

PUBLIC

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

Oklo Inc.	)	
	)	Docket No. EL26-____-000
Complainant,	)	
	)	
v.	)	
	)	
PJM Interconnection, L.L.C.	)	
Respondent.	)	

**EMERGENCY COMPLAINT, REQUEST FOR FAST TRACK PROCESSING, AND
MOTION FOR SHORTENED ANSWER PERIOD OF OKLO INC.**

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TABLE OF CONTENTS

I. Background.....	2
A. Oklo.....	2
B. Oklo's C01-1735 Project	3
C. PJM's Review of the C01-1735 Project.....	4
D. Status of PJM's Cycle 01 Interconnection Study	8
II. Complaint.....	8
A. PJM Conducted its Review of the Project in an Unjust, Unreasonable, and Unduly Discriminatory Manner.	9
B. PJM's Application of an IBR-Specific Stability Standard to the Mixed Technology C01-1735 Project Violates PJM's Own Guidelines and Has No Basis in PJM's Tariff.	11
III. Requested Relief	16
IV. Request for Fast Track Processing	17
V. Motion for Shortened Comment Period.....	18
VI. Compliance with Rule 206 Requirements	18
1. Sections 206(b)(1), (2) – Identification of Violation of Regulatory Requirement and Explanation of Violation	18
2. Sections 206 (b)(3)-(5) – Business, Commercial, Economic, or Other Issues Presented, the Financial Impact, and the Practical/Operational Impact	19
3. Section 206(b)(6) – Related Proceedings	19
4. Section 206(b)(7) – Specific Relief Requested.....	19
5. Section 206(b)(8) – Documents that Support the Complaint.....	19
6. Section 206(b)(9) – Dispute Resolution	20
7. Section 206(b)(10) – Form of Notice.....	21
8. Rule 206(c) Service on Respondent.....	21
VII. Correspondence and Communications.....	21
VIII. Conclusion	22

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PROCESSING AND MOTION FOR SHORTENED ANSWER PERIOD**

Pursuant to Sections 206, 306, and 309 of the Federal Power Act (“FPA”)¹ and Rule 206 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),² Oklo Inc. (“Oklo”) hereby submits this emergency complaint against PJM Interconnection, L.L.C. (“PJM”) concerning PJM’s implementation of its interconnection procedures in reviewing Oklo’s interconnection request for its 750 MW mixed technology (advanced nuclear, natural gas, and fuel cell) generation project (“C01-1735” or “Project”). The Project is of critical national importance, [REDACTED]

[REDACTED].³ The Project’s inclusion in PJM’s Cycle 01 interconnection study process (“Cycle 01”) is critical to [REDACTED]

¹ 16 U.S.C. §§ 824e, 825e, 825h.

² 18 C.F.R. § 385.206.

³ Oklo requests that certain information be redacted from the public filing. *See* 18 C.F.R. § 388.112. This information is non-public and commercially sensitive, and its release could harm Oklo.

As demonstrated herein, PJM has unlawfully administered the interconnection process under its Open Access Transmission Tariff (“Tariff”) with respect to the Project and unjustifiably withdrawn the project from Cycle 01. PJM’s withdrawal decision reflects a misapplication of its own guidelines to this unique multi-technology facility and, even assuming *arguendo* that PJM properly applied its guidelines, the alleged deficiencies are technicalities that Oklo could have easily and rapidly cured if it had received proper notice; Oklo has had, and still has, information at the ready that would address PJM’s stated concerns. If left uncorrected, PJM’s withdrawal decision will result in a project delay of at least fourteen months which may have adverse consequences for [REDACTED]

Time is of the essence to get this project online. Although Oklo believes that it has complied with the PJM Tariff and applicable guidelines, Oklo stands ready to remedy the alleged outstanding deficiencies to ensure that the Project can move forward with the upcoming Cycle 01 study. To minimize disruption to the Cycle 01 process, the Commission should expeditiously grant this complaint, direct PJM to reinstate the Project in Cycle 01, and grant other such relief as is necessary to minimize disruption to Cycle 01—including granting waiver of certain tariff provisions for the limited purpose of reinstating the Project and including it in the Cycle 01 model with minimal, or no, disruption to the study timeline.

I. Background

A. Oklo

Oklo is an advanced nuclear technology company developing next-generation fission powerhouses to produce abundant, affordable electricity at a global scale. Several arms of the federal government have independently selected Oklo to support broad national efforts to accelerate the deployment of advanced nuclear powerhouses. Most notably, the U.S. Department

of Energy (“DOE”) selected several of Oklo’s projects to participate in the DOE Reactor Pilot Program, the DOE selected Oklo as a candidate under its Surplus Plutonium Utilization Program, Idaho National Laboratories selected Oklo to partner as part of its “Project Prometheus” to use AI technology to accelerate advanced nuclear reactor and fuel-system design work, and the U.S. Air Force selected Oklo as an intended awardee to deploy a first-of-a-kind advanced nuclear powerhouse at a U.S. Air Force Base. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

B. Oklo’s C01-1735 Project

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Project is a multi-fuel type generator comprised of natural gas, fuel cell, and advanced nuclear generation. This multi-fuel strategy will enable the Project to [REDACTED]

from an interconnection perspective because the existing rules were not designed with the Project's unique fuel mix in mind. Typically, generators are either synchronous or inverter-based. Synchronous resources have a rotating mass that provides stability during voltage disturbances. By contrast, inverter-based resources ("IBRs") rely on grid-following inverters to respond to changing grid conditions. They require extra stability testing to ensure that they can adjust their voltage in response to grid disruptions.⁸ The Project is unique not only because it includes both synchronous units (natural gas and advanced nuclear) and inverter-based units (fuel cells), but also because its synchronous units are of two different fuel types—one of which is an innovative advanced nuclear technology.

[REDACTED] Oklo submitted the Project for review in Cycle 01. The Project's interconnection request includes 150 MW of advanced nuclear generation, 300 MW of fuel cell generation, and 300 MW of natural gas generation.

C. PJM's Review of the C01-1735 Project

On April 27, 2026, Oklo submitted, and PJM confirmed receipt of the Project's project data, signed agreement and deposit information for consideration in PJM's Cycle 01.⁹ On May 2, 2026, PJM further confirmed receipt of Oklo's application and explained that it would shortly begin its application review.¹⁰

7

⁸ *Reliability Standards to Address Inverter-Based Resources*, Order No. 910, 185 FERC ¶ 61,042, at P 11-12 (2023).

⁹ Email from NextGen, Subject: “NextGen - Project data for [REDACTED] has been received (C01-1735),” at 1 (Apr. 27, 2026), included as Attach. C (“April 27 NextGen Receipt”).

¹⁰ Email from NextGen, Subject: “NextGen – New Service Request for [REDACTED] has been submitted (C01-1735),” at 1 (May 2, 2026), included as Attach. D (“May 2 NextGen Confirmation”).

On May 15, 2026, PJM issued its first and only deficiency notice for the Project (“May 15 Deficiency Notice”).¹¹ PJM identified deficiencies in six categories: (1) transformer information, (2) generator information, (3) project capability, (4) point of interconnection, (5) site control, and (6) short circuit data.¹² PJM directed Oklo to respond within 10 business days and to contact its PJM Project Manager with any project-specific questions.¹³ Oklo timely cured all six deficiencies, including, where necessary, by communicating with its PJM Project Manager to explain why certain deficiencies were caused by limitations with PJM’s data submission platform, NextGen. Oklo explained to PJM that NextGen did not have the correct parameters for the Project’s inverter-based resources and PJM responded with instructions for a workaround.¹⁴

On June 9, 2026, PJM emailed Oklo a concern about the Project’s single line diagram.¹⁵ The following day, Oklo proposed a new configuration to address the concern, noting that NextGen did not provide an option to resubmit the data on the system and asking PJM to inform Oklo if PJM had any further questions or required additional action.¹⁶ On June 18, 2026, Oklo

¹¹ Email from NextGen, Subject: “NextGen - PJM requests additional information for [REDACTED] - C01-1735”) (May 15, 2026), included as Attach. E (“May 15 Deficiency Notice”).

¹² *Id.* at 1-2.

¹³ *Id.* at 1.

¹⁴ Email from Grant Wollam, Subject: “C01-1735 - [REDACTED] Deficiencies” (May 18, 2026), included as Attach. F (“Deficiency Correspondence”) (“I originally tried to input the Fuel Cell data as a Fuel Cell in NextGen, but the parameters allowed for entry were identical to a synchronous generator, so they did not make sense for a fuel cell (IBR). The closest option was a solar generator, so that is how I entered them. This has still not been fixed in NextGen. The Fuel Cell option needs to be fixed in NextGen to be reflective of an inverter-based resource like a Fuel Cell, or the parameters I enter will not make any sense (for example, a fuel cell has no value for generator inertia-H). If not, please advise on how I should proceed.”). Grant Wollam is an employee of Found Digital LLC, a consultant Oklo engaged to assist with the Project’s Application.

¹⁵ Email from Kyle Copeland, Subject: “C01-1735 - [REDACTED] Deficiencies,” at 2-3 (June 9, 2026), included as Attach. G (“Single Line Diagram Correspondence”).

¹⁶ Single Line Diagram Correspondence, Email from Grant Wollam, at 1 (June 10, 2026).

received an automated notice that PJM had updated the Project's NextGen's application to incorporate changes to the single line diagram.¹⁷

On June 19, 2026, PJM notified Oklo that it was preparing to schedule project scoping calls, which PJM explained Oklo could elect to waive. On June 22, 2026, Oklo responded that it did not waive its scoping meeting and asked PJM to schedule a call. PJM did not respond to that request. On July 21, 2026, Oklo made its second request for a scoping call, and again PJM did not respond.¹⁸

PJM's lack of response to Oklo's June 10, 2026 email asking PJM to confirm whether any further action was needed indicated to Oklo that all deficiencies had been cured. While Oklo's attempt to confirm status and requests for a scoping meeting went unanswered, a member of PJM's interconnection team posted a comment on the Project's NextGen page on June 24, 2026, identifying five additional, potential deficiencies ("June 24 NextGen Comments").¹⁹ Unlike PJM's May 15 Deficiency Notice, this comment did not generate an email notification to Oklo. Oklo did not receive any notice of the comment until PJM retroactively flagged it in a withdrawal notice, as described below.

On August 3, 2026, after six weeks of silence over email, PJM issued a withdrawal notice ("Withdrawal Notice"), explaining that the Project was "[d]eficient," "[f]ailed to meet Stability requirements," and suffered from discrepancies between the modeling files, NextGen, and PQ

¹⁷ Email from NextGen, Subject: "NextGen - Data for C01-1735 has been changed by PJM Personnel," at 1 (June 18, 2026), included as Attach. H ("June 18 Data Change Notice").

¹⁸ Email from Joshua Stephenson, Subject: "Kickoff Call for C01-1735 - PJM / Dominion / Oklo Power LLC," at 1 (June 19, 2026), included as Attach. I ("Kickoff Call Correspondence"); *see also id.*, Email from Will Chung, at 1-2 (June 22, 2026); *id.*, Email from Will Chung, at 2 (July 21, 2026).

¹⁹ Email from NextGen, Subject: "NextGen - C01-1735 has been withdrawn," at 1 (Aug. 3, 2026), included as Attach. J (referencing the June 24 NextGen Comments) ("Withdrawal Notice").

curves that were not resolved after email follow-up.²⁰ For the first time, PJM emailed notice of its June 24, 2026 comment identifying deficiencies in three categories: (1) failure to re-submit a dynamic modeling guidelines (“DMDG”) report and checklist when Oklo submitted its cure to the May 15 Deficiency Notice, (2) three data inconsistencies, and (3) notice that PJM had found instability when performing a fault test for the entire project.²¹

The following day, Oklo requested the immediate reinstatement of the Project.²² Oklo explained that it did not receive notice that the Project was at risk of withdrawal and that it had cured every deficiency for which PJM issued a deficiency notice.²³ Regarding PJM’s notice of the stability issue, Oklo explained that it had previously “disclosed to PJM that the NextGen portal cannot properly accommodate fuel cells as a generation type” and cured the fuel-cell related fault test issue flagged in the May 15 Deficiency Notice.²⁴ Oklo elaborated that PJM’s DMDG only requires fault testing for inverter-based resources, and PJM only performed fault testing on inverter-based resources on its initial review.²⁵ PJM did not explain why it performed fault testing on the entire facility, merely stating that withdrawal was appropriate because Oklo “[was] not able to demonstrate stability for all fuel types through the low voltage ride through (LVRT) test per the DMDG Guideline.”²⁶ Notwithstanding Oklo’s explanation of the different guideline, PJM responded that its decision was final.

²⁰ Attach. J at 1.

²¹ *Id.*

²² Email from Mike Donohue, Subject: “[URGENT] Request the immediate reinstatement of the [REDACTED] projects to address PJM’s critical regional supply and demand,” at 2 (Aug. 4, 2026), included as Attach. K (“Reinstatement Request Correspondence”).

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Id.*

On August 17, 2026, Oklo invoked dispute resolution under Part VIII.E, Section 419 of the PJM tariff.²⁷ PJM and Oklo have been unable to reach resolution through the dispute resolution process, thus necessitating this Complaint. Notwithstanding Oklo's concerns with PJM's implementation of the DMDG and Tariff, Oklo is prepared to remedy all of PJM's alleged outstanding deficiencies.

D. Status of PJM's Cycle 01 Interconnection Study

On August 3, 2026 (the date of the Withdrawal Notice), PJM announced that 700-plus generators had qualified to be studied in PJM's Phase I study for Cycle 01.²⁸ PJM's website identifies August 28, 2026 as the date of PJM's planned Phase I model posting and September 28, 2026 as the day it plans to commence Phase I study.²⁹

II. Complaint

PJM's decision to withdraw the Project is the capstone to an unjust, unreasonable, and unduly discriminatory review process. As discussed further below, PJM's June 24 NextGen Comments violated PJM's tariff requirements to flag deficiencies promptly and allow Applicants an opportunity to cure deficiencies. The substance of PJM's comments exacerbates the wrong: the stability-related deficiency alleged in the June 24 NextGen Comments results from PJM's misapplication of IBR-guidelines to this unique multi-technology facility. Given the absence of

²⁷ PJM, Tariff, Part VIII.E, § 419 (Internal Dispute Resolution Procedures (0.10)) ("Any dispute between a Transmission Customer or New Service Customer, an affected Transmission Owner, or the Transmission Provider involving transmission or interconnection service under the Tariff (excluding applications for rate changes or other changes to the Tariff which shall be presented directly to the Commission for resolution) shall be referred to a designated senior representative of each of the parties to the dispute for resolution on an informal basis as promptly as practicable.").

²⁸ PJM, "Over 700 New Generation Projects Accepted Into First Cycle of Reformed Interconnection Process" (Aug. 3, 2026), <https://insidelines.pjm.com/over-700-new-generation-projects-accepted-into-first-cycle-of-reformed-interconnection-process/>.

²⁹ PJM, Cycle Timeline, <https://www.pjm.com/planning>.

prompt identification of deficiencies, the opportunity to cure those deficiencies, and a review process that is grounded in identified standards, PJM's withdrawal of the Project violates Section 205 of the Federal Power Act.

Notwithstanding Oklo's objections to PJM's conduct, Oklo is prepared to remedy the alleged deficiencies in the June 24 NextGen Comments. The DMDG report and checklist requested by PJM is an administrative requirement that Oklo has on hand. Each of the three data deficiencies flagged by PJM are similarly readily correctable with an updated data submission. Finally, the stability issue that PJM flagged only arose because Oklo was not aware that PJM was fault-testing the entire facility. Oklo is prepared to submit an updated model demonstrating that the entire facility, including both synchronous and inverter-based resources, can withstand a fault test. There is no reason to exclude the Project based on alleged deficiencies that, despite being unjustified, Oklo is prepared to remedy.

