

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

PJM Interconnection, L.L.C.	)	Docket Nos. EL25-49-000
	)	EL25-49-001
	)	EL25-49-002
	)	
	)	
PJM Interconnection, L.L.C.	)	Docket No. ER26-1479-000
	)	

**MOTION FOR LEAVE TO ANSWER AND ANSWER OF PJM
INTERCONNECTION, L.L.C.**

PJM Interconnection, L.L.C. (“PJM”), pursuant to Federal Energy Regulatory Commission (“Commission” or “FERC”) Rules 212 and 213 of Practice and Procedure,¹ respectfully moves² to answer the limited protests filed in response to PJM’s August 17, 2026 compliance filing (“August Filing”).³ Several parties filed limited protests concerning discrete aspects of the August Filing.⁴ PJM provides this answer to clarify the

¹ 18 C.F.R. §§ 385.212, 385.213.

² Good cause exists for the Commission to permit PJM’s answer. The Commission routinely accepts answers to comments and protests when doing so will ensure a more accurate and complete record or will assist the Commission in its deliberative process by clarifying the issues. *See, e.g., PJM Interconnection, L.L.C.*, 139 FERC ¶ 61,165, at P 24 (2012) (accepting answers to a protest because “they have provided information that assisted [the Commission] in [its] decision-making process”); *PJM Interconnection, L.L.C.*, 158 FERC ¶ 61,133, at P 12 (2017) (accepting answers to protests because they provided information that assisted in the Commission’s decision-making process); *PJM Interconnection, L.L.C.*, 104 FERC ¶ 61,031, at P 10 (2003) (accepting answer because “it will not delay the proceeding, will assist the Commission in understanding the issues raised, and will [e]nsure a complete record upon which the Commission may act”). These criteria are met here as this submission addresses a number of substantive comments and protests on issues pending before the Commission for potential resolution. PJM respectfully requests that the Commission grant its Motion because the Answer will help clarify the record and contribute to an understanding of the issues.

³ *PJM Interconnection, L.L.C.*, Compliance Filing of PJM Interconnection, L.L.C. in Response to Order on Rehearing, Clarification, Compliance Filing, and Paper Hearing in Docket Nos. EL25-49-002, et al., Docket Nos. ER26-1479-002, et al. (Aug. 17, 2026).

⁴ *PJM Interconnection, L.L.C.*, Limited Protest and Comments of Constellation Energy Generation, LLC, Docket Nos. EL25-49-002, et al. (Sep. 8, 2026) (“Constellation Limited Protest”); *PJM Interconnection, L.L.C.*, Limited Protest of American Municipal Power, Inc., Docket No. ER26-1479-002 (Sep. 8, 2026) (“AMP Limited Protest”); *PJM Interconnection, L.L.C.*, Joint Comments and Limited Protest of Industrial Customer Organizations and Amtrack to PJM Interconnection, L.L.C.’s August 17, 2026, Compliance Filing, Docket Nos. ER26-1479-001, et al. (Sep. 8, 2026) (“Amtrack Limited Protest”).

record on certain issues raised in this proceeding. As discussed below, there are certain aspects of the language proposed for PJM's Open Access Transmission Tariff ("Tariff") that may benefit from a more complete record that the additional changes being proposed in November will provide. Thus, although PJM had requested an effective date of October 17, 2026, for the changes to Tariff, Parts I, III, VI, VIII, and IX in the August Filing, it may be appropriate for the Commission to defer consideration of these issues until it has the benefit of a complete record following next month's compliance filing.

I. ANSWER

A. PJM's Proposed Effective Date for Interim NITS

Constellation Energy Generation, LLC ("Constellation") avers the July 1, 2028 effective date for Interim Network Integration Transmission Service ("NITS")⁵ in the August Filing is unsupported and neglects to give "serious consideration" to more expedited implementation.⁶ That is simply not the case. As stated in the August Filing, PJM's operations personnel will need to implement a number of additional tools and processes to enable the automated provision of Interim NITS.⁷ This is a significant undertaking. As more fully explained in the Affidavit of Christopher Pilon provided herewith as Attachment A, providing Interim NITS with the assistance of automation will require PJM to make significant modifications to its forecasts, operations, markets, and settlement systems.⁸ PJM anticipates significant demand for Interim NITS that would necessitate automation to be implemented efficiently.⁹ PJM's systems do not currently

⁵ Capitalized terms not otherwise defined herein shall have the meaning in PJM's Tariff or August Filing.

