in essence, a new category of generation resource – one that is deliverable only to the new load with which it is paired. The new generator would be studied outside of the standard interconnection queue since it is already "deliverable" by virtue of its electrical proximity to the new load, but would still be dispatched similarly to other capacity resources in planning cases, contingent on the paired load being online (no net injection).
  - A load outage is not typically planned for currently and therefore should not need to be a part of the LCEP process studies. However, even if such studies were to be required, the operational conditions applicable to LCEP would address the load outage (i.e., operational mechanisms similar to those used in surplus or hybrid interconnection, would apply to the circumstance when load reduces or drops).
  - Said another way, there would be no increase in net injection to the grid across the *existing* generation and *new* generation/load pair
- Speed to power is facilitated by leveraging the existing power system and power system studies – specifically existing generation resource POIs. The LCEP proposal would create no new thermal power flow study conditions that haven't already been studied and planned for at the existing generator POI. Therefore, an LCEP queue reduces unnecessary noise and delays in the RTO study process while reducing the risk of delays from network upgrades. RTO would control what studies are performed, consistent with NERC requirements.

Clearway

September 1, 2026

PJM Large Load Enablement Through Dedicated Co-Located Generation and Load Integration Pathways

Recommendation

Clearway appreciates the opportunity to provide alternative proposals for PJM to address FERC's Show Cause Order. Instead of modifying the New Service Request process in a way that affects all interconnection requests, PJM should initiate stakeholder discussions to develop:

1. A dedicated co-located generation interconnection service, similar to MISO's Zero Injection Generator Interconnection Agreement (ZGIA)[1], with a path to full deliverability;
2. A standalone large load transmission study process, akin to MISO's Expedited Project Review (EPR)[2] process; and
3. A workplan to accelerate study timelines and integrate planning processes.

Background

PJM's current proposal seeks to address FERC's concerns with large load integration by merging transmission service requests for large loads into the existing generator interconnection process and compressing study timelines. While improved study speed is an important objective, this approach does not meet the immediate needs of large load requests, nor does it address the unique characteristics of large load and co-located generation projects. The proposal also does little to increase cost certainty for developers, as projects remain subject to the same queue dynamics, evolving assumptions, and upgrade assignments that characterize today's interconnection process. Additionally, PJM does not yet have the automated tools that it is proposing to use in Cycle 2. It took MISO years to select and integrate SUGAR, and even after adopting the tools, the first rounds of automated studies needed months of corrections that were never fully resolved. We also echo ACP's concerns regarding cost allocation, and that a November filing may force this proposal to be implemented prematurely.

Rather than forcing large load into a generator interconnection framework that was not designed for them, PJM should develop dedicated processes tailored to the distinct engineering and planning considerations associated with co-located generation and large loads.

[1] ZGIA overview on pages 6–9. Midcontinent Independent System Operator, Inc., Transmittal Letter, Docket No. ER26-3552-000, at 1 (filed Aug. 18, 2026), *available at* https://cdn.misoenergy.org/2026-08-18%20Docket%20No.%20ER26-3552-000_ZGIA%20Filing776232.pdf.

[2] MISO Transmission Planning Business Practice Manual 20 rev 34, Section 4.1.4, 1 July 2026.

Proposed Framework

1. Dedicated Co-Located Generation Interconnection Service

We agree with PJM that its market structure and planning framework differ from those of neighboring RTOs. However, the principle underlying FERC's Show Cause is directly applicable to PJM: projects that primarily serve a specific nearby load should not necessarily be studied and treated identically to projects seeking broad access to the transmission system.

PJM should establish a new interconnection service and study path for generation that is physically and operationally linked to a specific large load. Similar to MISO's ZGIA framework, the study would test for local system impacts, so the service would not provide broad access to the transmission system.

To qualify, projects would demonstrate:

- A contractual relationship between the generation resource and associated load;
- Electrical proximity sufficient to limit impacts on the broader transmission system (e.g., same substation);
- Controls and operating limitations that prevent or tightly constrain exports beyond the associated load's requirements; and
- Participation in PJM energy and ancillary service markets consistent with its operational limitations.