A. PJM Conducted its Review of the Project in an Unjust, Unreasonable, and Unduly Discriminatory Manner.

PJM's review of the Project was unjust and unreasonable because it departed from PJM's tariff requirements to flag deficiencies promptly and allow Applicants an opportunity to cure. PJM's tariff requires it to exercise "Reasonable Efforts" to inform an Applicant of deficiencies in its Application within fifteen business days of the Application Deadline, after which an Applicant has ten business days to cure the deficiency.³⁰ The only such notice Oklo received was PJM's May 15 Deficiency Notice, delivered by email fourteen business days after the application deadline.³¹ Oklo promptly responded to cure the identified deficiencies ahead of the ten-business-

³⁰ PJM Tariff, Part VIII.B, § 403 ("Application Rules") (0.10), § B.1.

³¹ PJM, Cycle Timeline, <https://www.pjm.com/planning> (identifying April 27, 2026 as the Application Deadline for Cycle 01).

day deadline. In contrast, PJM's June 24 NextGen Comments did not comply with PJM's enumerated process.

PJM's June 24 NextGen Comments were uploaded 41 business days after the Application Deadline (26 business days after PJM's window to raise deficiencies). These comments were not updates to previously flagged deficiencies. Four out of the five issues addressed topics that PJM could have flagged on the initial review but did not. The fifth issue, failure to re-issue a DMDG report and checklist, is a ministerial administrative requirement that Oklo had already provided on its first submission and could have easily re-generated had it known that PJM wanted an updated copy. Further, the issues flagged in the June 24 NextGen Comments were not presented as official deficiencies; at best, they were informal comments from a PJM reviewer noting *potential* deficiencies.³² It is not clear why PJM did not formalize those comments into confirmed deficiencies and notify Oklo of them, but the net result is that PJM failed to satisfy its obligation to "inform Applicant of Application deficiencies within 15 Business Days after the Application Deadline,"³³ and deprived Oklo of a meaningful opportunity to cure the alleged deficiencies. Even if PJM had given Oklo formal notice that the issues noted in the June 24 NextGen Comments were confirmed deficiencies from PJM's perspective, giving Oklo a chance to cure those deficiencies would not have constituted giving Oklo a "second bite of the apple." The issues noted in the June 24 NextGen Comments were new issues that PJM failed to flag in its Tariff-required deficiency review window.

³² See Attach. J at 1 ("Reactive capability for the fuel cell units appears to not line up with Round 1 dynamic model report PQ curve. ... *Please check.*" (emphasis added)); *id.* ("The developer *should check* the dynamic model parameters and test the SMIB case to ensure it remains stable for such scenario." (emphasis added)).

³³ PJM Tariff, Part VIII.B, § 403(B)(1)(a).

Pursuant to PJM's tariff,³⁴ Oklo was entitled to a meaningful opportunity to cure each of these deficiencies, but PJM's failure to effectively communicate its concerns deprived Oklo of that opportunity. PJM's decision to treat reviewer comments in NextGen as formal deficiency determinations without email confirmation to the Applicant stands in stark contrast to its established deficiency notice process. PJM delivered both its May 15 Deficiency Notice and its June 9, 2026 question about the Project's single line diagram via email. Oklo promptly responded to those emails and attempted to confirm via email that it had addressed all of PJM's concerns. Instead of continuing those email communications or notifying Oklo that it was flagging new concerns using a different process, PJM reviewers entered their subsequent comments into NextGen without any notification to Oklo—and then, after the ninety-day Application Review Phase lapsed,³⁵ PJM deemed the potential issues behind those comments to be formal deficiencies warranting withdrawal of the Project. PJM's decision to withdraw the project based on the June 24 NextGen Comments violates the Tariff both because PJM was untimely in flagging the new deficiencies and because PJM failed to give Oklo a meaningful opportunity to cure. As a result, PJM deprived Oklo of meaningful notice and opportunity to cure, an opportunity PJM afforded to other Applicants, and ultimately applied a process to the Project that is unjust, unreasonable, and unduly discriminatory in violation of the Federal Power Act ("FPA").

³⁴ PJM Tariff, Part VIII.B, § 403, § B.1 ("Applicant then has 10 Business Days to respond to a Transmission Provider's deficiency determination.").

³⁵ *Id.*, § B.3 ("Transmission Provider will only review an Application during the Application Review Phase following the Application Deadline for which the Application was submitted and deemed complete, which will extend for 90 days or the amount of time it takes to complete all Application review activities for the relevant Cycle, whichever is greater.").

B. PJM's Application of an IBR-Specific Stability Standard to the Mixed Technology C01-1735 Project Violates PJM's Own Guidelines and Has No Basis in PJM's Tariff.

PJM violated Section 205 of the FPA by deviating from its guidelines and by applying a condition of service that has no basis in its tariff. PJM's DMDG require inverter-based resources to submit a low voltage ride-through test to demonstrate stability.³⁶ Oklo, therefore, submitted a model demonstrating the low voltage ride-through capability of the Project's inverter-based resource, *i.e.*, the fuel cell. For its initial submission on April 27, 2026, Oklo built and submitted a voltage ride through model demonstrating dynamic stability for the voltage ride through test on the fuel cell only (as the sole IBR). In response to that submission, PJM identified a momentary cessation deficiency.³⁷ Oklo promptly cured that deficiency by resubmitting the voltage ride-through model demonstrating no momentary cessation.³⁸ The DMDG report (dated April 24, 2026) that Oklo provided to PJM in its original submission clearly states—and the data plots show—that the voltage ride through test was performed with fuel cells only, not the full 750 MW facility.³⁹ This was not flagged by PJM as a deficiency in response to the DMDG report or in the data plots, even though it was obviously, explicitly reviewed by PJM given that PJM identified and commented on the momentary cessation in the initial submission.

³⁶ PJM, Dynamic Model Development Guidelines for Interconnection Analysis, § 7.4 (“*For inverter-based resources* a three-phase fault is applied at the POI for 9 cycles. The fault is cleared without the loss of any elements. The results of the VRT test shall show *the unit(s) does not trip*, the real and reactive power recovers to the prefault value.” (emphasis added)) (“DMDG”); *see also id.*, § 8 (“Verify that all testing requirements are met. Must provide: ... (e) Results for the VRT test including log, out and test plots showing Power, VARs, Eterm, Freq and Volt *for each inverter(s)*. Provide confirmation that Momentary Cessation is eliminated (if not, provide reason).” (emphasis added)).

³⁷ Attach. E at 1.

³⁸ Compare Attach. L (the data plots .pdf file, which includes plots of real and reactive power, terminal voltage, terminal current, and frequency, that Oklo submitted in the dynamic file upload section of NextGen on April 27) with Attach. M (the data plots .pdf file Oklo resubmitted to demonstrate that it had cured the momentary cessation).

³⁹ Found Digital, Oklo – [REDACTED] Project ID# C01-1735 750MW Generation Plant PSSE Modeling and Results, at 42, included as Attach. N (April 24, 2026) (“PSSE Modeling and Results”); Attach. L (initial data plots); Attach. M (resubmitted data plots).

Despite not raising a concern in response to the initial submission or in response to Oklo's cure, PJM ultimately found the Project deficient because it did not demonstrate low voltage ride-through capability for the *entire* facility. That determination is inconsistent with the plain language of the DMDG, which requires low voltage ride-through tests only for inverter-based resources. Oklo demonstrated that—and did so by submitting modeling that most accurately represented the fuel cell's ride-through capability, *i.e.*, it modeled the IBR ride-through capability without contributions from the natural gas and nuclear units. Further, had Oklo included the natural gas and nuclear units in its IBR low voltage ride-through test, Oklo believes the results would have obscured the fuel cell's actual ride-through capability.

Despite the DMDG's seemingly straightforward IBR-focused low voltage ride-through requirement, PJM applied a different rule when it reviewed the Project's application. PJM's assertion that the Project must pass a low voltage ride-through test for the entire facility appears nowhere in PJM's tariff or guidelines. Oklo asserts that it complied with the DMDG by demonstrating the ride-through capability of its fuel cells, and cured all properly identified deficiencies enumerated in PJM's May 15 Deficiency Notice. Further, had PJM communicated to Oklo that the potential issues the PJM reviewer noted in the June 24 NextGen Comments were, in fact, formal deficiencies, Oklo could have swiftly cured those alleged deficiencies—and still stands ready to do so today.

The broad caveat that the DMDG “may not cover every specific scenario” and “unique scenarios or settings... shall be ... brought to the attention of PJM” does not help PJM.⁴⁰ Rather, that language should be read to indicate that the DMDG provides the opportunity for project-

⁴⁰ PJM, DMDG, § 2.

specific guidance of the type the Project required, but did not receive, here. That is, in the face of the Project’s “unique scenario [and] settings,” PJM should have accepted Oklo’s DMDG-compliant fuel cell ride-through demonstration while applying its typical treatment for synchronous units (*i.e.*, no ride-through requirement)—which Oklo believes it satisfied through its main dynamic model.⁴¹ And, to the extent PJM needed to perform voltage ride through testing on the main dynamic model, instead of the IBR-only model that Oklo prepared for the voltage ride through testing, to simultaneously confirm the fuel cell’s ride through capacity and the stability of the natural gas and nuclear units, it should have clearly communicated that to Oklo.. In its limited discussions with PJM about the project, Oklo raised that the Project included fuel cells, an inverter-based resource, which PJM’s NextGen software erroneously treated as a synchronous resource. When directing Oklo to implement a workaround, PJM could have easily specified that the Project’s multi-technology configuration required a different test requirement than was contained in the DMDG. PJM did not do so.

Rather than proactively, or even reactively, engage with Oklo on how to apply the DMDG to the multi-technology Project, PJM chose to require *sub silentio* a low voltage ride-through test to the Project’s synchronous generators. Oklo asserts that PJM’s attempt to impose such a standard in this situation violates the rule of reason. The rule of reason gives effect to the FPA requirement that “all rates and charges” for any Commission-jurisdictional transmission or sale as well as “the classifications, practices, and regulations affecting such rates and charges” be filed with the Commission.⁴² This requirement of Section 205 “ensure[s] that the public has adequate notice of

⁴¹ Oklo provided a dynamic model that included all units—advanced nuclear, natural gas, and fuel cell—and a separate dynamic model with the synchronous units disabled to demonstrate the fuel cell’s IBR ride-through capability.

⁴² 16 U.S.C. § 824d(c).

the proposed rate, and that the Commission has an opportunity to evaluate the proposal to ensure that it is just and reasonable and not unduly discriminatory or preferential.”⁴³ The rule of reason therefore mandates that public utilities’ tariffs include all practices that (1) “affect rates and service *significantly*,” (2) “are realistically *susceptible* of specification,” and (3) “are not so generally understood in any contractual arrangement as to render recitation superfluous.”⁴⁴

Data requirements for multi-fuel type interconnection requests easily meet that standard. First, the interconnection process is the gateway to the service under the PJM tariff. Rules governing that process for multi-fuel type generators affect rates and service not only “significantly,” but fundamentally. Second, PJM has already determined that the data requirements for interconnection requests are “susceptible of specification” because PJM already specifies those requirements for other fuel types, including inverter-based resources. Third, the alleged requirement to conduct a low voltage ride-through test for multi-fuel type interconnection requests is not “so generally understood . . . as to render recitation superfluous.”⁴⁵ This dispute arose based on a disagreement over the terms governing multi-fuel type resources. The specific requirement to conduct a facility-wide low voltage ride-through test on a resource like the Project is far from “generally understood.” PJM’s attempt to require the Project to comply with a standard that appears nowhere in PJM’s Tariff or guidelines violates both the identified standards in PJM’s DMDG and the rule of reason requirement to specify rates and charges for Commission-jurisdictional transactions.

⁴³ *Sw. Power Pool, Inc.*, 182 FERC ¶ 61,100, at P 34 (2023).

⁴⁴ *City of Cleveland v. FERC*, 773 F.2d 1368, 1376 (D.C. Cir. 1985). Nevertheless, a tariff need not include “mere implementation details” and “specifiable practices that significantly affect rates need not be included if they are clearly implied by the tariff’s express terms.” *Hecate Energy Greene Cnty. 3 LLC v. FERC*, 72 F.4th 1307, 1312, 1314 (D.C. Cir. 2023).

⁴⁵ *City of Cleveland*, 773 F.2d at 1376.

III. Requested Relief

For the aforementioned reasons, Oklo respectfully requests that the Commission (1) find that PJM violated its Tariff and DMDG requirements in processing the Project's Cycle 01 Application, (2) direct PJM to immediately reinstate the Project's Cycle 01 Application with its original queue position, and (3) grant such waivers as the Commission deems necessary to effectuate the Project's inclusion in Cycle 01 with minimal disruption and delay.

With respect to waivers that may be necessary to reinstate the Project's application, Oklo submits that the Commission may grant waiver of the requirement in Part VIII.B, Section 403 of PJM's tariff that PJM post its Phase I Base Case Data thirty days prior to the initiation of Phase I.⁴⁶ Good cause exists to grant this waiver.⁴⁷ When evaluating such requests, the Commission considers whether "(1) the applicant acted in good faith; (2) the waiver is of limited scope; (3) the waiver addresses a concrete problem; and (4) the waiver does not have undesirable consequences, such as harming third parties."⁴⁸ Granting waiver to provide relief under these circumstances satisfies all four requirements. First, as discussed at length above, Oklo has taken great care to support PJM's review of the Project, responding promptly to all notified concerns and

⁴⁶ PJM Tariff, Part VIII.B, § 403, § B.1 ("During the Application Review Phase, and at least 30 days prior to initiating Phase I of the Cycle, Transmission Provider will post the Phase I Base Case data for review, subject to CEII protocols."); *see also id.*, Part VIII.C, § 405 ("Phase I") (0.1.0), § A.1.b.i ("Phase I shall start on the first Business Day immediately following the end of the Application Review phase, but no earlier than 30 days following the distribution of the Phase I Base Case Data."). To be clear, Oklo does not concede that waiver is necessary to provide relief in this situation. Because PJM has violated its Tariff in withdrawing the Project and omitting it from the Cycle 01 model, PJM's Cycle 01 model necessarily is erroneous and afflicted by PJM's legal error. The Commission may choose to correct that legal error without granting waiver. However, Oklo is including in its request for relief a request for such waivers as the Commission deems appropriate, in case the Commission determines that waiver is necessary or appropriate to provide the request for relief while minimizing disruption to Cycle 01.

⁴⁷ The Commission has granted waiver of market operators' interconnection queue requirements, including timing requirements, for good cause. *See, e.g., Grover Hill Wind, LLC*, 174 FERC ¶ 61,240 (2021) (granting a waiver of a procedural deadline in PJM's interconnection process to enable a project that failed to meet a deadline for reasons outside of its control to be reinstated in the interconnection queue).

⁴⁸ *See, e.g., Hickory Run Energy, LLC*, 168 FERC ¶ 61,094, at P 18 (2019) (citing *Midcontinent Indep. Sys. Operator, Inc.*, 154 FERC ¶ 61,059, at P 13 (2016)).

collaborating with PJM to address technical questions, acting in good faith at every stage of the process. Second, a waiver of the 30-day posting requirement is of limited scope; Oklo is not seeking an open-ended waiver, but rather a limited waiver of one data posting requirement to allow PJM to provide relief in a manner that minimizes disruption and delay for Cycle 01. Third, the waiver addresses the concrete problem of allowing PJM to reinstate the Project into Cycle 01 after correcting its unlawful withdrawal of the Project. The waiver allows the Commission to correct PJM's unjust and unreasonable conduct without creating unnecessary delays to the study process. Fourth, the waiver would minimize undesirable consequences, including harm to third parties, by avoiding delays to other Cycle 01 Applicants and putting them in the same position as they would have been had the Project's Application not been erroneously withdrawn.

IV. Request for Fast Track Processing

Pursuant to Rule 206(h) of the Commission's Rules of Practice and Procedure,⁴⁹ Oklo requests fast track processing. The issues in this complaint are urgent; the Commission's action will determine not only whether C01-1735 will be included in PJM's Cycle 01 study but also how quickly PJM can commence its Phase I System Impact Study for Cycle 01. PJM's tariff requires that Phase I start "on the first Business Day immediately following the end of the Application Review phase, but no earlier than 30 days following the distribution of the Phase I Base Case Data."⁵⁰ PJM has announced that it plans to post the Phase I model on August 28, 2026 and to begin Phase I on September 28, 2026.⁵¹ Expeditious resolution of these issues is needed to

⁴⁹ 18 C.F.R. § 385.206(h).