⁶ Constellation Limited Protest at 2-3.

⁷ August Filing, Transmittal Letter at 23.

⁸ Affidavit of Christopher Pilon (Attachment A) at ¶¶ 5-22, 30-37 ("Pilon Aff.").

⁹ Pilon Aff. at ¶ 5.

have the ability to track individual large loads, associate those loads with a specific transmission service reservation, track service limits for a particular reservation, and direct curtailment down to an individual reservation.¹⁰ Therefore, PJM will have to make significant changes to its system to provide Interim NITS.¹¹ Constellation suggests that PJM should be in a position to implement this service on the same timeframe PJM proposed to implement its proposed Interim Resource Adequacy Service (“IRAS”).¹² IRAS was proposed to be implemented on an aggregate, zonal basis using largely existing tools, whereas Interim NITS curtailment will occur on an individual transmission service request basis and requires entirely new tools and automation.¹³

Since the August Filing, PJM has further refined the timeline for making the requisite system changes to accommodate Interim NITS. Currently, PJM anticipates modifying the systems needed to begin accepting requests for the new transmission services in September of 2027. PJM is developing a proposal for a new a study process that would evaluate large loads and generation interconnection requests together in a unified cluster study that would take roughly a year to complete.¹⁴ PJM plans to file that proposal on or before November 16, 2026, in response to the Large Load Show Cause Order. Assuming the Commission accepts that proposal, PJM anticipates opening the

¹⁰ Pilon Aff. at ¶¶ 28-30.

¹¹ Pilon Aff. at ¶¶ 16-20, 30-37.

¹² Constellation Limited Protest at 3-5; *see PJM Interconnection, L.L.C.*, Proposal of PJM Interconnection, L.L.C. to Establish Interim Resource Adequacy Service and a Large Load Registry to Address System Reliability, Docket No. ER26-3515-000 (Aug. 13, 2026).

¹³ Pilon Aff. at ¶¶ 27-40.

¹⁴ *See* Donnie Bielak, Director, Interconnection Planning, *Show Cause for Large Loads Framework*, PJM Interconnection, L.L.C. (Sep. 16, 2026), <https://www.pjm.com/-/media/DotCom/committees-groups/workshops/ellsco/2026/20260916/20260916-item-03---show-cause-for-large-loads-approach---presentation.pdf> [<https://perma.cc/44V9-48WU>].

application process in September of 2027, conducting the study in 2028, and beginning to provide service in first quarter 2029.¹⁵ PJM remains committed to continuing to explore ways to promptly implement the new Commission-directed transmission services, including the feasibility of implementing disfavored options that rely on more manual processes as opposed to automated processes.¹⁶

B. Necessary Study Process

Constellation asks the Commission to order PJM to clarify that Necessary Studies need not be repeated where the scope of the previously conducted study has not changed.¹⁷ As Constellation notes, however, the Commission clarified in the June Hearing Order that the scope of the Necessary Study process should not change.¹⁸ While PJM will not repeat studies already performed, project scope or other technical changes may trigger the need for additional study. By way of example, if a generator elects to reduce its Capacity Interconnection Rights (“CIR”) consistent with the Commission’s directives as part of a co-located load arrangement, but that CIR reduction was not previously communicated to PJM and thus not studied, the impact of that CIR reduction will have to be assessed.

C. Transmission Owner Technical Requirements

Constellation claims PJM added language regarding complying with the Transmission Owner’s technical requirements in Tariff Part XI section 702.4 for Interim NITS without the Commission ordering it to do so.¹⁹ That is incorrect. The June Hearing Order clarified that the provision of any new transmission service must be compliant with

¹⁵ *See id.*

¹⁶ Pilon Aff. at ¶¶ 5, 9.

¹⁷ Constellation Limited Protest at 5.

¹⁸ *Id.* (citing *PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,209, at P 283 (2026) (“June Hearing Order”).

¹⁹ Constellation Limited Protest at 7-8.

both PJM's and the Transmission Owners' technical requirements to limit withdrawals from the system.²⁰ Interim NITS is such a service, as customers must be able to limit their withdrawals from the system consistent with the existing system limits (i.e., prior to the completion of network upgrades needed to provide NITS).²¹ Therefore, PJM appropriately added this language to the Proposed Part XI, section 702.4 in the August Filing.

