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November 21, 2025

Mr. David Parsons
Grid Deployment Office
U.S. Department of Energy
1000 Independence Avenue SW,
Washington, D.C., 20585

RE: *Accelerating Speed to Power/Winning the Artificial Intelligence Race:
Federal Action to Rapidly Expand Grid Capacity and Enable Electricity
Demand Growth.*

RFI Response – Accelerating Speed to Power

Dear Mr. Parsons:

Pursuant to the Department of Energy’s (“DOE” or the “Department”) September 18, 2025 Request for Information (“RFI”), PJM Interconnection, L.L.C. (“PJM”) hereby submits the following comments.

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Regards,

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Comments of PJM Interconnection, L.L.C.

PJM Interconnection, L.L.C. (“PJM”) is a Federal Energy Regulatory Commission (“FERC”)-designated Regional Transmission Organization (“RTO”),¹ responsible for administering centralized wholesale markets for energy, capacity, and ancillary services, coordinating integrated generation and transmission operations, and planning network transmission facilities across a region spanning thirteen states and the District of Columbia, and serving sixty-seven million Americans.

PJM is institutionally structured to have no financial interest in any of the activities it conducts, whether in wholesale markets, system operations, or network transmission planning. PJM has no investors, shareholders, or substantive business assets of any kind, and its staff, management, and governing Board of Managers are legally required to divest any financial interest in PJM Members or market participants.² PJM is submitting these comments solely to provide its independent and financially disinterested perspective on some of the issues identified in the RFI.

PJM is committed to working with its Transmission Owners and customers to ensure the timely and reliable integration of large loads onto the Bulk Electric System (“BES”). PJM recognizes and supports the important national goal of integrating Artificial Intelligence (“AI”) and related data centers so that the nation can remain a leader in the development of AI technology. Consistent with that approach, PJM notes that Northern Virginia is today the host of one of the

¹ See <https://www.ferc.gov/power-sales-and-markets/rto-and-isos>.

² See, e.g., PJM Operating Agreement, Section 10.2.1 (“No Board Member, officer or employee of the Office of the Interconnection, or spouse or dependent children thereof, shall own, control or hold with power to vote Prohibited Securities subject to the following . . .”); 18 C.F.R. § 35.34(j)(1)(i) (“The Regional Transmission Organization, its employees, and any non-stakeholder directors must not have financial interests in any market participant.”).

world's largest concentration of data centers which have served to bring the benefits of the digital economy to countless Americans.

I. Comments

The RFI requests “stakeholder input on how to best utilize [DOE’s] funding programs and authorities to rapidly expand energy generation and transmission grid capacity to meet electricity demand growth across the country in a reliable and affordable manner.”³

PJM offers the following regarding where greater DOE involvement may be beneficial in addressing this goal.

A. Identifying Large Loads That Impact National Security

Although PJM is supportive of effective integration of all large loads, to the extent that prioritization is important given the pace of data center integration and the time needed to construct needed new generation and transmission, direction should be provided by the federal government to ensure that those facilities critical to the national defense are identified and prioritized on a confidential basis. DOE, working with its counterparts among the federal agencies, could assume a key role in identifying which large load additions directly support national security and therefore are appropriate candidates for prioritization. For example, in the context of data centers, the Department could develop a secure protocol by which it identifies which facilities implicate functions essential to national strategic priorities, and which do not. Certainly some of that information sharing already exists. However, given the pace of data center development and the greater reach and uses of AI, an updating of those protocols would be appropriate. Refining and sharing this updated protocol, and the specific large loads identified by the Department, on a confidential basis with grid operators such as PJM would provide important information that could

³ RFI at 1.

then be accounted for during real-time operations. In addition, the DOE, in consultation with states and other regulatory bodies, could provide insights and designate targeted data center growth levels at a zonal or a state level, which PJM and other RTOs/ISOs could use to inform their development of near, mid and long-term forecasts, leading in turn to the development of efficient and enabling transmission and generation capacity infrastructure. The Department, in coordination with other federal entities, is aptly positioned to provide leadership and guidance on this issue.

B. Designating National Interest Electric Transmission Corridors (“NIETCs”)

DOE could utilize its existing statutory authority⁴ to designate National Interest Electric Transmission Corridors (“NIETCs”) for the specific purpose of facilitating transmission development to address large loads of national strategic importance. In any such application of NIETCs, the Department should adopt a “two-step” sequential process. Under the first step, the process should leverage the results of the RTOs/ISOs’ well-established FERC-approved regional and interregional planning processes (that identify a system’s reliability, market efficiency, and public policy needs). Under the second step, the process should then utilize this large identified class of RTO/ISO-approved projects as the menu of options to address the national interest and other statutory criteria necessary for a NIETC designation.