Having a separate path would minimize impacts to all interconnection customers and allow requests to be potentially studied before Cycle 2 begins.

Given PJM's unique capacity market construct, the framework should also include clear rules governing capacity accreditation and RPM participation. Associated generation would have its capacity qualify under BYONC for the load it is intended to serve. It would also be subject to offer obligations consistent with operational limitations. For resources that also seek injection rights, either in parallel or in the future, there would be an expedited pathway to secure CIRs and convert their ZGIA into a full GIA.

2. Separate Large Load Study Process

PJM should also establish a dedicated transmission service review process for large loads analogous to MISO's EPR framework.

This process would:

- Evaluate transmission upgrades required to serve the load,

- Allow associated generation to be modeled as a planning input,
- Provide early visibility into transmission reinforcement needs, and
- Produce upgrade cost estimates and schedules independent of the interconnection queue.

This approach will help provide transparency into the "but-for" system upgrades for large loads and allow for separate cost allocation, while still considering nearby generation. This would also allow large loads to be studied more quickly and potentially before Cycle 2 begins; the EPR process targets 30 days for review and approval, and EPR requests do not need to wait on generator interconnection clusters to move forward.

3. Improve Study Timelines and Build Comprehensive Planning

Clearway supports PJM's goal to shorten interconnection study timelines. To implement a new process assuming fully functioning automation, PJM needs to start developing and testing these tools today. We recommend that PJM run an RFP to select a vendor, then dedicate time to run iterative shadow studies on Cycle 1 to prove the tool's accuracy before relying on it.

We agree with PJM that incorporating the needs of generation and load, together with RTEP's reliability and economic needs, will produce more efficient upgrades that will benefit all customers. To build more comprehensive planning into its processes, PJM should launch a stakeholder process, one that considers PJM's current proposal alongside other creative solutions. This effort could start at the Planning Committee, and if warranted, expand into a dedicated task force. A separate process would allow this significant reform to receive the depth of review it deserves, rather than being rushed as part of PJM's near-term compliance fix.

Conclusion

Clearway asks PJM to consider this alternative proposal before the next workshop, and we welcome the opportunity to discuss these ideas in more detail. We believe this plan would:

- Provide a more direct response to FERC's concerns regarding large load integration within the near-term compliance deadline;
- Better align study scopes with actual system impacts;
- Improve speed to power for large load customers; and
- Allow dedicated resources to put broader interconnection reform on a durable path forward.

Michelle Greening & Mollie Lacek
Stakeholder Affairs
PJM
Via E-mail

September 1, 2026

Re: Co-Located Load Order Workshop: Alternative Approaches to a Transmission Service Request Process

CEBA appreciates PJM's willingness to solicit stakeholder feedback on approaches to complying with the Federal Energy Regulatory Commission's large load Show Cause Order and, in particular, PJM's proposed framework for studying Transmission Service Requests for Large Loads within the New Services Queue (as presented at the August 18th Co-Located Load Order Workshop).

At a high level, we have significant concerns regarding PJM's proposal to create a consolidated and substantially overhauled New Services Queue process that would study generation interconnection and transmission service requests in the same cluster process. In our view, the proposal introduces significant interconnection cost and schedule risk for both generation and loads seeking to interconnect, in addition to undermining the efficiencies of regional transmission planning. A 12-month timeline may also not be consistent with FERC's expedited timeline in the Show Cause Order.

Rather than pursuing a fundamental redesign of the New Services Queue, we encourage PJM to evaluate a more targeted approach such as a dedicated Transmission Service Request process that could work in parallel with RTEP. We would appreciate PJM explaining to stakeholders how it arrived at the current proposal and what alternatives it considered. For example, one possible model to examine is MISO's Expedited Project Review (EPR) process. A targeted process may satisfy FERC's directives in a more tailored way while avoiding harmful impacts for the functioning of the New Services Queue.

We would like to work with you and other stakeholders in the coming weeks to help evaluate alternatives. We appreciate PJM staff's willingness to solicit stakeholder input and look forward to engaging with you further.

Sincerely,

/s/ Nidhi J. Thakar

Nidhi J. Thakar

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