D. Interim NITS And Resource Adequacy

Constellation expresses concern that PJM will limit the provision of Interim NITS due to resource adequacy considerations.²² That is not the case. The August Filing specified that PJM will provide Interim NITS consistent with system reliability.²³ In evaluating a request for Interim NITS, PJM will examine the ability of the system to provide some level of deliverability for a service request while maintaining the reliability of the system.²⁴ Consistent with the Commission's orders, the August Filing specified that Interim NITS will be interruptible and curtailed before firm services like Firm Contract Demand Service or NITS that are capacity-backed services.²⁵ In the event of a capacity shortage, Interim NITS will be curtailed before capacity-backed services during operations.²⁶

²⁰ June Hearing Order at PP 458, 486-87.

²¹ See August Filing, Attachment A (Proposed Marked Tariff) at Part XI, section 705.1.

²² Constellation Protest at 8-9.

²³ August Filing, Attachment A (Proposed Marked Tariff) at Part XI, section 702.3.

²⁴ *Id.*

²⁵ See August Filing, Attachment A (Proposed Marked Tariff) at Part XI, section 705.1.

²⁶ August Filing, Attachment A (Proposed Marked Tariff) at Part XI, section 705.2.

E. Partial NITS

Constellation seeks clarification regarding the statement in the August Filing concerning the provision of partial NITS (i.e., NITS in an amount less than requested or for a term shorter than requested).²⁷ PJM clarifies that this is existing NITS under Part III of the Tariff. When applying for NITS under Part III of the Tariff, an Eligible Customer provides a description of Network Load at each delivery point, including forecasted total load over a ten-year period.²⁸ To the extent PJM cannot meet the full requested schedule for commencement of service, PJM instead provides the available amount of full NITS service it can provide based on available transfer capability.²⁹

F. Behind The Meter Generation (“BTMG”) Issues

1. An Interconnection Service Agreement does not disqualify from netting.

National Railroad Passenger Corporation (“Amtrak”) and various industrial customers express concern that the definitions PJM proposed may somehow disqualify industrial customers that sell surplus energy to the grid from netting their load under their existing BTMG arrangements.³⁰ This matter is premature and beyond the scope of the pending compliance filing. PJM has proposed no such restriction nor does it intend to include such a restriction in its upcoming compliance filing. PJM posted draft Tariff language to implement the BTMG netting provisions for stakeholder feedback in advance of the upcoming November compliance filing.³¹ The draft Tariff language includes

²⁷ Constellation Limited Protest at 6-7.

²⁸ Tariff, Part III, section 29.2(iii).

²⁹ Tariff, Part III, section 29.2A.

³⁰ See Amtrak Limited Protest at 8-10.

³¹ PJM Interconnection, L.L.C., *PJM draft Tariff language, subject to change Draft Retail BTMG language for November 2026 filing* (Sep. 16, 2026), <https://www.pjm.com/-/media/DotCom/committees->

grandfathering provisions for existing commercial arrangements, co-generation, and a transition period.³² It does not exclude based on whether the load has an Interconnection Service Agreement. However, given the confusion surrounding eligibility for netting, PJM intends to propose clarifications to the definition of BTMG in the November compliance filing to specify that load with BTMG is excluded from the definition of Co-Located Load. PJM will continue to engage with stakeholders on this issue in advance of the November filing.

2. *PJM agrees that a clarification of the defined term, “Eligible Generating Facility” is warranted.*

American Municipal Power, Inc.’s (“AMP”) limited protest avers that the proposed definition of an “Eligible Generating Facility” may disqualify Non-Retail BTMG from qualifying for use of the new transmission services.³³ The August Filing made the new interim NITS available to Eligible Customers taking service on behalf of Eligible Load, which was defined to include both Co-Located Load and load connected to Behind the Meter Generation.³⁴ PJM did not intend to exclude Non-Retail Behind the Meter Generation from eligibility for the new transmission services. Accordingly, PJM, does not object to AMP’s proposed revision to Eligible Generating Facility definition set forth in its pleading.³⁵ However, any Eligible Customer taking interim NITS to serve load with Non-Retail Behind the Meter Generation will need to meet the operational requirements

groups/workshops/cllsco/2026/20260916/20260916-item-02---oatt-342-revisions---redline.pdf
[<https://perma.cc/AP3E-8LRH>].