Using the FERC-approved planning process of RTOs/ISOs will ensure that the project ultimately chosen by DOE has been evaluated by the RTO/ISO planning authority as required to satisfy system needs and was found to be the more efficient and/or cost effective solution of all alternatives considered. The Department would then also avoid having to undertake its own grid analysis or risk choosing projects for NIETC designation that the RTO/ISO ultimately determines do not adequately meet system reliability, market efficiency, or public policy needs economically

⁴ 16 U.S.C. § 824p.

and efficiently. Such a process which focuses on large loads and national security interests would help advance Congress' criteria for NIETCs which include, in relevant part:

(C) the energy independence or energy security of the United States would be served by the designation;

(D) the designation would be in the interest of national energy policy;

(E) the designation would enhance national defense and homeland security;⁵

This re-orientation of the NIETC process away from the Department's prior approach has several benefits. For one, without a clearly defined and updated focus on AI development and national security needs, the Department could find itself continuing to be called upon by developers/applicants who are seeking to end-run the detailed RTO/ISO analyses and competitive planning processes established by the Nation's independent RTOs/ISOs. Moreover, the DOE would find itself in the anomalous position of becoming a government "super-planning" entity, having to sort through projects that may lack the benefits of adequate process-based consultation and evaluation, and may prove to be inefficient, not cost-effective, or face significant routing and siting risks. These are factors that may work against the goal of advancing AI integration and simultaneously ensuring adequate electricity supplies.

C. Convene Discussions to Encourage Greater Standardization in Load Forecasting Among Transmission Planners.

The Department could convene Transmission Planners from across the United States to discuss greater standardization and uniformity in practices for load forecasting, particularly as it relates to large loads. DOE could certainly do this itself, or request that the North American

⁵ *Id.*

Electric Reliability Corporation (“NERC”) undertake such an effort, as it has done recently with respect to capacity accreditation methodologies.⁶

Such standardization and uniformity in load forecasting could be synchronized with the methodology to identify the national security impacts of large loads described above in Section I(A), and serve as a useful tool in developing common processes in real-time operations and system planning. Additional consistency in this area would also help avoid duplicative or speculative projects being considered in multiple regions as data center and large loads ‘shop’ for locations.

D. Use Section 403 of the DOE Act to Request that FERC Direct NERC To Develop Rules of Procedure Modifications and/or Reliability Standards.

If necessary, the Department could utilize its authority under Section 403(a) of the Department of Energy Organization Act⁷ to request that FERC utilize its authority under FPA section 215(f)⁸ and 215(d)(5)⁹ to direct NERC to ensure a proper system of registration of large loads, and potentially to submit reliability standards necessary to address the concerns identified in the RFI. Here again the Department’s leadership in identifying the parameters of the concerns posed by large loads from a national strategic standpoint would be critical, as it would inform the Commission’s order(s) eventually issued under FPA sections 215(f) and 215(d)(5), and in turn, establish the parameters of the rules and standards development process at NERC. Moreover,

⁶ https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/elcc_report_september_2025.pdf

⁷ 42 U.S.C. § 7173(a) (“The Secretary ... [is] authorized to propose rules, regulations, and statements of policy of general applicability with respect to any function within the jurisdiction of the Commission under section 402 of this Act.”).

⁸ 16 U.S.C. § 824(f) (“The Commission, upon its own motion or complaint, may propose a change to the rules of the ERO. A proposed rule or proposed rule change shall take effect upon a finding by the Commission, after notice and opportunity for comment, that the change is just, reasonable, not unduly discriminatory or preferential, is in the public interest, and satisfies the requirements of subsection (c).”).

⁹ 16 U.S.C. § 824(d)(5) (“The Commission, upon its own motion or upon complaint, may order the Electric Reliability Organization to submit to the Commission a proposed reliability standard or a modification to a reliability standard that addresses a specific matter if the Commission considers such a new or modified reliability standard appropriate to carry out this section.”).

registration of these large loads as users of the BES would enable NERC and grid operators to better plan for and set standards to manage fluctuations in demand and other attributes of large data centers that could, unless appropriately managed, degrade reliability.

Using this approach would permit DOE to identify the reliability concerns that future reliability standards must address, while simultaneously permitting extensive industry and stakeholder input in developing any appropriate registration requirements and reliability standards to meet those concerns via the NERC rules and standard development process.

E. Update the Department’s Regulations Related to the Defense Production Act.

The Defense Production Act (“DPA”)¹⁰ authorizes the President, acting through the Secretary of Energy, to prioritize performance of contracts necessary for the national defense and/or to maximize domestic energy supplies above other contracts.¹¹ This prioritization authority also entails the requirement that companies performing such contracts accept them.¹²

While the current Congressional authorization for the DPA expired on September 30, 2025,¹³ in the event that the statute is reauthorized, the Department could conceivably use its authorities to prioritize grid resources, deliveries of certain fuel supplies, and to address constraints in the supply chain necessary to effectuate the goals of the RFI.

¹⁰ 50 U.S.C. §§ 4501 et seq.

¹¹ *Id.* at § 4511(a).

¹² *Id.*

¹³ *Id.* at 4564(a) (“Subchapter I (except section 4514 of this title), subchapter II, and subchapter III (except sections 4557, 4558, and 4565 of this title) shall terminate on September 30, 2025, except that all authority extended under subchapter II shall be effective for any fiscal year only to such extent or in such amounts as are provided in advance in appropriations Acts.”).

To this end, DOE would benefit greatly from updating its implementing regulations in 10 C.F.R. § 217 to clarify the role of state and local regulatory authorities, as well as grid operators such as PJM, in implementing any future orders issued by the Secretary pursuant to the DPA.

II. Conclusion

The issues raised in the RFI require concentrated discussion and deliberation, as well as timely action. PJM stands ready to work with the DOE to further engage on the above topic areas and others of interest to the DOE under consideration. PJM appreciates the Department's proactive outreach to the industry through this RFI process as an important step in that critical task.

Respectfully submitted,

/s/ Thomas DeVita

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