⁵⁰ PJM Tariff, Part VIII.C, § 405 ("Phase I") (0.1.0), § A.1.b.i ("Phase I shall start ... no earlier than 30 days following the distribution of the Phase I Base Case Data."); *id.*, Part VIII.B, § 403 ("Application Rules") (0.1.0), § B.4 ("During the Application Review Phase, and at least 30 days prior to initiating Phase I of the Cycle, Transmission Provider will post the Phase I Base Case data for review, subject to CEII protocols.").

⁵¹ PJM, Cycle Timeline, <https://www.pjm.com/planning>.

minimize disruption to PJM's Cycle 01 caused by PJM's unlawful withdrawal of the Project and allow PJM's Phase I study to proceed with minimal delay. Accordingly, Oklo respectfully requests that the Commission should expeditiously grant this Complaint and reinstate the Project into Cycle 01 no later than September 21, 2026.

V. Motion for Shortened Comment Period

Pursuant to Rules 206(f) and 212 of the Commission's Rules of Practice and Procedures,⁵² Oklo requests that the Commission require PJM to answer the Complaint on an expedited basis by September 4, 2026. To ensure timely adjudication of this Motion, Oklo requests a shortened period to answer this Motion, with comments on the Motion due no later than August 31, 2026. PJM is acutely aware of the issues raised in the Complaint as Oklo has attempted to resolve issues through the dispute resolution process under PJM's Tariff prior to submitting this Complaint. The shortened comment period will ensure that all interested parties have an opportunity to develop the record in this proceeding while providing the Commission with sufficient time to issue an order on an expedited timeline.

VI. Compliance with Rule 206 Requirements

As required by Rule 206(b) and Rule 206(c),⁵³ Complainants provide the following information.

1. Sections 206(b)(1), (2) – Identification of Violation of Regulatory Requirement and Explanation of Violation

See supra, Section II. PJM has unlawfully administered its interconnection process with respect to the Project and unjustifiably withdrawn the Project from PJM's Cycle 01.

⁵² 18 C.F.R. §§ 385.206(f), 385.212.

⁵³ 18 C.F.R. §385.206(b)(1)-(10), (c).

2. Sections 206 (b)(3)-(5) – Business, Commercial, Economic, or Other Issues Presented, the Financial Impact, and the Practical/Operational Impact

Oklo estimates that excluding the Project from PJM's Cycle 01 study will cause, at minimum, a 14-month delay,⁵⁴ [REDACTED]

[REDACTED] and significantly increase the Project's development costs, which will have an adverse financial impact on both the Project and [REDACTED]. Direct costs associated with project delay include the costs of new study deposits, annual payments to maintain site control, and other carrying costs such as employee time.

3. Section 206(b)(6) – Related Proceedings

Oklo is aware of a complaint filed by Advantage Capital Renewables, LLC in Docket No. EL26-99-000 alleging that PJM's withdrawal of an energy storage project from Cycle 01 was impermissible.

4. Section 206(b)(7) – Specific Relief Requested

See supra, Section III. Oklo requests that the Commission order PJM to find that PJM has unlawfully withdrawn the Project and direct PJM to immediately reinstate the Project into its Cycle 01 study.

5. Section 206(b)(8) – Documents that Support the Complaint

All documents supporting the facts of this complaint are indicated in or attached to this complaint. The following documents are attached hereto:

- Attachment A: [REDACTED] (Confidential)

⁵⁴ PJM, Cycle Timeline, <https://www.pjm.com/planning> (identifying the final agreement negotiation end date as 5/19/2028 for Cycle 01 and 7/13/2029 for Cycle 02).

- Attachment B: [REDACTED] (Confidential)
- Attachment C: April 27 NextGen Receipt
- Attachment D: May 2 NextGen Confirmation
- Attachment E: May 15 Deficiency Notice
- Attachment F: Deficiency Correspondence
- Attachment G: Single Line Diagram Correspondence
- Attachment H: June 18 Data Change Notice
- Attachment I: Kickoff Call Correspondence
- Attachment J: Withdrawal Notice
- Attachment K: Reinstatement Request Correspondence
- Attachment L: Data Plots (Pre-Cure) (Confidential)
- Attachment M: Data Plots (Pre-Cure) (Confidential)
- Attachment N: PSSE Modeling and Results (Confidential)
- Attachment O: Form of Protective Order and Non-Disclosure Certificate
- Attachment P: Form of Notice

6. Section 206(b)(9) – Dispute Resolution

Oklo has made every effort to resolve this dispute outside of the formal complaint process. Oklo invoked dispute resolution under Part VIII.E, Section 419 of the PJM Tariff but has been unable to resolve the dispute with PJM through that dispute resolution process. Given the urgency of the issues raised by this Complaint and the timeline of the Cycle 01 process, Oklo believes this Section 206 filing is necessary to resolve the dispute.

7. Section 206(b)(10) – Form of Notice

In accordance with the Commission's rules, a form Notice of Filing suitable for publication in the federal register is submitted with this filing.

8. Rule 206(c) Service on Respondent

In accordance with Rule 206(c),⁵⁵ concurrent with its filing with the Commission, Oklo is serving copies of this Complaint by email on the contacts for PJM as listed on the Commission's list of Corporate Officials:

Jessica M. Lynch
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
Telephone: (267) 563-3688
Email: FERCeService@pjm.com

Mark J. Stanisz
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
Telephone: (610) 666-4707
Email: FERCeService@pjm.com

VII. Correspondence and Communications

Correspondence regarding this filing should be sent to the following individuals, who should be placed on the official service list in this proceeding⁵⁶:

⁵⁵ 18 C.F.R. § 385.206(c).

⁵⁶ Oklo requests waiver of 18 C.F.R. § 385.203(b)(3) to the extent necessary to include more than two individuals on the official service list.

Vivek Narayanadas
General Counsel
Oklo Inc.
3190 Coronado Dr.
Santa Clara, CA
vivek@oklo.com

Nicholas Gladd
Matthew Christiansen
Sarah Greenberg
Katie Mansur
Wilson Sonsini Goodrich & Rosati
1700 K Street NW
Fifth Floor
Washington, DC 20006
(617) 598-7871
(202) 431-5231
ngladd@wsgr.com
mchristiansen@wsgr.com
sgreenberg@wsgr.com
cmansur@wsgr.com

Counsel for Oklo Inc.

VIII. Conclusion

For the foregoing reasons, Oklo respectfully requests that the Commission grant the relief requested in this emergency complaint and grant its Request for Fast Track Processing.

Respectfully submitted,



Nicholas Gladd
Matthew Christiansen
Sarah Greenberg
Katie Mansur
Wilson Sonsini Goodrich & Rosati
1700 K Street NW
Fifth Floor
Washington, DC 20006
(617) 598-7871
(202) 431-5231
ngladd@wsgr.com
mchristiansen@wsgr.com
sgreenberg@wsgr.com
cmansur@wsgr.com

Dated: August 27, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service lists compiled by the Secretary of the Commission in these proceedings.

Dated: August 27, 2026

Washington, D.C.

/s/ Katie Mansur

Katie Mansur
Wilson Sonsini Goodrich & Rosati
1700 K Street NW
Fifth Floor
Washington, DC 20006

Attachment A

[Redacted In Its Entirety]

Attachment B

[Redacted In Its Entirety]

Attachment C



Will Chung <will.chung@oklo.com>

NextGen - Project data for [REDACTED] has been received (C01-1735) - Additional steps may be required to complete application

1 message

NextGen <nextgen-donotreply@pjm.com>
To: mike@oklo.com, will.chung@oklo.com
Cc: ipadmin@pjm.com

Mon, Apr 27, 2026 at 12:12 PM

Thank you for submitting your project data, signed agreement, and deposit information. PJM will review the application for completeness and will respond if we have any questions.

If letters of credit were submitted, please send the original signed letters of credit to:

PJM Interconnection, LLC
2750 Monroe Boulevard
Audubon, PA 19403
Attn: Interconnection Projects

The application is not considered complete until the signed agreement, deposits, and site control are received and deemed acceptable by PJM. Complete applications will be reviewed at the close of the cycle application phase.

Track your submission's progress on the [Projects](#) tab: Project ID: C01-1735.

Information about the interconnection process that may affect your project is regularly discussed at the [Interconnection Process Subcommittee \(IPS\)](#).

Project Developers can also find training videos on the interconnection process on the [PJM Training Resources](#) page under the "Planning" section.

If you have questions or concerns, please contact our Interconnection Projects Department at IPAdmin@pjm.com

Note: This is an auto-generated email. Do not reply to this email.

Attachment D



Will Chung <will.chung@oklo.com>

NextGen - New Service Request for [REDACTED] has been submitted (C01-1735) - No further action required

1 message

NextGen <nextgen-donotreply@pjm.com>

Sat, May 2, 2026 at 1:47 PM

To: mike@oklo.com, will.chung@oklo.com

Cc: ipadmin@pjm.com, joshua.stephenson@pjm.com

PJM has reviewed your application for Project ID [C01-1735](#) and no further action is needed at this time. After the close of the Application Deadline, PJM will begin the application review phase to determine the validity of such submitted applications, beginning with a deficiency review.

Additional Comments: None

Track your submission's progress on the [Projects](#) tab: Project ID: C01-1735

Information about the interconnection process that may affect your project is regularly discussed at the [Interconnection Process Subcommittee \(IPS\)](#).

Training videos on the interconnection process are available on the [PJM Training Resources](#) page under the "Planning" section.

If you have questions or concerns, please contact our Interconnection Projects Department at IPAdmin@pjm.com.

Note: This is an auto-generated email. Do not reply to this mail.

Attachment E

Kelsey Laabs <kelsey@oklo.com>

Fwd: NextGen - PJM requests additional information for [REDACTED] - C01-1735

Will Chung <will.chung@oklo.com>
To: Kelsey Laabs <kelsey@oklo.com>

Thu, Aug 27, 2026 at 3:27 PM

----- Forwarded message -----

From: **NextGen** <nextgen-donotreply@pjm.com>
Date: Fri, May 15, 2026 at 1:43 PM
Subject: NextGen - PJM requests additional information for [REDACTED] - C01-1735
To: <mike@oklo.com>, <will.chung@oklo.com>
Cc: <ipadmin@pjm.com>, <joshua.stephenson@pjm.com>

PJM requests additional information about the data provided for C01-1735 - [REDACTED]

Please log into NextGen to address all comments or provide additional information within 10 business days (by close of business on 06/01/2026).

Any request for which a Project Developer or Eligible Customer has not provided satisfactory responses within 10 business days shall be deemed to be terminated and withdrawn. When you access your application, the section(s) containing comments will be marked in the left navigation.

To proceed, please address all comments within the application, including the additional comments listed below, before resubmitting. Please contact your PJM Project Manager ([Josh Stephenson](#)) with any project-specific questions.

The deficiency comments provided below are not intended to be exhaustive and reflect only the most recent comment for each field. Applicants are responsible for reviewing each deficient field in NextGen and addressing all associated comments to ensure a complete and satisfactory cure.

Transformer Information

Low-side: [MEPPI-Jones] Short Circuit: NextGen Fuel Cell terminal voltage (480V) does not match associated step-up transformer low-side nominal voltage (13.8 kV) Please review and update.

High-side: MPT winding configurations don't meet power transformer requirement for Dominion. Please verify and update.

Low-side: [MEPPI-Jones] Short Circuit: NextGen Fuel Cell terminal voltage (480V) does not match associated step-up transformer low-side nominal voltage (13.8 kV) Please review and update.

Generator Information

Machine ID: You have selected a generator type of Solar, but indicated it is a fuel cell. You will need to remove this generator and add a new one with the correct type of Fuel Cell.

Machine ID: You have selected a generator type of Solar, but indicated it is a fuel cell. You will need to remove this generator and add a new one with the correct type of Fuel Cell.

MVA base: [MEPPI-Jones] Short Circuit: Please update value to per inverter.

MVA base: [MEPPI-Jones] Short Circuit: Please update value to per inverter.

Project Capability

Capacity contract type: Is there a contract in place for supplying this project with natural gas? If not, will there be? If yes, when will that contract be in place?

Dynamic File(s): [MEPPI-Jones] Stability:

- 1) Please add Winding Nominal kV to the Nuclear STG GSU's in PSSE.
- 2) Fuel Cell's PSSE model REGCB CON (J+6) and REECD CON (J+27), I_{max} setting is higher than typical. Please review and update as needed.
- 3) Fuel Cell's PSSE model REECD CON (J+1) VUP as provided is atypical. Please check and correct if needed
- 4) Fuel Cell's PSSE model REECD CON (J+5) KQV which is provided as 0. This is usually a positive number. Correct if needed.
- 5) Fuel Cell's appeared to enter Momentary Cessation during the voltage ride thru test. Check REECD CON (J+74) and CON (J+75) settings. Please review and update.
- 6) For all generators using PSSE model GENTPJ1 typically X^q = X^d but these do not match in the dynamic case.

Single line diagram: [MEPPI-Jones] Short Circuit:

- 1) Please include generators MVAbase and transformer winding configuration in the single line diagram.
- 2) Please provide a detailed engineering single line diagram to show, including but not limited to, the layout of inverters, step up transformers, and other associated parameters for the Fuel Cell phase 1.

Generating Facility Information

Longitude: These coordinates should correspond to the location of the collector substation. Please confirm or update.

Latitude: These coordinates should correspond to the location of the collector substation. Please confirm or update.

Point of Interconnection

Latitude: Please update these coordinates to the tap location along the transmission line.

Substation A PSS/e Bus #: Possum Point 500 kV is 314922. Please populate.

Substation B PSS/e Bus #: Ladysmith 500 kV is 314911. Please populate.

Total length of line: PJM shows the length of this line is 47.56 miles. Please update this value and the mileages from substation A and B accordingly.

Distance from POI to substation A: PJM shows the length of Possum Point - Ladysmith 500 kV line is 47.56 miles. Please update the distance from substation A accordingly.

Distance from POI to substation B: PJM shows the length of Possum Point - Ladysmith 500 kV line is 47.56 miles. Please update the distance from substation B accordingly.

Longitude: Please update these coordinates to the tap location along the transmission line.

Site Control & Supporting Docs

Site Plan: Please add pins/geometry to identify the location of the Point of Interconnection and collector substation.

Additional Comments:

[05/15/2026 PJM-RDO]: Short Circuit data is deficient. Please verify and update.

[MEPPI-Jones] Stability:

1) The single line diagram shows two 500 kV transmission lines leaving the generating facility. Is the second line future?

2) Per PJM's DMDG the PSSE cases should initialize without any DSTATE errors or suspect initial conditions. When initializing the full project facility with all generators turned on as provided in [REDACTED] sav there are a lot of suspect initial conditions. Initializing synchronous machines alone resulted in only excitation limiter models listed as suspect. Initializing inverter-based resources only resulted in all renewable models listed as suspect. Please review and update.

5/15/2026 (LF-KJC): Load flow data deficient. The POI mileage needs to be clarified and the fuel cells need to be submitted as fuel cells instead of solar.

Legal Comments: None

Thank you,

PJM Planning

Note: This is an auto-generated email. Do not reply to this email.

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Will Chung

Sr. Director, Grid Integration Strategy | Oklo

(714) 423-1799 | will.chung@oklo.com

Attachment F



Will Chung <will.chung@oklo.com>

C01-1735 - Deficiencies**Stephenson, Joshua** <Joshua.Stephenson@pjm.com>

Tue, May 26, 2026 at 8:58 AM

To: Grant Wollam <gwollam@founddigitalllc.com>

Cc: Will Chung <will.chung@oklo.com>, Trevor Curry <trevor.curry@oklo.com>

Grant,

We discussed your concerns regarding the Fuel Cell data fields and agree changes are need to the form, but they will not be available in the near term. The generator type will need to be changed to "Fuel Cell" as the election impacts other systems. To address the deficiencies, please fill out any fields that pertain to the project and enter "0" for the rest. You can manually add all of the inverter details from the first image to the 'Additional comments related to above configuration' field highlighted in the second image.

