UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation	)))	Docket No. RR27-1-000

COMMENTS OF PJM INTERCONNECTION, L.L.C.

Pursuant to the October 22, 2026 notice in this proceeding,[1] PJM Interconnection, L.L.C. ("PJM"), submits these comments ("Comment") to the October 21, 2026 petition of the North American Electric Reliability Corporation ("NERC") requesting approval of revisions to the NERC Rules of Procedure ("ROP") regarding computational load.

PJM is very supportive of the proposed ROP revisions related to the new registration system for computational load. PJM submits this limited Comment to urge the Commission to provide additional guidance on the development and use of the proposed registration system going forward and how it can best be harmonized with other registration and information gathering efforts to enhance reliability and avoid seams among the various registration and information-gathering efforts underway associated with computational load's impact on the bulk power system.

I. COMMENTS

PJM supports NERC's filed petition to establish a registration system for new computational loads. Indeed, PJM personnel served on the drafting team that developed the proposed standards that have been embodied in the various initial filings by NERC to address computational loads. PJM appreciates the work that NERC Staff and stakeholders

[1] *N. Am. Elec. Reliability Corp*., Combined Notice of Filings, Docket No. RR27-1-000, at 7 (Oct. 22, 2026) (establishing a comment date of November 20, 2026).

undertook, under considerable time pressure, to develop a first suite of computational load standards as well as revisions to the ROP to create a computational load registration requirement.

PJM files these comments to highlight issues that both the Commission and the NERC community should consider going forward in applying the proposed registration requirements. It would be helpful, in PJM's view, for the Commission to provide forward guidance on the issues outlined below so that a directional "road map" can be outlined to guide both the application of the proposed registration requirements and NERC's future computational load efforts.

Specific to the registration requirements, PJM urges the Commission to:

1. Encourage additional work on ensuring information sharing between NERC, the Regional Entities, and Transmission Providers so that the various registries being developed at NERC (for regulatory purposes) and at the RTOs and states (for planning and operational purposes) can complement each other. Through adequate information sharing, critical information needed for both long-term planning and near-term system operations can be made available to entities charged with these reliability responsibilities. Of course, information sharing needs to ensure that the confidentiality of certain of the information provided by large loads, computational loads, and load serving entities is maintained. Nevertheless, although the proposed NERC registry accomplishes a key step in identifying computational load users of the bulk power system and making them subject to NERC standards, in the long run reliability will be enhanced if there is adequate—albeit protected—information sharing so that those with a "need to know" to perform their reliability responsibilities can access a single robust source of computational load and large load information. Such a coordinated approach would also avoid new seams issues developing should there be a multitude of different types of registries in place across an Interconnection. In its Order accepting the proposed registration requirements, the Commission should encourage this more robust coordination and information sharing to be explored through the NERC process;

2. PJM recognizes that limitations on NERC requiring registration of computational loads using the bulk power system is limited to computational loads that have achieved commercial operation. However, from a planning viewpoint, it is critical that all entities charged with planning and forecasting be able to plan for *projected* verifiable data center load.

   The Commission has recognized this need through its Order 1920 call for long range planning and its more recent focus on ensuring accurate forecasting of large load. PJM believes that coordination and information sharing across the nation will be an important component of ensuring that the Commission's vision of long-term planning and accurate forecasting of large load can be best achieved. PJM recognizes that this is not a short-term issue but urges the Commission in its Order approving the proposed registration requirements to encourage coordination among NERC, its Regional Entities, and those charged with planning and operations reliability responsibilities to ensure that these goals can be achieved in as efficient a manner as possible.

PJM respectfully requests that the Commission provide direction on the above issues in its Order approving the proposed revisions to the ROP intended to create new computational load registration requirements.

II. CONCLUSION

PJM appreciates the opportunity to provide the Commission with its comments on NERC's proposed ROP revisions and respectfully requests that the Commission provide this additional guidance to NERC and the industry to help guide future efforts.

Respectfully submitted,

/s/ Arleigh P. Helfer

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CERTIFICATE OF SERVICE

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

Dated at Audubon, PA, this 20th day of November 2026.

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