³² *Id.*

³³ AMP Limited Protest at 5-6.

³⁴ August Filing, Attachment A (Proposed Marked Tariff) at Definitions A-B (Behind the Meter Generation).

³⁵ AMP Limited Protest at 7.

associated with that service set forth in the Tariff (e.g., limit withdrawals from the transmission system).

II. CONCLUSION

Based on the foregoing, PJM requests that the Commission grant PJM's motion for leave to answer and accept the foregoing answer and affidavit.

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Respectfully submitted

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October 14, 2026

***Counsel for
PJM Interconnection, L.L.C.***

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served the foregoing document on each person designated on the service list compiled by the Secretary in these proceedings.

Dated at Washington, DC on this 14th day of October 2026.

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Attachment A

Affidavit of Christopher Piong Senior Director, Operations Planning

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PJM Interconnection, L.L.C.	)	Docket No. ER26-1479-000

**AFFIDAVIT OF CHRISTOPHER PILONG
ON BEHALF OF PJM INTERCONNECTION, L.L.C.**

1. My name is Christopher Pilonig and my business address is 2750 Monroe Blvd., Audubon, Pennsylvania 19403. I am the Senior Director, Operations Planning at PJM Interconnection, L.L.C. (“PJM”). In that role, I am responsible for functions that support the reliable planning and preparation of PJM’s bulk electric system for real-time operations. My responsibilities include oversight of operational studies, processes, tools, and coordination activities with Generation Owners, Transmission Owners and neighboring entities, as well as gas-electric coordination with the natural industry.
2. I am submitting this affidavit in support of PJM’s proposed revisions to the PJM Open Access Transmission Tariff (“Tariff”) filed August 17, 2026, to comply with the Federal Energy Regulatory Commission’s (“Commission”) directives in its June 18, 2026 order,¹ including the directive to reconsider the proposed effective date for PJM to offer the new transmission services for Eligible Customers taking service on behalf of Co-Located Load and load with Behind the Meter Generation. Because PJM has to date only proposed Tariff language for Interim Network Integration Transmission Service (“NITS”), my affidavit is limited to addressing implementation of that service.
3. In this affidavit, I explain:
 - The operational complexities associated with implementing Interim NITS on an automated basis and scope of changes on PJM’s systems that will be needed to accommodate automated provision of Interim NITS and the anticipated timing of implementing those changes.
 - Why the timeline PJM proposed for Interim Resource Adequacy Service (“IRAS”) implementation is not comparable to Interim NITS.
4. This affidavit addresses implementation rather than the legal merits of any particular Tariff design. Because the Commission has not yet issued an order and final Tariff language, implementation requirements will depend on the terms of the

¹ *PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,209 (2026).

order, including eligibility, priority, duration, curtailment standards, notice requirements, transition rules, settlement treatment, and the relationship of these services to existing transmission and market obligations.

5. As explained below, PJM should not treat the implementation of Interim NITS as a simple Tariff or software-configuration change. PJM expects to receive significant interest in customers taking Interim NITS. Given the anticipated level of demand, there is significant value in incorporating Interim NITS into PJM's existing automated systems and processes. Providing Interim NITS on an automated basis involves introducing a new operational status that must remain consistent across planning, market, scheduling, outage, reliability, dispatch, settlement, and customer-facing processes.

I. OPERATIONAL DESIGN AND PROCEDURE CHANGES

6. Once the Commission approves proposed Tariff language, PJM first would need to convert the Commission's requirements into objective and auditable operating rules. Those rules would need to define when service is available, the transmission capability that supports it, the events that permit or require curtailment, the sequence and priority of curtailment, restoration criteria, customer notification, and the treatment of partial curtailments. The rules also would need to address conflicts among reliability directives, transmission service priorities, generation commitments, and market outcomes.
7. Existing operating agreements, manuals, desk procedures, emergency procedures, training materials, operator displays, alarm protocols, and shift turnover practices would require review and, in many cases, revision. PJM would need clear decision rights for declaring a qualifying condition, approving a curtailment, communicating the instruction, monitoring compliance, and restoring service. Procedures must work during normal operations, constrained operations, emergencies, restoration, and periods when communications or applications are degraded.
8. Interim NITS presents a number of implementation challenges. Network service ordinarily is embedded in network modeling, designation of network resources and load, transmission planning assumptions, scheduling rights, market participation, and long-term reliability obligations. An "interim" status therefore must be defined consistently across time horizons and must not inadvertently create rights, priorities, or planning assumptions beyond those authorized by the Commission.
9. Implementing this construct for Interim NITS would require exception management. Examples include late or inaccurate data, a customer's failure to curtail, a change in topology after the applicable study, overlapping transmission reservations, generator or transmission outages, load forecast error, restoration following a contingency, and a service period that crosses operating days or settlement intervals. Some manual workarounds may exist, but they are not preferable or durable substitutes for controlled and auditable production processes.