Machine ID *	Generator subcategory *
Fuel Cell 1	Fixed
Manufacturer *	Model number
Bloom Energy	INV-750
Model name *	Version number
AC7	
MW value per inverter (Nominal rating) *	Number of identical inverter(s) *
0.300 MW	560
MVA base *	Terminal Voltage *
198.800000 MVA	0.480000 kV
Maximum fault current output from the inverter * ⓘ	Requested CIRs *
1.500000 p.u.	150.00 MW

Additional comments related to above configuration

Thanks,

Josh

From: Stephenson, Joshua**Sent:** Tuesday, May 19, 2026 4:31 PM**To:** 'Grant Wollam' <gwollam@founddigitalllc.com>**Cc:** Will Chung <will.chung@oklo.com>; Trevor Curry <trevor.curry@oklo.com>**Subject:** RE: C01-1735 - Deficiencies

Hi Grant,

We are looking into number 3. The due date for the comments is specified in Nextgen on the project tab and in the email that was sent – close of business June 1, 2026. The additional comments stating the Short Circuit review is deficient in for awareness. By resolving the red deficiency flags in the application you will be addressing the short circuit feedback.

Here is Dominion's standards:

This is Dominion's requirement for MPT <https://www.pjm.com/-/media/DotCom/planning/plan-standards/private-dominion/facility-connection-requirements1.ashx?la=en>

3.2 Interconnection Generator Step-up Transformer Requirements

The Customer-interconnected generation step-up transformer (GSU) is required to provide a source of zero sequence current to the transmission system, aiding in ground fault detection. The utility side of the GSU will be effectively grounded to prevent an excessive increase in voltage during single-phase to-ground faults. A GSU that can pass but is not a source of zero sequence current is only appropriate if a ground source is present on the medium voltage terminal and will require evaluation prior to permission being granted. The interconnected GSU will be protected using dual high-speed current differentials.

The following transformer configurations are commonly used to meet the above requirements:

- Utility-side-grounded wye, generator-side-**delta** (typical for synchronous generation).
- Utility-side-grounded wye, generator-side-grounded wye, delta on the tertiary (typical for inverted-based generation).

Thanks,

Josh

From: Grant Wollam <gwollam@founddigitalllc.com>

Sent: Monday, May 18, 2026 10:30 AM

To: Stephenson, Joshua <Joshua.Stephenson@pjm.com>

Cc: Will Chung <will.chung@oklo.com>; Trevor Curry <trevor.curry@oklo.com>

Subject: C01-1735 - [REDACTED] Deficiencies

External Email! Think before clicking links or attachments.

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Hi Joshua,

I am working on resolving the deficiencies for the C01-1735 - [REDACTED] PJM generation application. I had the following questions:

1. What date are the deficiencies required to be resolved by?
2. Can you confirm that the transformers should be Wye-grounded / Wye-grounded per Dominion Energy requirements? I previously had Delta / Wye-grounded.
3. I originally tried to input the Fuel Cell data as a Fuel Cell in NextGen, but the parameters allowed for entry were identical to a synchronous generator, so they did not make sense for a fuel cell (IBR). The closest option was a solar generator, so that is how I entered them. This has still not been fixed in NextGen. The Fuel Cell option needs to be fixed in NextGen to be reflective of an inverter-based resource like a Fuel Cell, or the parameters I enter will not make any sense (for example, a fuel cell has no value for generator inertia-H). If not, please advise on how I should proceed.
4. Under Additional comments - "Short Circuit Data is Deficient" - can you clarify where this needs to be updated and what it is for? Equipment, PSSE, NextGen application, etc.

Best Regards,



Grant Wollam, PE

Senior Power Systems Engineer

M: (229) 869-7067

E: gwollam@founddigitalllc.com

FoundDigital LLC

Registered Office: 5511 Parkcrest Dr., Suite 103, Austin, TX 78731

Attachment G

Re: C01-1735 - [REDACTED] Deficiencies**gwillam@founddigitalllc.com Grant Wollam**

Wednesday, June 10, 2026 at 12:35:39 PM Pacific Daylight Time

To: Kyle.Copeland@pjm.com Copeland, Kyle

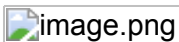
Cc: Joshua.Stephenson@pjm.com Stephenson, Joshua, Jonathon.Affleck@pjm.com Affleck, Jonathon, Anisha.Fernandes@pjm.com Fernandes, Anisha, Shekhar.Awasthi@pjm.com Awasthi, Shekhar R, Rizki.DelOlmo@pjm.com Del Olmo, Rizki, will.chung@oklo.com will.chung@oklo.com, trevor.curry@oklo.com trevor.curry@oklo.com, rbath@founddigitalds.com Robert Bath

Hi Kyle,

We have decided to update the project's configuration to include just the one utility owned switchyard which would connect to the customer owned substations. This updated SLD is attached for PJM's review. Please let us know if you have any further questions on this.

This does not impact the dynamic modeling files or attachment line impedance, so this is the only change. At this point, I do not see an option to update this in NextGen directly. Let me know if action is required there.

Best Regards,

**Grant Wollam, PE**

Senior Power Systems Engineer

M: (229) 869-7067**E:** gwillam@founddigitalllc.com**FoundDigital LLC**

Registered Office: 5511 Parkcrest Dr., Suite 103, Austin, TX 78731

From: Copeland, Kyle <Kyle.Copeland@pjm.com>**Date:** Tuesday, June 9, 2026 at 2:01 PM**To:** Grant Wollam <gwillam@founddigitalllc.com>**Cc:** Stephenson, Joshua <Joshua.Stephenson@pjm.com>; Affleck, Jonathon <Jonathon.Affleck@pjm.com>; Fernandes, Anisha <Anisha.Fernandes@pjm.com>; Awasthi, Shekhar R <Shekhar.Awasthi@pjm.com>; Del Olmo, Rizki <Rizki.DelOlmo@pjm.com>; will.chung@oklo.com <[REDACTED]@oklo.com>; trevor.curry@oklo.com <trevor.curry@oklo.com>**Subject:** RE: C01-1735 - [REDACTED] Deficiencies

Hi Grant and thank you for the email. I understand that Oklo does not intend to be a Transmission Owner.

PJM does not have a load or co-located load queue at this time. The C01-1735 request is only for studying the generation portion of the project and all that is required for the generation interconnection.

In regards to the 500 kV substations, PJM and Dominion ultimately need to know the final requested configuration for the generation interconnection. If this includes the 500 kV switching station and the 500 kV intermediate switching station, PJM will proceed with the information as submitted and include the connections that are needed for the generation. If Oklo wishes to change this configuration, please do so now and provide an updated single line diagram by the close of this Thursday, 6/11/2026. If the configuration changes, please also be sure to include any updated dynamic modeling files and attachment line impedance changes.

Additionally, can you please clarify how NOVEC is involved in this request?

Thank you,

Kyle Copeland

From: Grant Wollam <gwollam@founddigitalllc.com>
Sent: Tuesday, June 9, 2026 12:10 PM
To: Copeland, Kyle <Kyle.Copeland@pjm.com>
Cc: Stephenson, Joshua <Joshua.Stephenson@pjm.com>; Affleck, Jonathon <Jonathon.Affleck@pjm.com>; Fernandes, Anisha <Anisha.Fernandes@pjm.com>; Awasthi, Shekhar R <Shekhar.Awasthi@pjm.com>; Del Olmo, Rizki <Rizki.DelOlmo@pjm.com>; will.chung@oklo.com; trevor.curry@oklo.com
Subject: Re: C01-1735 - [REDACTED] Deficiencies

⚠ External Email! Think before clicking links or attachments.

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Kyle,

Thanks for the useful information. The campus has been preliminarily designed as a co-located generation and load (data center) project. The design currently shows 2no. 500kV switchyards. Switchyard 1 is tied to the utility line, the data center campus, and Switchyard 2. Switchyard 2 is tied to Switchyard 1, and the three generation (customer owned) substations. I see your point, that there is confusion on what would be owned by the TO vs. customer, specifically regarding Switchyard 2.

However, it is reasonable to see if we can combine these into one switchyard to reduce overall project cost. We were not sure how PJM/Dominion/NOVEC would require the setup to be for the both the generation side and load side of the campus, so this was our preliminary design. We are open to whichever option is best for the utility. Oklo does not intend to be a NERC Registered TO, so it makes sense to see if we can reduce this to ultimately have just one 500kV switchyard, which is connected to the utility line, data center campus, and generation substations (customer owned), or to have the TO own/operate Switchyard 2. There has also been discussion on load side handoff, and it's likely that Dominion/Novec would require a 230 or 34.5kV handoff instead of 500kV, however we understand that is out of PJM's scope at this time.

We'd be happy to discuss this prior to the kickoff call if the PJM team would like to do so. Let us know if you'd like to set up a meeting or if any immediate updates are needed prior to further discussions.

Best Regards,

image.png

Grant Wollam, PE

Senior Power Systems Engineer

M: (229) 869-7067

E: gwollam@founddigitalllc.com

FoundDigital LLC

Registered Office: 5511 Parkcrest Dr., Suite 103, Austin, TX 78731

From: Copeland, Kyle <Kyle.Copeland@pjm.com>
Date: Tuesday, June 9, 2026 at 10:17 AM
To: Grant Wollam <gwollam@founddigitalllc.com>
Cc: Stephenson, Joshua <Joshua.Stephenson@pjm.com>; Affleck, Jonathon <Jonathon.Affleck@pjm.com>; Fernandes, Anisha <Anisha.Fernandes@pjm.com>; Awasthi,

Shekhar R <Shekhar.Awasthi@pjm.com>; Del Olmo, Rizki <Rizki.DelOlmo@pjm.com>;
will.chung@oklo.com <will.chung@oklo.com>; trevor.curry@oklo.com <trevor.curry@oklo.com>
Subject: RE: C01-1735 - [REDACTED] Deficiencies

Good morning,

PJM has identified an additional deficiency that will need clarification/correction/additional discussion regarding the C01-1735 [REDACTED]. The single line diagram shows a 500 kV intermediate substation between the 500 kV switch and the 500 kV step-up station. This intermediate substation is non-standard for generation interconnection requests. Because of this, additional Transmission Owner coordination will likely be required. At this time, only the work required for the generation interconnection will be scoped as a part of this request, of which, C01-1735 will have full cost responsibility including the construction of two 500 kV substations.

The Project Developer has full responsibility of the design proposed for this project, however to simplify this design, has consideration been given to have the 500 kV line taps feeding directly into the 500 kV intermediate substation which would only require the construction of one substation at this time?

Additionally, this 500 kV intermediate substation has the potential to have network flows through it. Can OKLO please confirm their intention of who will own this switching station? If this is an Oklo owned substation, due to the potential network flows, this substation will require Oklo to become a NERC registered transmission owner where visibility of the circuit breakers is provided to PJM. If Oklo does not intend to own this substation, as mentioned above, Dominion will have to be consulted as to the feasibility of this type of installation. Please clarify Oklo's intention for this substation and becoming a NERC registered transmission owner.

Please let me know if you have any questions.

Thank you,

Kyle Copeland

From: Grant Wollam <gwillam@founddigitalllc.com>
Sent: Monday, May 18, 2026 10:30 AM
To: Stephenson, Joshua <Joshua.Stephenson@pjm.com>
Cc: Will Chung <will.chung@oklo.com>; Trevor Curry <trevor.curry@oklo.com>
Subject: C01-1735 - [REDACTED] Deficiencies

 External Email! Think before clicking links or attachments.

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Hi Joshua,

I am working on resolving the deficiencies for the C01-1735 - [REDACTED] PJM generation application. I had the following questions:

1. What date are the deficiencies required to be resolved by?
2. Can you confirm that the transformers should be Wye-grounded / Wye-grounded per Dominion Energy requirements? I previously had Delta / Wye-grounded.
3. I originally tried to input the Fuel Cell data as a Fuel Cell in NextGen, but the parameters allowed for entry were identical to a synchronous generator, so they did not make sense for a fuel cell (IBR). The closest option was a solar generator, so that is how I entered them. This has still not been fixed in NextGen. The Fuel Cell option needs to be fixed in NextGen to be reflective of an inverter-based resource like a Fuel Cell, or the parameters I enter will not

make any sense (for example, a fuel cell has no value for generator inertia-H). If not, please advise on how I should proceed.

4. Under Additional comments - "Short Circuit Data is Deficient" - can you clarify where this needs to be updated and what it is for? Equipment, PSSE, NextGen application, etc.

Best Regards,

 image.png

Grant Wollam, PE

Senior Power Systems Engineer

M: (229) 869-7067

E: gwillam@founddigitalllc.com

FoundDigital LLC

Registered Office: 5511 Parkcrest Dr., Suite 103, Austin, TX 78731

Attachments:

image001.png 1.3M

image.png 1.3M

SLD 53F103-FDL-XX-XX-SC-E-00002-R2.pdf 418k

Attachment H



Will Chung <will.chung@oklo.com>

NextGen - Data for C01-1735 has been changed by PJM Personnel

1 message

NextGen <nextgen-donotreply@pjm.com>

Thu, Jun 18, 2026 at 12:25 PM

To: mike@oklo.com, will.chung@oklo.com

Cc: joshua.stephenson@pjm.com

A change has been made by PJM on an application for **C01-1735**

Field	Old Value	New Value
GSU8 and GSU9 - MVA Base	200	4
GSU8 and GSU9 - Identical Transformers	60	120

PJM has made this change because: **The single line shows 60 units for Fuel Cells 1 and an additional 60 units for Fuel Cells 2 hence 120 units in total. Each GSU is 4 MVA.**

You are required to provide your approval or denial within five (5) business days by responding directly to your project manager. If no response is received within this timeframe, the change will be considered **approved by default**.

Note: This is an auto-generated email. Do not reply to this email.

Attachment I



Will Chung <will.chung@oklo.com>

Kickoff Call for C01-1735 - PJM / Dominion / Oklo Power LLC

3 messages

Joshua.Stephenson@pjm.com <Joshua.Stephenson@pjm.com>
To: will.chung@oklo.com

Fri, Jun 19, 2026 at 12:39 PM

Hello Will Chung,

PJM is actively reviewing your Cycle 01 interconnection request submission and preparing to schedule project scoping (i.e., kick-off) calls, which we anticipate beginning in the coming weeks.

Given the high volume of projects received, PJM is seeking to streamline the scoping process while maintaining the technical integrity of the studies. In accordance with **PJM Tariff, Part VIII, Subpart B, Section 403(C)**, scoping meetings are optional and may be waived at the discretion of the Applicant and Transmission Owner.

The purpose of the scoping call is to confirm the project details entered in NextGen. These calls will be limited to approximately 15 minutes and will focus only on key information required to initiate the Phase I study. Broader questions regarding the interconnection process or cost estimates will not be addressed during this call.

At this time, we ask that you review your project information in NextGen, with particular attention to:

- Point of Interconnection
- Generator size (Maximum Facility Output and Capacity Interconnection Rights)
- Fuel type and associated technical parameters

PJM will rely on the information as submitted in NextGen to develop the Cycle 01 study model and perform all required analyses.

If you elect to **waive the scoping call** and proceed directly into Phase I using the currently submitted project data, please confirm by replying to your assigned Project Manager no later than **Wednesday, June 24, 2026**. PJM will evaluate the scoping call waiver requests with the Transmission Owners. Scoping calls will only be waived if all three parties agree (Project Developer, Transmission Owner, PJM).

If we do not receive a response by this date, PJM will proceed with scheduling a scoping call with you and the applicable Transmission Owner.

For efficiency, scoping calls will be grouped first by Transmission Owner zone and then by Developer. For example, projects within the same Transmission Owner zone (by the same Project Development company) may be discussed in a single call.

Thank you for your attention to this matter.

