

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Interconnection of Large Loads to the)
Interstate Transmission System)**

Docket No. RM26-4-000

**REPLY COMMENTS OF
PJM INTERCONNECTION, L.L.C.**

PJM Interconnection, L.L.C. (“PJM”) respectfully submits reply comments to initial comments submitted in response to the Advance Notice of Proposed Rulemaking issued by the Federal Energy Regulatory Commission (“Commission”) on October 27, 2025.¹ Various initial comments in response to the ANOPR addressed the need to enhance generator interconnection processes to expedite the interconnection and operation of new generation. PJM therefore provides an update on the progress of its generator interconnection reforms and its efforts to clear the prior interconnection backlog to bring more energy and capacity online quickly and efficiently.²

The Commission accepted PJM’s generator interconnection reforms in November 2022,³ and by July 2023, PJM had cleared enough of the interconnection request backlog to begin the transition from the prior process to the reformed process.⁴ From July 2023 through December

¹ *Interconnection of Large Loads to the Interstate Transmission System*, Advance Notice of Proposed Rulemaking, Docket No. RM26-4-000 (Oct. 23, 2025) (“ANOPR”); *see Interconnection of Large Loads to the Interstate Transmission System*, Notice Inviting Comments, Docket No. RM26-4-000 (Oct. 27, 2025).

² PJM respectfully moves for leave to file its reply comments out-of-time. The Commission accepts filings out-of-time when they will aid the Commission in its decision-making process. *See, e.g., Am. Transmission Co. LLC*, 105 FERC ¶ 61,388 at P 12 (2003).

³ *PJM Interconnection, L.L.C.*, 181 FERC ¶ 61,162 (2022), *order on reh’g*, 184 FERC ¶61,006 (2023), *affirmed sub. nom. Hecate Energy LLC v. FERC*, 126 F.4th 660 (D.C. Cir. 2025).

⁴ *PJM Interconnection, L.L.C.*, Notification of Occurrence of Transition Date of PJM Interconnection, L.L.C., Docket No. ER22-2110-001 (July 11, 2023).

2024, during the first 18 months of the transition period, PJM processed approximately 140 gigawatts (“GW”) of generator interconnection requests.⁵

The Commission approved PJM’s Reliability Resource Initiative (“RRI”) filing in February 2025,⁶ and on May 2, 2025, PJM communicated the results of the RRI process to Members: PJM selected 51 projects, including both uprates of existing facilities and new projects, and representing approximately 11.8 GW of energy and 9.3 GW of unforced Capacity (“UCAP”).⁷ Those 51 projects include eight projects with 2028 requested in-service dates, representing 329.6 megawatts (“MW”) of UCAP.⁸ The RRI projects were added to Transition Cycle No. 2, which reached Phase II of the process on December 3, 2025, and is expected to be complete by February 2027.⁹ At present, Transition Cycle No. 2 represents approximately 30.5 GW.¹⁰

Transition Cycle No. 1, which is in its Final Agreement Negotiation Phase, will be completed and generators in that Cycle will have signed service agreements to connect to the grid in January or February 2026, as PJM issued 135 Transition Cycle No. 1 service agreements for

⁵ *Interconnection Reform Progress Fact Sheet: Generation Interconnection*, PJM Interconnection, L.L.C. (June 2025), <https://www.pjm.com/-/media/DotCom/about-pjm/newsroom/fact-sheets/interconnection-reform-progress-fact-sheet.pdf>.

⁶ *PJM Interconnection, L.L.C.*, 190 FERC ¶ 61,084, *order on reh’g*, 192 FERC ¶ 61,085 (2025), *appeal pending sub. nom.* Petition for Review, *Solar Energy Indus. Ass’n v. FERC*, No. 25-2124, et al. (3d Cir. June 13, 2025).

⁷ Donnie Bielak, *Reliability Resource Initiative Results Summary*, PJM Interconnection, L.L.C., 6 (May 6, 2025), <https://www.pjm.com/-/media/DotCom/committees-groups/committees/pc/2025/20250506/20250506-item-06---reliability-resource-initiative---summary-results.pdf>.

⁸ See Donnie Bielak, *Reliability Resource Initiative Additional Summaries*, PJM Interconnection, L.L.C., 6-7 (May 6, 2025), <https://www.pjm.com/-/media/DotCom/committees-groups/committees/pc/2025/20250506/20250506-rri-addendum---post-meeting.pdf>.

⁹ See *Planning*, PJM Interconnection, L.L.C., <https://www.pjm.com/planning> (scroll down page to “Cycle Timeline” (as of 12.3.2025 3:01 p.m. EPT)).

¹⁰ See *Planning*, PJM Interconnection, L.L.C., <https://www.pjm.com/planning> (scroll down page to “Generation Interconnection Requests by Fuel Type”).

execution on December 10, 2025.¹¹ At present, Transition Cycle No. 1 represents approximately 14.77 GW.¹²

The application deadline for Cycle No. 1, the first Cycle that will be processed fully under the reformed interconnection process new rules (as opposed to the transition period rules PJM currently applies), is April 27, 2026, and Cycle No. 1 is expected to be completed in April 2028.

In addition to the projects currently under study or in service agreement negotiations, there are approximately 42.5 GW (installed capacity) of generation projects that have signed service agreements to connect to the grid.¹³ These projects have cleared PJM's interconnection process and have no PJM-associated impediment to construction.¹⁴

Further, PJM notes that the total amount of new generation and generation uprates has increased to 2,669 MW of UCAP for the 2026/2027 Base Residual Auction ("BRA"), which reverses the downward trend in the amount of new generation and generation uprates of the three prior BRAs.¹⁵

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¹¹ See *Planning*, PJM Interconnection, L.L.C., <https://www.pjm.com/planning> (scroll down page to "Cycle Timeline" (as of 12.3.2025 3:01 p.m. EPT)).

¹² See *Planning*, PJM Interconnection, L.L.C., <https://www.pjm.com/planning> (scroll down to "Generation Interconnection Requests by Fuel Type").

¹³ See *Planning*, PJM Interconnection, L.L.C., <https://www.pjm.com/planning> (scroll down page to "Projects Under Construction by MW").

¹⁴ *PJM Completes Interconnection Reform Transition Cycle 1 Studies*, PJM Interconnection, L.L.C. (Sept. 22, 2025), <https://insidelines.pjm.com/pjm-completes-interconnection-reform-transition-cycle-1-studies/>.

¹⁵ *2026/2027 Base Residual Auction Report*, PJM Interconnection, L.L.C., 3 (July 22, 2025), <https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2026-2027/2026-2027-bra-report.pdf>.

PJM requests that the Commission consider these reply comments and looks forward to continuing to engage with the Commission, the United States Department of Energy, the PJM states, and other stakeholders concerning large load interconnection.

Respectfully submitted,

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