II. COORDINATION WITH TRANSMISSION OWNERS, GENERATION OWNERS, AND CUSTOMERS

10. Implementation of Interim NITS would require substantial coordination with PJM Transmission Owners. Transmission Owners would need to understand and support the service definitions, study assumptions, facility ratings, topology inputs, local operating procedures, switching implications, notification paths, and field execution responsibilities. Where a curtailment is intended to relieve a local or regional constraint, PJM and the affected Transmission Owner must agree on the relevant monitored facilities, contingencies, expected distribution factors, validation method, and restoration criteria.
11. Transmission Owner systems and procedures may require corresponding changes. These may include energy management system displays, outage coordination practices, control-center instructions, operator training, customer communications, and evidence retention. Differences among Transmission Owner footprints, legacy systems, and local procedures will require testing by affected zone rather than reliance on a single generic implementation.
12. Coordination with Generation Owners and other market participants also is necessary because new service states can alter commitment, dispatch, reserve procurement, congestion management, and outage assumptions. PJM would need to explain how a curtailment instruction interacts with generation dispatch instructions, must-offer or availability obligations, bilateral arrangements, and any generation or storage serving the affected load.
13. Customers receiving the service would need defined telemetry, metering, communications, scheduling, and response obligations. PJM would need validated points of contact available at all times, test protocols, escalation paths, and consequences for non-performance. Meter-data latency and granularity must be sufficient to determine whether the requested relief occurred and when it occurred.
14. A further implementation uncertainty is the identity and operational role of the new “Eligible Customer” that would take service on behalf of the underlying load. Depending on the final tariff construct, that entity may not be the load-serving entity, end-use customer, Transmission Owner, or market participant with which PJM currently exchanges operating instructions. PJM therefore would need to verify the entity’s legal and operational authority to act for the load; define its responsibilities relative to those other parties; establish secure, continuously staffed primary and backup communication channels; identify authorized contacts and escalation paths; and develop protocols for issuing, acknowledging, executing, and documenting curtailment and restoration instructions. PJM also would need to determine required telemetry, metering, scheduling, outage, cybersecurity, identity-management, and data-sharing arrangements; execute any necessary agreements or registrations; conduct communications and failover testing; train the parties; and confirm that an instruction to the Eligible Customer can be translated into timely, measurable action at the affected load. If the identity, authority, technical

capability, or relationship of the Eligible Customer to the underlying load is not known early in implementation, onboarding and certification could become a critical-path item and could extend the implementation schedule.

15. Reliability Coordinators and neighboring systems may also need notice where implementation changes interchange schedules, coordinated flowgate impacts, congestion management, or other interregional processes. Any external coordination must be aligned with applicable reliability standards and existing joint operating agreements.

III. TOOL AND SYSTEM IMPACTS

16. The affected technology footprint is broad. Detailed design would be required to identify the authoritative source for each service attribute and to ensure that status changes propagate consistently. At a minimum, PJM would need to assess and likely modify the following categories of tools:
 - Transmission-service request, study, reservation, and contract-administration applications, including customer-facing portals and study queues;
 - Network-model management, topology processing, facility-rating, contingency-analysis, and power-flow applications;
 - Energy management system and operator displays, including alarms, logs, switching and constraint information, and real-time security analysis;
 - Day-ahead and real-time market engines, unit commitment and security-constrained economic dispatch, reserve optimization, and pricing processes;
 - Load forecasting, interchange scheduling, and transmission loading relief or congestion-management processes;
 - Generation and transmission outage scheduling and outage-impact assessment tools;
 - Telemetry, metering, data historians, event logging, operator logs, and compliance evidence repositories;
 - Market settlements calculation and reporting systems; and
 - Data publication, market notifications, reporting, analytics, and customer-support tools.
17. PJM also would need end-to-end auditability. For each relevant interval, PJM should be able to reconstruct the authorized service level, transmission conditions, applicable curtailment priority, notices sent, operator actions, customer response, market results, and settlement treatment. That requirement implicates data retention, cybersecurity review, access controls, change management, and business-continuity testing.