Best regards,

Josh Stephenson

Joshua.Stephenson@pjm.com

Will Chung <will.chung@oklo.com>

Mon, Jun 22, 2026 at 1:05 PM

To: Joshua.Stephenson@pjm.com

Bcc: Trevor Curry <trevor.curry@oklo.com>, Mike Donohue <mike@oklo.com>, Grant Wollam <gwollam@founddigitalllc.com>, Kimberly Crandall <kimberly@bastionrozele.com>

Hi Josh,

Oklo does not waive the scoping call and requests that we schedule one. Thank you so much!

[Quoted text hidden]

--



Will Chung

Sr. Director, Grid Integration Strategy | Oklo

(714) 423-1799 | will.chung@oklo.com



Will Chung <will.chung@oklo.com>

Tue, Jul 21, 2026 at 12:24 PM

To: Joshua.Stephenson@pjm.com

Cc: Trevor Curry <trevor.curry@oklo.com>, Kimberly Crandall <kimberly@bastionrozelle.com>, Mike Donohue <mike@oklo.com>, Grant Wollam <gwollam@founddigitalllc.com>

Hi Josh, will there be scoping call before July 27? Please advise. Thank you!

[Quoted text hidden]

Attachment J



Will Chung <will.chung@oklo.com>

NextGen - C01-1735 has been withdrawn

2 messages

NextGen <nextgen-donotreply@pjm.com>

Mon, Aug 3, 2026 at 6:18 AM

To: mike@oklo.com, will.chung@oklo.com

Cc: systemplanning.admin@pjm.com, joshua.stephenson@pjm.com

Dear Applicant,

Thank you for your interest in participating in PJM's Interconnection process.

After careful review of your Application, PJM regrets to inform you that your application, [C01-1735](#), has not demonstrated compliance with the requirements set forth in the PJM Tariff to continue study. As a result, your application has been withdrawn from further study.

Your submission has been withdrawn [C01-1735](#) for the following reason(s):

Deficient

Failed to meet Stability requirements

The dynamic modeling data provided with the initial application and resubmission were both deficient for failure to meet PJM's requirements. The second round issues include: numerous discrepancies between NextGen data fields and the models, the DMDG report and checklist were not provided, and the plant testing showed it was unstable.

Additional Comments:

6/16/2026 (LF-KJC): Load flow data is clear.

[6/18/2026 PJM-RDO]: Short Circuit data is clear.

6/24/2026 (SRA- PJM) : Stability data is deficient with the following outstanding deficiencies:

1. DMDG Report and checklist was not provided with the Round 2 data. Please ensure that the report includes all the required testing per the checklist.
2. In PSSE for the STG GSU1 the H-L and H-T windings are rated at 100 MVA while L-T is rated at 200 MVA. In Nextgen, all windings are rated at 200 MVA even though the impedances match between the two sources. If the windings have different ratings, the impedances need to be converted to the common base before entering into Nextgen.
3. Aux loads for Fuel Cells do not align between Nextgen (1MW,4Mvar) and PSSE (4 MW,1Mvar).
4. Reactive capability for the fuel cell units appears to not line up with Round 1 dynamic model report PQ curve. Each inverter should be capable for 189.8 kVAR which amounts to +/- 113.88 Mvar aggregate. PSSE case has 106.3, -104.4 Mvar as the limits entered. Please check.
5. A 5 cycle 3-phase fault was performed at the POI. The plant was unstable for the 20 second simulation. The developer should check the dynamic model parameters and test the SMIB case to ensure it remains stable for such scenario.

All identified deficiencies contained in your Application have been documented in NextGen and will remain available for your review. PJM has provided this access to assist applicants who may wish to continue developing their projects, address outstanding deficiencies, and reapply in a future submission.

PJM will not be conducting individual discussions regarding its determination for applications that have been withdrawn from study consideration. If you are eligible for a refund, complete the [Wire Verification Form](#) and email to SystemPlanning.Admin@pjm.com.

Your project refund will be processed after PJM receives the completed Wire Verification Form and the applicable billing process has concluded.

Thank you for your interest in PJM.

Regards,
PJM Planning

Note: This is an automated email. Please do not reply to this message.

Will Chung <will.chung@oklo.com>

Wed, Aug 5, 2026 at 1:28 PM

To: Vivek Narayanadas <vivek@oklo.com>, Mike Donohue <mike@oklo.com>, Adrienne Schweer <adrienne@oklo.com>

[Quoted text hidden]

--



Will Chung

Sr. Director, Grid Integration Strategy | Oklo

(714) 423-1799 | will.chung@oklo.com



Attachment K



Vivek Narayanadas <vivek@oklo.com>

[URGENT] Request the immediate reinstatement of the [REDACTED] and [REDACTED] projects to address PJM's critical regional supply and demand

Bielak, Donnie <Donnie.Bielak@pjm.com>

Fri, Aug 7, 2026 at 2:29 PM

To: Mike Donohue <mike@oklo.com>

Cc: "Shoemaker, Jason R." <Jason.Shoemaker@pjm.com>, Will Chung <will.chung@oklo.com>, Trevor Curry <trevor.curry@oklo.com>, Vivek Narayanadas <vivek@oklo.com>, Jacob DeWitte <j@oklo.com>, Adrienne N Schweer <adrienne@oklo.com>, "Krizenoskas, Lisa" <Lisa.Krizenoskas@pjm.com>

Hi Mike,

Upon further review of your C01-1735 and C01-2157 projects, PJM has come to the following conclusions:

For the [REDACTED] (C01-2157) project, we can agree to accept your submission into Cycle 1 with some clarifications regarding the summer PQ curves provided. Specifically please verify, (i) the PQ curves were provided by the manufacturer because we have some concerns about the generator capability increasing at higher temps and (ii) which of the 4 summer temperature PQ curves should be used for the MFO and reactive power assessment.

For the [REDACTED] (C01-1735) project, this withdrawal is still appropriate. You were not able to demonstrate stability for all fuel types through the low voltage ride through (LVRT) test per the DMDG Guideline.

Please refer to Tariff, Part VIII, section 403(B) which governs the deficiency review process. In accordance with that process, an Applicant has 10 Business Days to respond to the deficiencies identified by PJM, and then PJM must use Reasonable Efforts to review Applicant's response within 15 Business Days, and then "either validate or reject the Application." The deficiency review process set forth in the Tariff does not afford an Applicant with another opportunity to cure deficiencies that remain following a Project Developer's deficiency response. Tariff, Part VIII, section 403(B). Accordingly, New Service Request C01-1735 was withdrawn from Cycle 01.

Please reach out to your PJM Project Manager for the clarifications required for C01-2157 in order to reinstate this project into Cycle 1.

Thank you.

Donnie Bielak

610-666-4734

donnie.bielak@pjm.com

From: Mike Donohue <mike@oklo.com>
Sent: Tuesday, August 4, 2026 6:17 PM
To: Bielak, Donnie <Donnie.Bielak@pjm.com>
Cc: Shoemaker, Jason R. <Jason.Shoemaker@pjm.com>; Will Chung <will.chung@oklo.com>; Trevor Curry <trevor.curry@oklo.com>; Vivek Narayanadas <vivek@oklo.com>; Jacob DeWitte <j@oklo.com>; Adrienne N Schweer <adrienne@oklo.com>
Subject: Re: [URGENT] Request the immediate reinstatement of the [REDACTED] projects to address PJM's critical regional supply and demand

⚠ External Email! Think before clicking links or attachments.

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Donnie,

Thank you and appreciate your review on these projects. Below provides a bit more insight for each project and the areas that appear to have been mis-read by the project manager.

Summary

On August 3, 2026, PJM moved the [REDACTED] applications directly from "submitted" to "withdrawn" status. O [REDACTED] at either project was at risk of withdrawal. From Oklo's perspective, both projects had cured every deficiency PJM had communicated, and in each case the last exchange with PJM was a confirmation of receipt or an unanswered submission from Oklo. In NextGen's system, all deficiency flags, even when cured, remain, but they are coded green, so there is not a clear designation of what remains without a response from PJM staff via email.

- [REDACTED]
1. On first submission, Oklo identified and disclosed to PJM that the NextGen portal cannot properly accommodate fuel cells as a generation type. The Fuel Cell entry tab is identical to the synchronous generator entry tab, but fuel cells are an inverter-based resource and share none of the relevant technical characteristics of a synchronous generator. Oklo's engineering team concluded that entering the units under the solar generator tab would give PJM more accurate parameters, since the correct fields were available there. At the first review period PJM acknowledged the portal issue and instructed Oklo to enter the fuel cells using synchronous generator parameters instead.
 2. PJM's initial deficiency comments, provided by email on May 15, noted that the fuel cells entered momentary cessation during a fault test. Oklo updated the PSSE .dyr file and cured that deficiency. PJM noted that the model was unstable under a fault test. When Oklo reviewed that comment on August 3, it traced the issue to the gas turbine generator power system stabilizer and corrected it. Under PJM's dynamic modeling guidelines, only inverter-based resources (here, the fuel cells) are required to undergo fault testing. PJM tested only the fuel cells in the first review, then fault-tested the entire facility, including equipment not subject to that requirement, in the second.
 3. The deficiencies flagged in this review process are related to stability studies, which are conducted in the second study phase. It is unclear why this was flagged.
- [REDACTED]

1. PJM's stated reason was: "There are discrepancies between the modeling files, NextGen, and PQ curves that were not resolved even after following up over email. The provided PQ curves (rated load point 109.75 MVA) appear to be for a different machine than the one used in the project. We do not have data to reliably model this project based on what was provided."
2. PQ curve was accepted on every other Oklo project. In late May and early June, each of Oklo's Cycle 01 projects received a similar deficiency concerning the temperature at which the PQ curve was provided. Oklo responded across all projects with an updated PQ curve at the correct temperature. That curve is for the identical Siemens machine (SGen6-100A-2P) used at [REDACTED]. The rated load point differs because the same machine is rated at different MVA depending on specific design, and the curve lists PQ derating in per unit precisely so that the setpoints at any applicable MVA value can be derived directly from it.

Mike

Michael Donohue

VP Power Origination & Energy Strategy | Oklo

201-835-8463 | Mike@oklo.com

[Quoted text hidden]

Attachment L

[Redacted In Its Entirety]

Attachment M

[Redacted In Its Entirety]

Attachment N

[Redacted In Its Entirety]

Attachment O

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Oklo Inc.	)	
	)	Docket No. EL26-____-000
Complainant,	)	
	)	
v.	)	
	)	
PJM Interconnection, L.L.C.	)	
Respondent.	)	

PROTECTIVE ORDER

(Issued _____)

1. Participants in this proceeding(s) may exchange documents or materials that are deemed to contain Privileged Material and/or Critical Energy/Electric Infrastructure Information (CEII), as those terms are defined herein. Accordingly, IT IS ORDERED THAT this Protective Order shall govern the use of all such material produced by, or on behalf of, any Participant in the above-captioned proceeding(s).

The Commission's regulations¹ and its policy governing the labelling of controlled unclassified information (CUI),² establish and distinguish the respective designations of Privileged Material and CEII. As to these designations, this Protective Order provides that a Participant:

- A. *may* designate as Privileged Material any material which customarily is treated by that Participant as commercially sensitive or proprietary or material subject to a legal privilege, which is not otherwise available to the public, and which, if disclosed, would subject that Participant or its customers to risk of competitive disadvantage or other business injury; and

¹ Compare 18 C.F.R. § 388.112, with 18 C.F.R. § 388.113. This Protective Order does not alter the respective requirements imposed by these sections on Privileged Material or CEII.

² Notice of Document Labelling Guidance for Documents Submitted to or Filed with the Commission or Commission Staff, 82 Fed. Reg. 18,632 (Apr. 20, 2017) (issued by Commission Apr. 14, 2017).

- B. *must* designate as CEII, any material that meets the definition of that term as provided by 18 C.F.R. §§ 388.113(a), (c).
2. For the purposes of this Protective Order, the listed terms are defined as follows:
- A. Participant(s): As defined at 18 C.F.R. § 385.102(b).
 - B. Privileged Material:³
 - i. Material (including depositions) provided by a Participant in response to discovery requests or filed with the Commission, and that is designated as Privileged Material by such Participant;⁴
 - ii. Material that is privileged under federal, state, or foreign law, such as work-product privilege, attorney-client privilege, or governmental privilege, and that is designated as Privileged Material by such Participant;⁵
 - iii. Any information contained in or obtained from such designated material;
 - iv. Any other material which is made subject to this Protective Order by the Presiding Administrative Law Judge (Presiding Judge) or the Chief Administrative Law Judge (Chief Judge) in the absence of the Presiding Judge or where no presiding judge is designated, the Federal Energy Regulatory Commission (Commission), any court, or other body having appropriate authority, or by agreement of the Participants (subject to approval by the relevant authority);

³ The Commission's regulations state that "[f]or the purposes of the Commission's filing requirements, non-CEII subject to an outstanding claim of exemption from disclosure under FOIA will be referred to as privileged material." 18 C.F.R. § 388.112(a). The regulations further state that "[f]or material filed in proceedings set for trial-type hearing or settlement judge proceedings, a participant's access to material for which privileged treatment is claimed is governed by the presiding official's protective order." 18 C.F.R. § 388.112(b)(2)(v).

⁴ See *infra* P 11 for the procedures governing the labeling of this designation.

⁵ The Commission's regulations state that "[a] presiding officer may, by order . . . restrict public disclosure of discoverable matter in order to . . . [p]reserve a privilege of a participant. . . ." 18 C.F.R. § 385.410(c)(3). To adjudicate such privileges, the regulations further state that "[i]n the absence of controlling Commission precedent, privileges will be determined in accordance with decisions of the Federal courts with due consideration to the Commission's need to obtain information necessary to discharge its regulatory responsibilities." 18 C.F.R. § 385.410(d)(1)(i).

- v. Notes of Privileged Material (memoranda, handwritten notes, or any other form of information (including electronic form) which copies or discloses Privileged Material);⁶ or
- vi. Copies of Privileged Material.
- vii. Privileged Material does not include:
 - a. Any information or document that has been filed with and accepted into the public files of the Commission, or contained in the public files of any other federal or state agency, or any federal or state court, unless the information or document has been determined to be privileged by such agency or court;
 - b. Information that is public knowledge, or which becomes public knowledge, other than through disclosure in violation of this Protective Order; or
- viii. Additional Subcategories of Privileged Material in Oil Pipeline Proceedings:
 - a. Section 15(13) Privileged Material:⁷ Any materials, permitted to be produced by this Protective Order, concerning the nature, kind, quantity, destination or routing of any products tendered or delivered to a Participant for interstate transportation by or on behalf of a specific shipper, when the identity of the shipper is contained in or may be discerned from the material to be provided. This subcategory shall not apply if the shipper to whom such information pertains consents that the information be categorized as Privileged Material under the other provisions of this Protective Order or produced outside the scope of this Protective Order.
 - b. Highly Confidential Privileged Material: A Participant may use this designation for those materials that are of such a commercially sensitive nature among the Participants or of such a private, personal nature that the producing Participant is able to

⁶ Notes of Privileged Material are subject to the same restrictions for Privileged Material except as specifically provided in this Protective Order.

⁷ Section 15(13) of the Interstate Commerce Act, 49 U.S.C. § 15(13), prohibits disclosure of information pertaining to the business activities of oil pipeline shippers or consignees. Participants disclosing such information in accordance with the terms of this Protective Order will be deemed to not have contravened the prohibitions of this statutory provision.

justify a heightened level of confidential protection with respect to those materials.

