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Via email (AskCR@hq.doe.gov)

The Honorable Chris Wright
Secretary of Energy
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Re: Request for Emergency Order Under Federal Power Act, Section 202(c)

Dear Secretary Wright:

In response to your letter of January 22, 2026,¹ PJM Interconnection, L.L.C. (“PJM”) respectfully requests that you issue an order under section 202(c) of the Federal Power Act authorizing PJM to direct backup generation resources (whether auxiliary, standby, directly-connected, battery storage or other, and whether synchronized or not to the bulk power system) at large loads² to operate as a last resort before declaring an Energy Emergency Alert (EEA) 3 (i.e., before firm load interruption) or during an EEA 3.³

PJM further requests that your order make clear that PJM may call upon its Transmission Owners to work with Electric Distribution Companies to take lawful actions to implement this order and support large load customers in bringing these backup resources online (including by disconnecting large loads from utility source powers).⁴

¹ Letter from Secretary of Energy Chris Wright to Reliability Coordinators and Balancing Authorities (Jan. 22, 2026), <https://www.energy.gov/documents/leveraging-backup-generation-facilities-during-energy-emergencies>.

² For purposes of this request, and in an effort to afford sufficient notice to potentially impacted large loads, large loads is defined to include, but not be limited to, data centers and hyperscale facilities and other industrial and commercial customer sites that have a cumulative peak load quantity greater than or equal to 50 MW at each delivery point or Point of Interconnection. PJM continues to evaluate a definition for large load for purposes beyond this specific request, and may revisit this proposed megawatt threshold in future requests for emergency relief.

³ See NERC Reliability Standard EOP-011-4, Attachment 1, at 3.1 (“The Reliability Coordinators and the energy deficient Balancing Authority shall continue to take all actions initiated during EEA 2.”).

⁴ PJM, with overwhelming support from its stakeholders, has added emergency procedures to its Manual 13 to implement emergency orders like the one being requested here to leverage backup generation serving large loads. These modifications were approved at the June 24, 2026 meeting of PJM’s Markets and Reliability Committee

PJM may need to rely upon this emergency authorization during the upcoming forecasted hot weather conditions, accompanied by temperatures in the 90s and exceeding 100F in the BGE/PEPCO/Dominion Zones, expected to affect many parts of PJM's region between June 29 and July 3, 2026. In particular, PJM is forecasting a potential new all-time PJM peak load on Thursday, July 2 and load levels on Wednesday, July 1 and Thursday, July 2 that are forecasted to exceed last year's peaks. Such conditions could arise from, among other things, RTO capacity deficiencies and/or transmission constraints (*i.e.*, imports into BGE/PEPCO/Dominion area).

PJM is taking other emergency actions within its authority, and will deploy all available reliability tools—except for frequency responsive services and voltage reduction action—but before any firm load interruption, to avoid having to rely upon the relief requested herein. In particular, PJM has recalled generator and transmission outages to the extent possible, and issued a Maintenance Outage Recall on June 25 in place as of 00:01 on June 29 in an effort to bring units into operational status to address potential capacity emergencies. Notwithstanding these efforts, PJM projects tight reserves during the forecasted July 1, 2026 peak of 159,563 MW and July 2, 2026 peak of approximately 162,860 MW. Forecasted peak loads are preliminary and could come in higher depending on changes to forecasted temperatures. PJM anticipates it may not be able to meet the day ahead scheduling reserve requirement and anticipates issuing a Max Gen/Load Management Alert/EEA1.

PJM is the regional transmission organization designated by the Federal Energy Regulatory Commission to manage the real-time operation and future planning of the bulk power system that serves more than 67 million customers in all or part of 13 states and the District of Columbia. Under the framework established by the North American Electric Reliability Corporation (“NERC”), PJM also serves as the Reliability Coordinator, Transmission Operator, and Balancing Authority for its region and is, therefore, responsible for overseeing the dispatch of generation to meet system demand at all times within the limits of the transmission system. In these roles, PJM also directs actions that may be needed to avoid and mitigate emergency conditions that may arise from time to time.

Allowing PJM to call upon its Transmission Owners to work with Electric Distribution Companies to communicate the Department's order that backup generation facilities at large loads operate so that those large loads can rely on power generated by backup generation facilities rather than grid power under conditions of energy scarcity could help the RTO avoid

and became effective immediately. Among the new procedures is an “Emergency Use of Backup Generators Warning” and an “Emergency Use of Backup Generator Action,” and when the latter is issued, facilitates Transmission Owners' work with Electric Distribution Companies to implement this order and support large load customers in bringing backup resources online within 15 minutes as a last resort only after all available generation resources and load management tools are exhausted and prior to a Voltage Reduction Action or Manual Load Dump Action. See *PJM Adds Emergency Procedures to Maintain Reliability*, PJM Inside Lines (June 24, 2026), <https://insidelines.pjm.com/pjm-adds-emergency-procedures-to-maintain-reliability/>.

residential load shed at EEA level 3. PJM notes that you previously issued orders permitting other regions, including PJM, to dispatch such generation under similar circumstances.⁵

PJM requests that you issue an order by noon Eastern Daylight Time on June 30, 2026, to be effective, June 30, 2026 at 11:59 p.m through 11:59 p.m. Eastern Daylight Time on July 3, 2026, authorizing PJM to direct backup generation resources at large loads to operate, whether specifically identified by the Department as having backup generation facilities or otherwise available, pursuant to a Section 202(c) Order and to use those backup generation facilities instead of grid power during or as a last resort before declaring an RTO wide or local⁶ EEA event or Interconnection Reliability Operation Limit (“IROL”) event. PJM further requests that the order make clear that PJM may call upon its Transmission Owners to work with Electric Distribution Companies to take lawful actions to implement this order and support large load customers in bringing these backup resources online (including by disconnecting large loads from utility source powers).

PJM further requests that consistent with the provisions of Section 202(c) of the Federal Power Act, your order allow such use of backup generation by large loads notwithstanding any applicable environmental limitations under federal, state, or local law or regulation.

PJM appreciates your consideration of this request. Please do not hesitate to contact me or my staff if you require any additional information to act on this request.

Respectfully submitted,

/s/ Michael E. Bryson

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⁵ See, e.g., Amended Order No. 202-26-01A (Jan. 25, 2026); Order No. 202-26-06 (Jan. 26, 2026); Order No. 202-26-07 (Jan. 26, 2026); Order No. 202-26-23 (May 18, 2026).

⁶ For example, Emergency Procedures issued only for the BGE/PEPCO/Dominion area.

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Cc:

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