IV. MARKET CLEARING, RELIABILITY AND SETTLEMENT IMPACTS

18. Market clearing requires a consistent representation of which load is firm, which load may be curtailed, when curtailment is available, and whether the curtailment is a pre-contingency control, a post-contingency action, or an emergency measure.

That representation can affect constraint formulation, load distribution, commitment, dispatch, reserve requirements, congestion, losses, prices, and interchange feasibility.

19. If the market engines assume curtailment that operators cannot execute with sufficient certainty or speed, the resulting solution could understate reliability needs. Conversely, excluding available curtailment from all market and reliability analyses could produce inefficient commitments or congestion outcomes. PJM therefore would need validated rules for when the service may be modeled, the confidence assigned to it, and any conservative operating margin required.
20. PJM also would need to determine whether and how curtailment affects locational marginal prices, make-whole payments, uplift, transmission charges, congestion rights, reserve or emergency compensation, deviation charges, and other settlement outcomes. The treatment must be internally consistent and understandable to market participants. PJM would need to update its settlement calculation and reporting systems to account for proposed differences between the settlements treatment for NITS and Interim NITS services. The systems Electric Distribution Companies (“EDCs”) and Load Serving Entities (“LSEs”) use to submit revenue quality metered load data will also need to be updated to allow differentiation of the metered load served under NITS service from the load served under Interim NITS service given the differing settlements treatment. Further, EDCs and LSEs will need to develop their own procedures to track and report the load of end-use customers taking the new transmission service to PJM distinctly from those using regular NITS service.
21. Reliability studies would need to evaluate contingencies in which the curtailable load does not respond, responds only partially, or is unavailable because of communications, equipment, or customer conditions. Operators would need alternative actions for such failures. The design also should avoid dependence on a single point of failure and should define how service is suspended during tool outages or uncertain system conditions.
22. Implementation may require revisions to model-development schedules, case-building processes, seasonal and near-term studies, operator drills, and reliability assessments. The interaction with generator deactivations, new resource interconnections, load additions, transmission upgrades, and temporary operating guides must be evaluated so that interim service does not obscure an emerging reliability need.

V. IMPLEMENTATION SCHEDULE

23. Assuming a Commission order provides sufficiently complete direction and does not require immediate service, I estimate that a controlled production implementation would require approximately **18 to 24 months after the later of (a) issuance of a final, non-ambiguous order and (b) availability of final tariff language and business requirements.** A narrower implementation for a very

limited number of pre-identified customers could potentially be staged earlier, but only if reliability protections, manual controls, and scope limits are expressly defined. A materially broader or differently designed service could require more than 24 months.

24. An indicative schedule is as follows. Activities would overlap, and later phases depend on timely resolution of policy questions:
 - i. **Order analysis and requirements confirmation — approximately 0 to 3 months.** Interpret the order; identify affected tariff, manual, agreement, and reliability provisions; resolve ambiguities; define eligibility, priority, curtailment, restoration, data, and settlement rules; establish governance and implementation scope.
 - ii. **Detailed process and solution design—approximately 2 to 6 months.** Map end-to-end processes; complete reliability and market-impact analyses; define data ownership and interfaces; develop exception handling; coordinate with Transmission Owners, Generation Owners, customers, and neighboring entities.
 - iii. **Development and procedure revision—approximately 5 to 14 months.** Configure or develop affected applications and interfaces; revise manuals, desk procedures, forms, operating agreements, training, notifications, reports, and customer materials; establish telemetry and metering requirements.
 - iv. **Integrated testing—approximately 12 to 18 months.** Perform component, interface, regression, cyber, performance, failover, settlement, and zone-specific Transmission Owner testing; correct defects and repeat tests.
 - v. **Readiness, training, and controlled deployment—approximately 16 to 21 months.** Train and qualify operators and support staff; conduct drills; complete customer certification; verify round-the-clock contacts; execute cutover and rollback plans; begin with controlled enrollment where appropriate.
 - vi. **Stabilization and full production—approximately 21 to 24 months.** Monitor outcomes; reconcile market and settlement results; resolve defects; validate operational relief; complete post-implementation review; and expand only after readiness criteria are met.
25. This estimate assumes that PJM can assign adequate subject-matter experts and development capacity; affected Transmission Owners and customers make corresponding changes on schedule; required data and telemetry are available; no material rehearing or compliance-filing ambiguity delays final requirements; and the implementation can be coordinated with established market-model, software-release, training, and seasonal-readiness calendars.
26. Schedule risk would increase if the order requires service before necessary system changes are complete, applies broadly at inception, changes curtailment priority,