- C. Critical Energy/Electric Infrastructure Information (CEII): As defined at 18 C.F.R. §§ 388.113(a), (c).
 - D. Non-Disclosure Certificate: The certificate attached to this Protective Order, by which Participants granted access to Privileged Material and/or CEII must certify their understanding that such access to such material is provided pursuant to the terms and restrictions of this Protective Order, and that such Participants have read the Protective Order and agree to be bound by it. All executed Non-Disclosure Certificates must be served on all Participants on the official service list maintained by the Secretary of the Commission for this proceeding.
 - E. Reviewing Representative:⁸ A person who has signed a Non-Disclosure Certificate and who is:
 - i. Commission Trial Staff designated as such in this proceeding;
 - ii. An attorney who has made an appearance in this proceeding for a Participant;
 - iii. Attorneys, paralegals, and other employees associated for purposes of this case with an attorney who has made an appearance in this proceeding on behalf of a Participant;
 - iv. An expert or an employee of an expert retained by a Participant for the purpose of advising, preparing for, submitting evidence or testifying in this proceeding;
 - v. A person designated as a Reviewing Representative by order of the Presiding Judge, the Chief Judge, or the Commission; or
 - vi. Employees or other representatives of Participants appearing in this proceeding with significant responsibility for this docket.⁹
3. Privileged Material and/or CEII shall be made available under the terms of this Protective Order only to Participants and only to their Reviewing Representatives as provided in Paragraphs 6-10 of this Protective Order. The contents of Privileged Material, CEII or any other form of

⁸ For oil pipeline proceedings involving the additional subcategories of Privileged Material, there shall also be Section 15(13) Reviewing Representatives and Highly Confidential Reviewing Representatives subject to the corresponding terms of this definition.

⁹ In oil pipeline proceedings, individuals that have direct or supervisory responsibilities over the purchase, sale, marketing, or exchange of crude oil or petroleum products (including liquefied petroleum gases), are ineligible to qualify as a Reviewing Representative.

information that copies or discloses such materials shall not be disclosed to anyone other than in accordance with this Protective Order and shall be used only in connection with this specific proceeding.

4. All Privileged Material and/or CEII must be maintained in a secure place. Access to those materials must be limited to Reviewing Representatives specifically authorized pursuant to Paragraphs 7-9 of this Protective Order.

5. Privileged Material and/or CEII must be handled by each Participant and by each Reviewing Representative in accordance with the Non-Disclosure Certificate executed pursuant to Paragraph 9 of this Protective Order. Privileged Material and/or CEII shall not be used except as necessary for the conduct of this proceeding, nor shall they (or the substance of their contents) be disclosed in any manner to any person except a Reviewing Representative who is engaged in this proceeding and who needs to know the information in order to carry out that person's responsibilities in this proceeding. Reviewing Representatives may make copies of Privileged Material and/or CEII, but such copies automatically become Privileged Material and/or CEII. Reviewing Representatives may make notes of Privileged Material, which shall be treated as Notes of Privileged Material if they reflect the contents of Privileged Material.

6. If a Reviewing Representative's scope of employment includes any of the activities listed under this Paragraph 7, such Reviewing Representative may not use information contained in any Privileged Material and/or CEII obtained in this proceeding for a commercial purpose (e.g. to give a Participant or competitor of any Participant a commercial advantage):

- A. Energy marketing;
- B. Direct supervision of any employee or employees whose duties include energy marketing; or
- C. The provision of consulting services to any person whose duties include energy marketing.

7. If a Participant wishes to designate a person not described in Paragraph 3.E above as a Reviewing Representative, the Participant must seek agreement from the Participant providing the Privileged Material and/or CEII. If an agreement is reached, the designee shall be a Reviewing Representative pursuant to Paragraph 3.D of this Protective Order with respect to those materials. If no agreement is reached, the matter must be submitted to the Presiding Judge for resolution.

8. A Reviewing Representative shall not be permitted to inspect, participate in discussions regarding, or otherwise be permitted access to Privileged Material and/or CEII pursuant to this Protective Order until three business days after that Reviewing Representative first has executed

and served a Non-Disclosure Certificate.¹⁰ However, if an attorney qualified as a Reviewing Representative has executed a Non-Disclosure Certificate, any participating paralegal, secretarial and clerical personnel under the attorney's instruction, supervision or control need not do so. Attorneys designated Reviewing Representatives are responsible for ensuring that persons under their supervision or control comply with this Protective Order, and must take all reasonable precautions to ensure that Privileged Material and/or CEII are not disclosed to unauthorized persons. All executed Non-Disclosure Certificates must be served on all Participants on the official service list maintained by the Secretary of the Commission for the proceeding.

9. Any Reviewing Representative may disclose Privileged Material and/or CEII to any other Reviewing Representative as long as both Reviewing Representatives have executed a Non-Disclosure Certificate. In the event any Reviewing Representative to whom Privileged Material and/or CEII are disclosed ceases to participate in this proceeding, or becomes employed or retained for a position that renders him or her ineligible to be a Reviewing Representative under Paragraph 3.D of this Protective Order, access to such materials by that person shall be terminated. Even if no longer engaged in this proceeding, every person who has executed a Non-Disclosure Certificate shall continue to be bound by the provisions of this Protective Order and the Non-Disclosure Certificate for as long as the Protective Order is in effect.¹¹

10. All Privileged Material and/or CEII in this proceeding filed with the Commission, submitted to the Presiding Judge, or submitted to any Commission personnel, must comply with the Commission's *Notice of Document Labelling Guidance for Documents Submitted to or Filed with the Commission or Commission Staff*.¹² Consistent with those requirements:

- A. Documents that contain Privileged Material must include a top center header on each page of the document with the following text: CUI//PRIV.¹³ Any corresponding electronic files must also include this text in the file name.
- B. Documents that contain CEII must include a top center header on each page of the document with the following text: CUI//CEII. Any corresponding electronic files must also include this text in the file name.

¹⁰ During this three-day period, a Participant may file an objection with the Presiding Judge or the Commission contesting that an individual qualifies as a Reviewing Representative, and the individual shall not receive access to the Privileged Material and/or CEII until resolution of the dispute.

¹¹ See *infra* P 19.

¹² 82 Fed. Reg. 18,632 (Apr. 20, 2017) (issued by Commission Apr. 14, 2017).

¹³ The parties in oil pipeline proceedings may desire additional protection in their handling of the following types of material as defined in this Protective Order: Section 15(13) Privileged Material; and Highly Confidential Privileged Material. Participants may incorporate these descriptive subcategories into their document labels as needed (e.g., CUI//PRIV-Section 15(13) or CUI//PRIV-HC).

- C. Documents that contain both Privileged Material and CEII must include a top center header on each page of the document with the following text: CUI//CEII/PRIV. Any corresponding electronic files must also include this text in the file name.
 - D. The specific content on each page of the document that constitutes Privileged Material and/or CEII must also be clearly identified. For example, lines or individual words or numbers that include both Privileged Material and CEII shall be prefaced and end with “BEGIN CUI//CEII/PRIV” and “END CUI//CEII/PRIV”.
11. If any Participant desires to include, utilize, or refer to Privileged Material or information derived from Privileged Material in testimony or other exhibits during the hearing in this proceeding in a manner that might require disclosure of such materials to persons other than Reviewing Representatives, that Participant first must notify both counsel for the disclosing Participant and the Presiding Judge, and identify all such Privileged Material. Thereafter, use of such Privileged Material will be governed by procedures determined by the Presiding Judge.
12. Nothing in this Protective Order shall be construed as precluding any Participant from objecting to the production or use of Privileged Material and/or CEII on any appropriate ground.
13. Nothing in this Protective Order shall preclude any Participant from requesting the Presiding Judge (or the Chief Judge in the Presiding Judge’s absence or where no presiding judge is designated), the Commission, or any other body having appropriate authority, to find this Protective Order should not apply to all or any materials previously designated Privileged Material pursuant to this Protective Order. The Presiding Judge (or the Chief Judge in the Presiding Judge’s absence or where no presiding judge is designated), the Commission, or any other body having appropriate authority may alter or amend this Protective Order as circumstances warrant at any time during the course of this proceeding.
14. Each Participant governed by this Protective Order has the right to seek changes in it as appropriate from the Presiding Judge (or the Chief Judge in the Presiding Judge’s absence or where no presiding judge is designated), the Commission, or any other body having appropriate authority.
15. Subject to Paragraph 18, the Presiding Judge (or the Chief Judge in the Presiding Judge’s absence or where no presiding judge is designated), or the Commission shall resolve any disputes arising under this Protective Order pertaining to Privileged Material according to the following procedures. Prior to presenting any such dispute to the Presiding Judge, the Chief Judge or the Commission, the Participants to the dispute shall employ good faith best efforts to resolve it.
- A. Any Participant that contests the designation of material as Privileged Material shall notify the Participant that provided the Privileged Material by specifying in writing
 - B. the material for which the designation is contested.

- C. In any challenge to the designation of material as Privileged Material, the burden of proof shall be on the Participant seeking protection. If the Presiding Judge, the Chief Judge, or the Commission finds that the material at issue is not entitled to the designation, the procedures of Paragraph 18 shall apply.
- D. The procedures described above shall not apply to material designated by a Participant as CEII. Material so designated shall remain subject to the provisions of this Protective Order, unless a Participant requests and obtains a determination from the Commission's CEII Coordinator that such material need not retain that designation.

16. The designator will have five (5) days in which to respond to any pleading requesting disclosure of Privileged Material. Should the Presiding Judge, the Chief Judge, or the Commission, as appropriate, determine that the information should be made public, the Presiding Judge, the Chief Judge, or the Commission will provide notice to the designator no less than five (5) days prior to the date on which the material will become public. This Protective Order shall automatically cease to apply to such material on the sixth (6th) calendar day after the notification is made unless the designator files a motion with the Presiding Judge, the Chief Judge, or the Commission, as appropriate, with supporting affidavits, demonstrating why the material should continue to be privileged. Should such a motion be filed, the material will remain confidential until such time as the interlocutory appeal or certified question has been addressed by the Motions Commissioner or Commission, as provided in the Commission's regulations, 18 C.F.R. §§ 385.714, .715. No Participant waives its rights to seek additional administrative or judicial remedies after a Presiding Judge or Chief Judge decision regarding Privileged Material or the Commission's denial of any appeal thereof or determination in response to any certified question. The provisions of 18 C.F.R. §§ 388.112 and 388.113 shall apply to any requests under the Freedom of Information Act (5 U.S.C. § 552) for Privileged Material and/or CEII in the files of the Commission.

17. Privileged Material and/or CEII shall remain available to Participants until the later of 1) the date an order terminating this proceeding no longer is subject to judicial review, or 2) the date any other Commission proceeding relating to the Privileged Material and/or CEII is concluded and no longer subject to judicial review. After this time, the Participant that produced the Privileged Material and/or CEII may request (in writing) that all other Participants return or destroy the Privileged Material and/or CEII. This request must be satisfied with within fifteen (15) days of the date the request is made. However, copies of filings, official transcripts and exhibits in this proceeding containing Privileged Material, or Notes of Privileged Material, may be retained if they are maintained in accordance with Paragraph 5 of this Protective Order. If requested, each Participant also must submit to the Participant making the request an affidavit stating that to the best of its knowledge it has satisfied the request to return or destroy the Privileged Material and/or CEII. To the extent Privileged Material and/or CEII are not returned or destroyed, they shall remain subject to this Protective Order.

18. Regardless of any order terminating this proceeding, this Protective Order shall remain in effect until specifically modified or terminated by the Presiding Judge, the Chief Judge, or the Commission. All CEII designations shall be subject to the "[d]uration of the CEII designation" provisions of 18 C.F.R. § 388.113(e).

19. Any violation of this Protective Order and of any Non-Disclosure Certificate executed hereunder shall constitute a violation of an order of the Commission.

Presiding Administrative Law Judge

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

Oklo Inc.	)	
	)	Docket No. EL26-__-000
Complainant,	)	
	)	
v.	)	
	)	
PJM Interconnection, L.L.C.	)	
Respondent.	)	

NON-DISCLOSURE CERTIFICATE

I hereby certify my understanding that access to Privileged Material⁷⁰ and/or Critical Energy/Electric Infrastructure Information (CEII) is provided to me pursuant to the terms and restrictions of the Protective Order in this proceeding, that I have been given a copy of and have read the Protective Order, and that I agree to be bound by it. I understand that the contents of Privileged Material and/or CEII, any notes or other memoranda, or any other form of information that copies or discloses such materials, shall not be disclosed to anyone other than in accordance with the Protective Order. I acknowledge that a violation of this certificate constitutes a violation of an order of the Federal Energy Regulatory Commission.

By: _____

Printed Name: _____

Title: _____

Representing: _____

Date: _____

⁷⁰ If applicable, for pipeline proceedings involving additional subcategories of Privileged Material, the signatory should indicate here whether this Non-Disclosure Certificate additionally governs access to:

☐ : Section 15(13) Privileged Material

☐ : Highly Confidential Privileged Material

Attachment P

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

Oklo Inc.	)	
	)	Docket No. EL26-____-000
Complainant,	)	
	)	
v.	)	
	)	
PJM Interconnection, L.L.C.	)	
Respondent.	)	

NOTICE OF COMPLAINT

Take notice that on August 27, 2026, Oklo Inc. filed a formal complaint against PJM Interconnection, LLC (“PJM”), pursuant to Section 206 of the Federal Power Act and Rule 206 of the Commission’s Rules of Practice and Procedure, alleging that PJM has unlawfully administered its interconnection process with respect to C01-1735 and unjustifiably withdrawn the project from Cycle 01. Oklo asserts that PJM’s implementation of its interconnection procedures is unjust and unreasonable.

Oklo certifies that copies of the complaint were served on the contacts for PJM as listed on the Commission’s list of Corporate Officials.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission’s Rules of Practice and Procedure (18 CFR 385.211 and 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. The Respondent’s answer and all interventions, or protests must be filed on or before the comment date. The Respondent’s answer, motions to intervene, and protests must be served on Oklo.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the “eFiling” link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 5 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426.

This filing is accessible on-line at <http://www.ferc.gov>, using the “eLibrary” link and is available for review in the Commission’s Public Reference Room in Washington, DC. There is an “eSubscription” link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.



Will Chung <will.chung@oklo.com>

NextGen - Project data for [REDACTED] has been received (C01-1735) - Additional steps may be required to complete application

1 message

NextGen <nextgen-donotreply@pjm.com>
To: mike@oklo.com, will.chung@oklo.com
Cc: ipadmin@pjm.com

Mon, Apr 27, 2026 at 12:12 PM

Thank you for submitting your project data, signed agreement, and deposit information. PJM will review the application for completeness and will respond if we have any questions.

If letters of credit were submitted, please send the original signed letters of credit to:

PJM Interconnection, LLC
2750 Monroe Boulevard
Audubon, PA 19403
Attn: Interconnection Projects

The application is not considered complete until the signed agreement, deposits, and site control are received and deemed acceptable by PJM. Complete applications will be reviewed at the close of the cycle application phase.

Track your submission's progress on the [Projects](#) tab: Project ID: C01-1735.

Information about the interconnection process that may affect your project is regularly discussed at the [Interconnection Process Subcommittee \(IPS\)](#).

Project Developers can also find training videos on the interconnection process on the [PJM Training Resources](#) page under the "Planning" section.

If you have questions or concerns, please contact our Interconnection Projects Department at IPAdmin@pjm.com

Note: This is an auto-generated email. Do not reply to this email.



Will Chung <will.chung@oklo.com>

NextGen - New Service Request for [REDACTED] has been submitted (C01-1735) - No further action required

1 message

NextGen <nextgen-donotreply@pjm.com>

Sat, May 2, 2026 at 1:47 PM

To: mike@oklo.com, will.chung@oklo.com

Cc: ipadmin@pjm.com, joshua.stephenson@pjm.com

PJM has reviewed your application for Project ID [C01-1735](#) and no further action is needed at this time. After the close of the Application Deadline, PJM will begin the application review phase to determine the validity of such submitted applications, beginning with a deficiency review.

Additional Comments: None

Track your submission's progress on the [Projects](#) tab: Project ID: C01-1735

Information about the interconnection process that may affect your project is regularly discussed at the [Interconnection Process Subcommittee \(IPS\)](#).

Training videos on the interconnection process are available on the [PJM Training Resources](#) page under the "Planning" section.

If you have questions or concerns, please contact our Interconnection Projects Department at IPAdmin@pjm.com.

Note: This is an auto-generated email. Do not reply to this mail.