requires new optimization logic, alters pricing or settlement rules, depends on new telemetry or Transmission Owner functionality, or requires parallel implementation during a peak-season freeze or other major market release.

VI. DIFFERENCES FROM IRAS IMPLEMENTATION

27. Constellation Energy Generation, LLC (“Constellation”) incorrectly characterizes Interim NITS implementation as comparable to the implementation of the IRAS framework. The two initiatives differ materially in scope, operational complexity, required market system modifications, transmission service administration impacts, and reliability implementation requirements.
28. While IRAS primarily establishes a planning and accreditation framework that relies upon existing market and operational constructs, Interim NITS requires PJM to develop entirely new processes for administering, tracking, limiting, and curtailing transmission service associated with individual large load customers. Accordingly, the implementation timelines are not analogous.
29. Interim NITS requires PJM to manage transmission service at an Eligible Customer and transmission service request level, as opposed to zonal level. PJM’s current operating and emergency procedures are primarily designed around zonal load forecasting, zonal load management, and system-wide reliability actions. Under existing arrangements PJM forecasts load at the transmission zone level. In addition, capacity obligations are assigned at the zone and LSE level. Emergency load management actions are generally executed through zonal or broader reliability directives. Market systems clear generation against aggregate load forecasts rather than individual transmission customers.
30. Interim NITS introduces an entirely different construct requiring PJM to identify, monitor, and potentially curtail transmission service attributable to specific large loads. Unlike a zonal curtailment approach, customer-specific transmission service curtailments require various actions directed at the individual loads being served by Eligible Customers. This will require PJM to have the capability to identify the individual affected loads in the operations systems and track the transmission service rights associated with those loads. PJM will then need to have the capability to determine the customer-specific curtailment quantities, which will require further development of priority and allocation methodologies. PJM will also have to coordinate this implementation with the Transmission Owners. PJM will also need to have protocols to validate customer-specific exception conditions and take customer-specific actions in real time. These capabilities do not exist today within PJM’s operating platform and must be newly developed.
31. Implementation of Interim NITS requires significant modifications to several existing systems and business processes used to administer transmission service. Among other changes, PJM must develop capabilities to register and maintain Eligible Customers’ individual large loads, associate those loads with transmission service reservations, and track load-specific transmission service limits. PJM will

also need to establish curtailment eligibility criteria, create notification and communication protocols, and integrate transmission service information across planning, operations, and settlements systems. PJM will also need to develop auditable compliance records for transmission service administration.

32. These requirements represent a substantial departure from PJM's current transmission service framework, which was not designed to administer transmission service limitations on individual end-use customer loads. By contrast, IRAS largely leverages existing planning, capacity market, and resource accreditation processes.
33. PJM will have to modify the market-clearing engines to implement Interim NITS on an automatic basis. Constellation understates the degree to which Interim NITS affects PJM's market systems. To implement Interim NITS, PJM must evaluate modifications to both Day-Ahead and Real-Time market operations.
34. **Day-Ahead Market Impacts.** For implementation of Interim NITS in the Day-Ahead Market, PJM must make significant modifications to the current system. Moreover, to do so, PJM must determine a range of implementation details including how Interim NITS will be represented in the Day-Ahead load forecast, whether curtailment limitations affect demand bid treatment, and how transmission service restrictions impact commitment decisions. PJM will also need to determine how reliability commitments should account for potentially interruptible transmission service. The Day-Ahead market engine currently assumes load forecasts consistent with existing transmission service obligations. Introducing customer-specific transmission service constraints may require system design changes and extensive testing to ensure appropriate unit commitment outcomes.
35. **Real-Time Market Impacts.** The Real-Time implementation of Interim NITS presents additional complexity. To implement Interim NITS in Real-Time, PJM must determine various parameters for including Interim NITS in the Real-Time Market. For example, PJM must determine when customer-specific transmission service limitations become binding and how transmission service curtailments interact with dispatch and reserve commitments. PJM must also establish how operators will recognize and model curtailed load and how real-time telemetry and operational visibility requirements will be satisfied. PJM must also determine how reliability actions are coordinated with transmission owners and affected customers. Ultimately, the interaction between customer-specific transmission service restrictions and real-time security-constrained economic dispatch in implementing Interim NITS requires detailed design, testing, and validation to avoid unintended reliability consequences.
36. **Reliability Risks.** The reliability and operational risks associated with Interim NITS differ materially from those of IRAS. IRAS primarily affects resource accreditation and resource adequacy planning. Interim NITS directly affects real-time operational execution. Specifically, Interim NITS requires PJM to establish