Kelsey Laabs <kelsey@oklo.com>

Fwd: NextGen - PJM requests additional information for [REDACTED] - C01-1735

Will Chung <will.chung@oklo.com>
To: Kelsey Laabs <kelsey@oklo.com>

Thu, Aug 27, 2026 at 3:27 PM

----- Forwarded message -----

From: **NextGen** <nextgen-donotreply@pjm.com>
Date: Fri, May 15, 2026 at 1:43 PM
Subject: NextGen - PJM requests additional information for [REDACTED] - C01-1735
To: <mike@oklo.com>, <will.chung@oklo.com>
Cc: <ipadmin@pjm.com>, <joshua.stephenson@pjm.com>

PJM requests additional information about the data provided for C01-1735 - [REDACTED]

Please log into NextGen to address all comments or provide additional information within 10 business days (by close of business on 06/01/2026).

Any request for which a Project Developer or Eligible Customer has not provided satisfactory responses within 10 business days shall be deemed to be terminated and withdrawn. When you access your application, the section(s) containing comments will be marked in the left navigation.

To proceed, please address all comments within the application, including the additional comments listed below, before resubmitting. Please contact your PJM Project Manager ([Josh Stephenson](#)) with any project-specific questions.

The deficiency comments provided below are not intended to be exhaustive and reflect only the most recent comment for each field. Applicants are responsible for reviewing each deficient field in NextGen and addressing all associated comments to ensure a complete and satisfactory cure.

Transformer Information

Low-side: [MEPPI-Jones] Short Circuit: NextGen Fuel Cell terminal voltage (480V) does not match associated step-up transformer low-side nominal voltage (13.8 kV) Please review and update.

High-side: MPT winding configurations don't meet power transformer requirement for Dominion. Please verify and update.

Low-side: [MEPPI-Jones] Short Circuit: NextGen Fuel Cell terminal voltage (480V) does not match associated step-up transformer low-side nominal voltage (13.8 kV) Please review and update.

Generator Information

Machine ID: You have selected a generator type of Solar, but indicated it is a fuel cell. You will need to remove this generator and add a new one with the correct type of Fuel Cell.

Machine ID: You have selected a generator type of Solar, but indicated it is a fuel cell. You will need to remove this generator and add a new one with the correct type of Fuel Cell.

MVA base: [MEPPI-Jones] Short Circuit: Please update value to per inverter.

MVA base: [MEPPI-Jones] Short Circuit: Please update value to per inverter.

Project Capability

Capacity contract type: Is there a contract in place for supplying this project with natural gas? If not, will there be? If yes, when will that contract be in place?

Dynamic File(s): [MEPPI-Jones] Stability:

- 1) Please add Winding Nominal kV to the Nuclear STG GSU's in PSSE.
- 2) Fuel Cell's PSSE model REGCB CON (J+6) and REECD CON (J+27), I_{max} setting is higher than typical. Please review and update as needed.
- 3) Fuel Cell's PSSE model REECD CON (J+1) VUP as provided is atypical. Please check and correct if needed
- 4) Fuel Cell's PSSE model REECD CON (J+5) KQV which is provided as 0. This is usually a positive number. Correct if needed.
- 5) Fuel Cell's appeared to enter Momentary Cessation during the voltage ride thru test. Check REECD CON (J+74) and CON (J+75) settings. Please review and update.
- 6) For all generators using PSSE model GENTPJ1 typically X^q = X^d but these do not match in the dynamic case.

Single line diagram: [MEPPI-Jones] Short Circuit:

- 1) Please include generators MVABase and transformer winding configuration in the single line diagram.
- 2) Please provide a detailed engineering single line diagram to show, including but not limited to, the layout of inverters, step up transformers, and other associated parameters for the Fuel Cell phase 1.

Generating Facility Information

Longitude: These coordinates should correspond to the location of the collector substation. Please confirm or update.

Latitude: These coordinates should correspond to the location of the collector substation. Please confirm or update.

Point of Interconnection

Latitude: Please update these coordinates to the tap location along the transmission line.

Substation A PSS/e Bus #: Possum Point 500 kV is 314922. Please populate.

Substation B PSS/e Bus #: Ladysmith 500 kV is 314911. Please populate.

Total length of line: PJM shows the length of this line is 47.56 miles. Please update this value and the mileages from substation A and B accordingly.

Distance from POI to substation A: PJM shows the length of Possum Point - Ladysmith 500 kV line is 47.56 miles. Please update the distance from substation A accordingly.

Distance from POI to substation B: PJM shows the length of Possum Point - Ladysmith 500 kV line is 47.56 miles. Please update the distance from substation B accordingly.

Longitude: Please update these coordinates to the tap location along the transmission line.

Site Control & Supporting Docs

Site Plan: Please add pins/geometry to identify the location of the Point of Interconnection and collector substation.

Additional Comments:

[05/15/2026 PJM-RDO]: Short Circuit data is deficient. Please verify and update.

[MEPPI-Jones] Stability:

1) The single line diagram shows two 500 kV transmission lines leaving the generating facility. Is the second line future?

2) Per PJM's DMDG the PSSE cases should initialize without any DSTATE errors or suspect initial conditions. When initializing the full project facility with all generators turned on as provided in [REDACTED] sav there are a lot of suspect initial conditions. Initializing synchronous machines alone resulted in only excitation limiter models listed as suspect. Initializing inverter-based resources only resulted in all renewable models listed as suspect. Please review and update.

5/15/2026 (LF-KJC): Load flow data deficient. The POI mileage needs to be clarified and the fuel cells need to be submitted as fuel cells instead of solar.

Legal Comments: None

Thank you,

PJM Planning

Note: This is an auto-generated email. Do not reply to this email.

--

Will Chung

Sr. Director, Grid Integration Strategy | Oklo

(714) 423-1799 | will.chung@oklo.com



Will Chung <will.chung@oklo.com>

C01-1735 - [REDACTED] Deficiencies**Stephenson, Joshua** <Joshua.Stephenson@pjm.com>

Tue, May 26, 2026 at 8:58 AM

To: Grant Wollam <gwollam@founddigitalllc.com>

Cc: Will Chung <will.chung@oklo.com>, Trevor Curry <trevor.curry@oklo.com>

Grant,

We discussed your concerns regarding the Fuel Cell data fields and agree changes are need to the form, but they will not be available in the near term. The generator type will need to be changed to "Fuel Cell" as the election impacts other systems. To address the deficiencies, please fill out any fields that pertain to the project and enter "0" for the rest. You can manually add all of the inverter details from the first image to the 'Additional comments related to above configuration' field highlighted in the second image.

Machine ID *	Generator subcategory *
Fuel Cell 1	Fixed
Manufacturer *	Model number
Bloom Energy	INV-750
Model name *	Version number
AC7	
MW value per inverter (Nominal rating) *	Number of identical inverter(s) *
0.300 MW	560
MVA base *	Terminal Voltage *
198.800000 MVA	0.480000 kV
Maximum fault current output from the inverter * ⓘ	Requested CIRs *
1.500000 p.u.	150.00 MW

Additional comments related to above configuration

Thanks,

Josh

From: Stephenson, Joshua**Sent:** Tuesday, May 19, 2026 4:31 PM**To:** 'Grant Wollam' <gwollam@founddigitalllc.com>**Cc:** Will Chung <will.chung@oklo.com>; Trevor Curry <trevor.curry@oklo.com>**Subject:** RE: C01-1735 - [REDACTED] Deficiencies

Hi Grant,

We are looking into number 3. The due date for the comments is specified in Nextgen on the project tab and in the email that was sent – close of business June 1, 2026. The additional comments stating the Short Circuit review is deficient in for awareness. By resolving the red deficiency flags in the application you will be addressing the short circuit feedback.

Here is Dominion's standards:

This is Dominion's requirement for MPT <https://www.pjm.com/-/media/DotCom/planning/plan-standards/private-dominion/facility-connection-requirements1.ashx?la=en>

3.2 Interconnection Generator Step-up Transformer Requirements

The Customer-interconnected generation step-up transformer (GSU) is required to provide a source of zero sequence current to the transmission system, aiding in ground fault detection. The utility side of the GSU will be effectively grounded to prevent an excessive increase in voltage during single-phase to-ground faults. A GSU that can pass but is not a source of zero sequence current is only appropriate if a ground source is present on the medium voltage terminal and will require evaluation prior to permission being granted. The interconnected GSU will be protected using dual high-speed current differentials.

The following transformer configurations are commonly used to meet the above requirements:

- Utility-side-grounded wye, generator-side-**delta** (typical for synchronous generation).
- Utility-side-grounded wye, generator-side-grounded wye, delta on the tertiary (typical for inverted-based generation).

Thanks,

Josh

From: Grant Wollam <gwollam@founddigitalllc.com>

Sent: Monday, May 18, 2026 10:30 AM

To: Stephenson, Joshua <Joshua.Stephenson@pjm.com>

Cc: Will Chung <will.chung@oklo.com>; Trevor Curry <trevor.curry@oklo.com>

Subject: C01-1735 - [REDACTED] Deficiencies

External Email! Think before clicking links or attachments.

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Hi Joshua,

I am working on resolving the deficiencies for the C01-1735 - [REDACTED] PJM generation application. I had the following questions:

1. What date are the deficiencies required to be resolved by?
2. Can you confirm that the transformers should be Wye-grounded / Wye-grounded per Dominion Energy requirements? I previously had Delta / Wye-grounded.
3. I originally tried to input the Fuel Cell data as a Fuel Cell in NextGen, but the parameters allowed for entry were identical to a synchronous generator, so they did not make sense for a fuel cell (IBR). The closest option was a solar generator, so that is how I entered them. This has still not been fixed in NextGen. The Fuel Cell option needs to be fixed in NextGen to be reflective of an inverter-based resource like a Fuel Cell, or the parameters I enter will not make any sense (for example, a fuel cell has no value for generator inertia-H). If not, please advise on how I should proceed.
4. Under Additional comments - "Short Circuit Data is Deficient" - can you clarify where this needs to be updated and what it is for? Equipment, PSSE, NextGen application, etc.

Best Regards,



Grant Wollam, PE

Senior Power Systems Engineer

M: (229) 869-7067

E: gwollam@founddigitalllc.com

FoundDigital LLC

Registered Office: 5511 Parkcrest Dr., Suite 103, Austin, TX 78731

Re: C01-1735 - [REDACTED] Deficiencies**gwillam@founddigitalllc.com Grant Wollam**

Wednesday, June 10, 2026 at 12:35:39 PM Pacific Daylight Time

To: Kyle.Copeland@pjm.com Copeland, Kyle

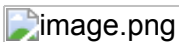
Cc: Joshua.Stephenson@pjm.com Stephenson, Joshua, Jonathon.Affleck@pjm.com Affleck, Jonathon, Anisha.Fernandes@pjm.com Fernandes, Anisha, Shekhar.Awasthi@pjm.com Awasthi, Shekhar R, Rizki.DelOlmo@pjm.com Del Olmo, Rizki, will.chung@oklo.com will.chung@oklo.com, trevor.curry@oklo.com trevor.curry@oklo.com, rbath@founddigitalds.com Robert Bath

Hi Kyle,

We have decided to update the project's configuration to include just the one utility owned switchyard which would connect to the customer owned substations. This updated SLD is attached for PJM's review. Please let us know if you have any further questions on this.

This does not impact the dynamic modeling files or attachment line impedance, so this is the only change. At this point, I do not see an option to update this in NextGen directly. Let me know if action is required there.

Best Regards,

**Grant Wollam, PE**

Senior Power Systems Engineer

M: (229) 869-7067**E:** gwillam@founddigitalllc.com**FoundDigital LLC**

Registered Office: 5511 Parkcrest Dr., Suite 103, Austin, TX 78731

From: Copeland, Kyle <Kyle.Copeland@pjm.com>**Date:** Tuesday, June 9, 2026 at 2:01 PM**To:** Grant Wollam <gwillam@founddigitalllc.com>**Cc:** Stephenson, Joshua <Joshua.Stephenson@pjm.com>; Affleck, Jonathon <Jonathon.Affleck@pjm.com>; Fernandes, Anisha <Anisha.Fernandes@pjm.com>; Awasthi, Shekhar R <Shekhar.Awasthi@pjm.com>; Del Olmo, Rizki <Rizki.DelOlmo@pjm.com>; will.chung@oklo.com <[REDACTED]@oklo.com>; trevor.curry@oklo.com <trevor.curry@oklo.com>**Subject:** RE: C01-1735 - [REDACTED] Deficiencies

Hi Grant and thank you for the email. I understand that Oklo does not intend to be a Transmission Owner.

PJM does not have a load or co-located load queue at this time. The C01-1735 request is only for studying the generation portion of the project and all that is required for the generation interconnection.

In regards to the 500 kV substations, PJM and Dominion ultimately need to know the final requested configuration for the generation interconnection. If this includes the 500 kV switching station and the 500 kV intermediate switching station, PJM will proceed with the information as submitted and include the connections that are needed for the generation. If Oklo wishes to change this configuration, please do so now and provide an updated single line diagram by the close of this Thursday, 6/11/2026. If the configuration changes, please also be sure to include any updated dynamic modeling files and attachment line impedance changes.

Additionally, can you please clarify how NOVEC is involved in this request?

Thank you,

Kyle Copeland

From: Grant Wollam <gwollam@founddigitalllc.com>
Sent: Tuesday, June 9, 2026 12:10 PM
To: Copeland, Kyle <Kyle.Copeland@pjm.com>
Cc: Stephenson, Joshua <Joshua.Stephenson@pjm.com>; Affleck, Jonathon <Jonathon.Affleck@pjm.com>; Fernandes, Anisha <Anisha.Fernandes@pjm.com>; Awasthi, Shekhar R <Shekhar.Awasthi@pjm.com>; Del Olmo, Rizki <Rizki.DelOlmo@pjm.com>; will.chung@oklo.com; trevor.curry@oklo.com
Subject: Re: C01-1735 - [REDACTED] Deficiencies

⚠ External Email! Think before clicking links or attachments.

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Kyle,

Thanks for the useful information. The campus has been preliminarily designed as a co-located generation and load (data center) project. The design currently shows 2no. 500kV switchyards. Switchyard 1 is tied to the utility line, the data center campus, and Switchyard 2. Switchyard 2 is tied to Switchyard 1, and the three generation (customer owned) substations. I see your point, that there is confusion on what would be owned by the TO vs. customer, specifically regarding Switchyard 2.

However, it is reasonable to see if we can combine these into one switchyard to reduce overall project cost. We were not sure how PJM/Dominion/NOVEC would require the setup to be for the both the generation side and load side of the campus, so this was our preliminary design. We are open to whichever option is best for the utility. Oklo does not intend to be a NERC Registered TO, so it makes sense to see if we can reduce this to ultimately have just one 500kV switchyard, which is connected to the utility line, data center campus, and generation substations (customer owned), or to have the TO own/operate Switchyard 2. There has also been discussion on load side handoff, and it's likely that Dominion/Novec would require a 230 or 34.5kV handoff instead of 500kV, however we understand that is out of PJM's scope at this time.

We'd be happy to discuss this prior to the kickoff call if the PJM team would like to do so. Let us know if you'd like to set up a meeting or if any immediate updates are needed prior to further discussions.

Best Regards,

 image.png

Grant Wollam, PE

Senior Power Systems Engineer

M: (229) 869-7067

E: gwollam@founddigitalllc.com

FoundDigital LLC

Registered Office: 5511 Parkcrest Dr., Suite 103, Austin, TX 78731

From: Copeland, Kyle <Kyle.Copeland@pjm.com>
Date: Tuesday, June 9, 2026 at 10:17 AM
To: Grant Wollam <gwollam@founddigitalllc.com>
Cc: Stephenson, Joshua <Joshua.Stephenson@pjm.com>; Affleck, Jonathon <Jonathon.Affleck@pjm.com>; Fernandes, Anisha <Anisha.Fernandes@pjm.com>; Awasthi,

Shekhar R <Shekhar.Awasthi@pjm.com>; Del Olmo, Rizki <Rizki.DelOlmo@pjm.com>;
will.chung@oklo.com <will.chung@oklo.com>; trevor.curry@oklo.com <trevor.curry@oklo.com>
Subject: RE: C01-1735 - [REDACTED] Deficiencies

Good morning,

PJM has identified an additional deficiency that will need clarification/correction/additional discussion regarding the C01-1735 [REDACTED]. The single line diagram shows a 500 kV intermediate substation between the 500 kV switch step-up station. This intermediate substation is non-standard for generation interconnection requests. Because of this, additional Transmission Owner coordination will likely be required. At this time, only the work required for the generation interconnection will be scoped as a part of this request, of which, C01-1735 will have full cost responsibility including the construction of two 500 kV substations.