customer-specific curtailment methodologies and reliability-based criteria to trigger those curtailment methodologies. Once those methodologies and criteria are established, PJM also must establish operator procedures and communication protocols for implementation, along with compliance and audit processes. Moreover, PJM must establish processes for coordination with the transmission owners and load-serving entities. As part of this effort, PJM will need to ensure appropriate dispute resolution mechanisms for transmission service administration because any errors in these processes could result in improper curtailment of transmission customers. Because Interim NITS directly impacts operational reliability actions, PJM must ensure comprehensive testing and validation prior to implementation.

37. **Software Development and Testing.** The software development needs and testing requirements to implement Interim NITS are also significantly greater than IRAS. Implementation of Interim NITS requires coordinated modifications across multiple platforms, including the transmission service systems, load forecasting systems, and customer registration systems. PJM will also have to modify its market clearing applications, operator tools, settlements systems, reporting and compliance systems, and the data interfaces with transmission owners. Each of these modifications requires requirements development, software design, coding, integrated system testing, market participant testing, operator training, and production deployment.
38. Unlike IRAS, which predominantly leverages established planning and capacity market constructs, Interim NITS introduces entirely new operational functionality that must function correctly during emergency grid conditions. Consequently, extensive development and testing are necessary to avoid reliability risks. Any incremental benefits associated with implementing Interim NITS do not justify accelerating implementation at the expense of reliability.
39. PJM agrees that large load growth presents emerging reliability challenges. However, implementation speed cannot come at the expense of operational accuracy and reliability. The Commission has consistently recognized that RTOs must ensure that major operational, market, and transmission administration changes are fully designed, tested, and validated before implementation. The complexity associated with customer-specific transmission service management warrants a deliberate implementation schedule that ensures reliable, transparent, and non-discriminatory administration.
40. Accordingly, the implementation timeline proposed by PJM reflects the substantial operational, software, market, and transmission service changes necessary to implement Interim NITS successfully and cannot reasonably be equated to the implementation requirements associated with IRAS.

VII. CONCLUSION

41. In my opinion, implementing Interim NITS safely and reliably requires coordinated changes across PJM operations, Transmission Owners, Generation Owners, customers, market systems, transmission-service systems, settlements, training, and compliance processes. The work must proceed from a stable service definition and must include integrated testing under normal, constrained, emergency, and degraded-tool conditions.
42. A Commission-authorized transition period of approximately 18 to 24 months would provide a reasonable implementation window under the assumptions stated above. That period is necessary to reduce the risk of inconsistent service treatment, non-executable market assumptions, unreliable curtailment, settlement errors, and inadequate operator or stakeholder readiness.
43. This concludes my Affidavit.

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

PJM Interconnection, L.L.C.	)	Docket Nos. EL25-49-000
	)	EL25-49-001
	)	EL25-49-002
	)	
	)	
PJM Interconnection, L.L.C.	)	Docket No. ER26-1479-000

VERIFICATION OF CHRISTOPHER PILONG

I, Christopher Pilon, pursuant to 28 U.S.C. § 1746, state, under penalty of perjury, that I am the Christopher Pilon referred to in the foregoing “Affidavit of Christopher Pilon on Behalf of PJM Interconnection, L.L.C.,” that I have read the same and am familiar with the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge, information, and belief.

/s/ Christopher Pilon
Christopher Pilon
Senior Director
Operations Planning
PJM Interconnection, L.L.C.

Executed on: October 14, 2026