The Project Developer has full responsibility of the design proposed for this project, however to simplify this design, has consideration been given to have the 500 kV line taps feeding directly into the 500 kV intermediate substation which would only require the construction of one substation at this time?

Additionally, this 500 kV intermediate substation has the potential to have network flows through it. Can OKLO please confirm their intention of who will own this switching station? If this is an Oklo owned substation, due to the potential network flows, this substation will require Oklo to become a NERC registered transmission owner where visibility of the circuit breakers is provided to PJM. If Oklo does not intend to own this substation, as mentioned above, Dominion will have to be consulted as to the feasibility of this type of installation. Please clarify Oklo's intention for this substation and becoming a NERC registered transmission owner.

Please let me know if you have any questions.

Thank you,

Kyle Copeland

From: Grant Wollam <gwillam@founddigitalllc.com>
Sent: Monday, May 18, 2026 10:30 AM
To: Stephenson, Joshua <Joshua.Stephenson@pjm.com>
Cc: Will Chung <will.chung@oklo.com>; Trevor Curry <trevor.curry@oklo.com>
Subject: C01-1735 - [REDACTED] Deficiencies

 External Email! Think before clicking links or attachments.

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Hi Joshua,

I am working on resolving the deficiencies for the C01-1735 - [REDACTED] PJM generation application. I had the following questions:

1. What date are the deficiencies required to be resolved by?
2. Can you confirm that the transformers should be Wye-grounded / Wye-grounded per Dominion Energy requirements? I previously had Delta / Wye-grounded.
3. I originally tried to input the Fuel Cell data as a Fuel Cell in NextGen, but the parameters allowed for entry were identical to a synchronous generator, so they did not make sense for a fuel cell (IBR). The closest option was a solar generator, so that is how I entered them. This has still not been fixed in NextGen. The Fuel Cell option needs to be fixed in NextGen to be reflective of an inverter-based resource like a Fuel Cell, or the parameters I enter will not

make any sense (for example, a fuel cell has no value for generator inertia-H). If not, please advise on how I should proceed.

4. Under Additional comments - "Short Circuit Data is Deficient" - can you clarify where this needs to be updated and what it is for? Equipment, PSSE, NextGen application, etc.

Best Regards,

 image.png

Grant Wollam, PE

Senior Power Systems Engineer

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Registered Office: 5511 Parkcrest Dr., Suite 103, Austin, TX 78731

Attachments:

image001.png 1.3M

image.png 1.3M

SLD 53F103-FDL-XX-XX-SC-E-00002-R2.pdf 418k



Will Chung <will.chung@oklo.com>

NextGen - Data for C01-1735 has been changed by PJM Personnel

1 message

NextGen <nextgen-donotreply@pjm.com>

Thu, Jun 18, 2026 at 12:25 PM

To: mike@oklo.com, will.chung@oklo.com

Cc: joshua.stephenson@pjm.com

A change has been made by PJM on an application for **C01-1735**

Field	Old Value	New Value
GSU8 and GSU9 - MVA Base	200	4
GSU8 and GSU9 - Identical Transformers	60	120

PJM has made this change because: **The single line shows 60 units for Fuel Cells 1 and an additional 60 units for Fuel Cells 2 hence 120 units in total. Each GSU is 4 MVA.**

You are required to provide your approval or denial within five (5) business days by responding directly to your project manager. If no response is received within this timeframe, the change will be considered **approved by default**.

Note: This is an auto-generated email. Do not reply to this email.



Will Chung <will.chung@oklo.com>

Kickoff Call for C01-1735 - PJM / Dominion / Oklo Power LLC

3 messages

Joshua.Stephenson@pjm.com <Joshua.Stephenson@pjm.com>
To: will.chung@oklo.com

Fri, Jun 19, 2026 at 12:39 PM

Hello Will Chung,

PJM is actively reviewing your Cycle 01 interconnection request submission and preparing to schedule project scoping (i.e., kick-off) calls, which we anticipate beginning in the coming weeks.

Given the high volume of projects received, PJM is seeking to streamline the scoping process while maintaining the technical integrity of the studies. In accordance with **PJM Tariff, Part VIII, Subpart B, Section 403(C)**, scoping meetings are optional and may be waived at the discretion of the Applicant and Transmission Owner.

The purpose of the scoping call is to confirm the project details entered in NextGen. These calls will be limited to approximately 15 minutes and will focus only on key information required to initiate the Phase I study. Broader questions regarding the interconnection process or cost estimates will not be addressed during this call.

At this time, we ask that you review your project information in NextGen, with particular attention to:

- Point of Interconnection
- Generator size (Maximum Facility Output and Capacity Interconnection Rights)
- Fuel type and associated technical parameters

PJM will rely on the information as submitted in NextGen to develop the Cycle 01 study model and perform all required analyses.

If you elect to **waive the scoping call** and proceed directly into Phase I using the currently submitted project data, please confirm by replying to your assigned Project Manager no later than **Wednesday, June 24, 2026**. PJM will evaluate the scoping call waiver requests with the Transmission Owners. Scoping calls will only be waived if all three parties agree (Project Developer, Transmission Owner, PJM).

If we do not receive a response by this date, PJM will proceed with scheduling a scoping call with you and the applicable Transmission Owner.

For efficiency, scoping calls will be grouped first by Transmission Owner zone and then by Developer. For example, projects within the same Transmission Owner zone (by the same Project Development company) may be discussed in a single call.

Thank you for your attention to this matter.

Best regards,

Josh Stephenson

Joshua.Stephenson@pjm.com

Will Chung <will.chung@oklo.com>

Mon, Jun 22, 2026 at 1:05 PM

To: Joshua.Stephenson@pjm.com

Bcc: Trevor Curry <trevor.curry@oklo.com>, Mike Donohue <mike@oklo.com>, Grant Wollam <gwollam@founddigitalllc.com>, Kimberly Crandall <kimberly@bastionrozele.com>

Hi Josh,

Oklo does not waive the scoping call and requests that we schedule one. Thank you so much!

[Quoted text hidden]

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Will Chung

Sr. Director, Grid Integration Strategy | Oklo

(714) 423-1799 | will.chung@oklo.com



Will Chung <will.chung@oklo.com>

Tue, Jul 21, 2026 at 12:24 PM

To: Joshua.Stephenson@pjm.com

Cc: Trevor Curry <trevor.curry@oklo.com>, Kimberly Crandall <kimberly@bastionrozelle.com>, Mike Donohue <mike@oklo.com>, Grant Wollam <gwollam@founddigitallc.com>

Hi Josh, will there be scoping call before July 27? Please advise. Thank you!

[Quoted text hidden]



Will Chung <will.chung@oklo.com>

NextGen - C01-1735 has been withdrawn

2 messages

NextGen <nextgen-donotreply@pjm.com>

Mon, Aug 3, 2026 at 6:18 AM

To: mike@oklo.com, will.chung@oklo.com

Cc: systemplanning.admin@pjm.com, joshua.stephenson@pjm.com

Dear Applicant,

Thank you for your interest in participating in PJM's Interconnection process.

After careful review of your Application, PJM regrets to inform you that your application, [C01-1735](#), has not demonstrated compliance with the requirements set forth in the PJM Tariff to continue study. As a result, your application has been withdrawn from further study.

Your submission has been withdrawn [C01-1735](#) for the following reason(s):

Deficient

Failed to meet Stability requirements

The dynamic modeling data provided with the initial application and resubmission were both deficient for failure to meet PJM's requirements. The second round issues include: numerous discrepancies between NextGen data fields and the models, the DMDG report and checklist were not provided, and the plant testing showed it was unstable.

Additional Comments:

6/16/2026 (LF-KJC): Load flow data is clear.

[6/18/2026 PJM-RDO]: Short Circuit data is clear.

6/24/2026 (SRA- PJM) : Stability data is deficient with the following outstanding deficiencies:

1. DMDG Report and checklist was not provided with the Round 2 data. Please ensure that the report includes all the required testing per the checklist.
2. In PSSE for the STG GSU1 the H-L and H-T windings are rated at 100 MVA while L-T is rated at 200 MVA. In Nextgen, all windings are rated at 200 MVA even though the impedances match between the two sources. If the windings have different ratings, the impedances need to be converted to the common base before entering into Nextgen.
3. Aux loads for Fuel Cells do not align between Nextgen (1MW,4Mvar) and PSSE (4 MW,1Mvar).
4. Reactive capability for the fuel cell units appears to not line up with Round 1 dynamic model report PQ curve. Each inverter should be capable for 189.8 kVAR which amounts to +/- 113.88 Mvar aggregate. PSSE case has 106.3, -104.4 Mvar as the limits entered. Please check.
5. A 5 cycle 3-phase fault was performed at the POI. The plant was unstable for the 20 second simulation. The developer should check the dynamic model parameters and test the SMIB case to ensure it remains stable for such scenario.

All identified deficiencies contained in your Application have been documented in NextGen and will remain available for your review. PJM has provided this access to assist applicants who may wish to continue developing their projects, address outstanding deficiencies, and reapply in a future submission.

PJM will not be conducting individual discussions regarding its determination for applications that have been withdrawn from study consideration. If you are eligible for a refund, complete the [Wire Verification Form](#) and email to SystemPlanning.Admin@pjm.com.

Your project refund will be processed after PJM receives the completed Wire Verification Form and the applicable billing process has concluded.

Thank you for your interest in PJM.

Regards,
PJM Planning

Note: This is an automated email. Please do not reply to this message.

Will Chung <will.chung@oklo.com>

Wed, Aug 5, 2026 at 1:28 PM

To: Vivek Narayanadas <vivek@oklo.com>, Mike Donohue <mike@oklo.com>, Adrienne Schweer <adrienne@oklo.com>

[Quoted text hidden]

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Will Chung

Sr. Director, Grid Integration Strategy | Oklo

(714) 423-1799 | will.chung@oklo.com





Vivek Narayanadas <vivek@oklo.com>

[URGENT] Request the immediate reinstatement of the [REDACTED] and [REDACTED] projects to address PJM's critical regional supply and demand

Bielak, Donnie <Donnie.Bielak@pjm.com>

Fri, Aug 7, 2026 at 2:29 PM

To: Mike Donohue <mike@oklo.com>

Cc: "Shoemaker, Jason R." <Jason.Shoemaker@pjm.com>, Will Chung <will.chung@oklo.com>, Trevor Curry <trevor.curry@oklo.com>, Vivek Narayanadas <vivek@oklo.com>, Jacob DeWitte <j@oklo.com>, Adrienne N Schweer <adrienne@oklo.com>, "Krizenoskas, Lisa" <Lisa.Krizenoskas@pjm.com>

Hi Mike,

Upon further review of your C01-1735 and C01-2157 projects, PJM has come to the following conclusions:

For the [REDACTED] (C01-2157) project, we can agree to accept your submission into Cycle 1 with some clarifications regarding the summer PQ curves provided. Specifically please verify, (i) the PQ curves were provided by the manufacturer because we have some concerns about the generator capability increasing at higher temps and (ii) which of the 4 summer temperature PQ curves should be used for the MFO and reactive power assessment.

For the [REDACTED] (C01-1735) project, this withdrawal is still appropriate. You were not able to demonstrate stability for all fuel types through the low voltage ride through (LVRT) test per the DMDG Guideline.

Please refer to Tariff, Part VIII, section 403(B) which governs the deficiency review process. In accordance with that process, an Applicant has 10 Business Days to respond to the deficiencies identified by PJM, and then PJM must use Reasonable Efforts to review Applicant's response within 15 Business Days, and then "either validate or reject the Application." The deficiency review process set forth in the Tariff does not afford an Applicant with another opportunity to cure deficiencies that remain following a Project Developer's deficiency response. Tariff, Part VIII, section 403(B). Accordingly, New Service Request C01-1735 was withdrawn from Cycle 01.

Please reach out to your PJM Project Manager for the clarifications required for C01-2157 in order to reinstate this project into Cycle 1.

Thank you.

Donnie Bielak

610-666-4734

donnie.bielak@pjm.com

From: Mike Donohue <mike@oklo.com>
Sent: Tuesday, August 4, 2026 6:17 PM
To: Bielak, Donnie <Donnie.Bielak@pjm.com>
Cc: Shoemaker, Jason R. <Jason.Shoemaker@pjm.com>; Will Chung <will.chung@oklo.com>; Trevor Curry <trevor.curry@oklo.com>; Vivek Narayanadas <vivek@oklo.com>; Jacob DeWitte <j@oklo.com>; Adrienne N Schweer <adrienne@oklo.com>
Subject: Re: [URGENT] Request the immediate reinstatement of the [REDACTED] projects to address PJM's critical regional supply and demand

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Donnie,

Thank you and appreciate your review on these projects. Below provides a bit more insight for each project and the areas that appear to have been mis-read by the project manager.

Summary

On August 3, 2026, PJM moved the [REDACTED] applications directly from "submitted" to "withdrawn" status. O [REDACTED] at either project was at risk of withdrawal. From Oklo's perspective, both projects had cured every deficiency PJM had communicated, and in each case the last exchange with PJM was a confirmation of receipt or an unanswered submission from Oklo. In NextGen's system, all deficiency flags, even when cured, remain, but they are coded green, so there is not a clear designation of what remains without a response from PJM staff via email.

- [REDACTED]
1. On first submission, Oklo identified and disclosed to PJM that the NextGen portal cannot properly accommodate fuel cells as a generation type. The Fuel Cell entry tab is identical to the synchronous generator entry tab, but fuel cells are an inverter-based resource and share none of the relevant technical characteristics of a synchronous generator. Oklo's engineering team concluded that entering the units under the solar generator tab would give PJM more accurate parameters, since the correct fields were available there. At the first review period PJM acknowledged the portal issue and instructed Oklo to enter the fuel cells using synchronous generator parameters instead.
 2. PJM's initial deficiency comments, provided by email on May 15, noted that the fuel cells entered momentary cessation during a fault test. Oklo updated the PSSE .dyr file and cured that deficiency. PJM noted that the model was unstable under a fault test. When Oklo reviewed that comment on August 3, it traced the issue to the gas turbine generator power system stabilizer and corrected it. Under PJM's dynamic modeling guidelines, only inverter-based resources (here, the fuel cells) are required to undergo fault testing. PJM tested only the fuel cells in the first review, then fault-tested the entire facility, including equipment not subject to that requirement, in the second.
 3. The deficiencies flagged in this review process are related to stability studies, which are conducted in the second study phase. It is unclear why this was flagged.
- [REDACTED]

1. PJM's stated reason was: "There are discrepancies between the modeling files, NextGen, and PQ curves that were not resolved even after following up over email. The provided PQ curves (rated load point 109.75 MVA) appear to be for a different machine than the one used in the project. We do not have data to reliably model this project based on what was provided."
2. PQ curve was accepted on every other Oklo project. In late May and early June, each of Oklo's Cycle 01 projects received a similar deficiency concerning the temperature at which the PQ curve was provided. Oklo responded across all projects with an updated PQ curve at the correct temperature. That curve is for the identical Siemens machine (SGen6-100A-2P) used at [REDACTED]. The rated load point differs because the same machine is rated at different MVA depending on specific design, and the curve lists PQ derating in per unit precisely so that the setpoints at any applicable MVA value can be derived directly from it.

Mike

Michael Donohue

VP Power Origination & Energy Strategy | Oklo

201-835-8463 | Mike@oklo.com

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Document Content(s)

Oklo Emergency Complaint (PUBLIC).pdf.....	1
Attachment C (PUBLIC).pdf	77
Attachment D (PUBLIC).pdf	78
Attachment E (PUBLIC).pdf	79
Attachment F (PUBLIC).pdf	81
Attachment G (PUBLIC).pdf	84
Attachment H (PUBLIC).pdf	88
Attachment I (PUBLIC).pdf	89
Attachment J (PUBLIC).pdf	91
Attachment K (PUBLIC).pdf	93