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

Re: Order No. 202-25-6 Renewal Application Filing

Dear Secretary Wright:

Pursuant to Federal Power Act (“FPA”), Section 202(c)¹, part 205, subpart W, of the regulations of the Department of Energy (“DOE” or “Department”)² and Order No. 202-25-6 issued on July 28, 2025 by the Secretary of Energy (“Secretary”) (“July 28 Order”), PJM Interconnection, L.L.C. (“PJM”) respectfully submits a request for an 80-day renewal of the July 28 Order.³ PJM incorporates by reference PJM’s initial application submitted on July 21, 2025, and all attachments and appendices thereto (the “July 21 Application”).

I. BACKGROUND

Wagner Unit 4 is owned and operated by H.A. Wagner L.L.C. (“Wagner”), a wholly owned subsidiary of Talen Energy Corporation (“Talen”). Talen is an independent power producer. Wagner is an exempt wholesale generator (“EWG”) that owns and operates an approximately 841 MW (summer rating) generation facility in Anne Arundel County, Maryland, within PJM.

¹ 16 U.S.C. § 824a(c).

² 42 U.S.C. §§ 7101 and 7151(b).

³ The run time clock will restart for Wagner 4 on January 1, 2026. Therefore, emergency relief will not be needed for Wagner 4 once the clock restarts.

Relevant to this request, Wagner Unit 4 is an approximately 397 MW (summer rating) oil-fired generation unit commissioned in 1972.⁴

On October 16, 2023, Wagner notified PJM that it intended to retire Wagner Units 1, 3, 4, and CT 1, effective June 1, 2025. On January 4, 2024, PJM responded to Wagner's notice of proposed deactivation and stated that "the deactivation of the Wagner generating units 3 [oil-fired 305 MW capacity summer rating] and 4 [oil-fired 397 MW capacity summer rating] will adversely affect the reliability of the PJM Transmission System absent upgrades to the Transmission system."⁵

II. RENEWAL REQUEST

The July 28 Order states that a renewal request must be submitted in advance of the Order's expiration date of October 26, 2025, at 12:45 PM EDT. Accordingly, PJM respectfully submits this renewal request. PJM is authorized to state that Talen does not oppose this request and will operate Wagner Unit 4 in accordance with an emergency order issued by the Secretary and the Settlement Agreement approved by the Federal Energy Regulatory Commission ("FERC") in Docket No. ER24-1787 on May 1, 2025.⁶ Further, PJM has reviewed this request with the Maryland Department of the Environment ("MDE") which indicated, without opining on the reliability issues that give rise to this application, that it remains unable to provide the short term

⁴ Only Wagner Unit 4 is relevant to this emergency authorization request because of the operating limit ("Operating Limit") applied to Wagner Unit 4 under the terms of the MD SIP.

⁵ PJM's Response to Talen's Oct. 16, 2023 Letter (Jan. 4, 2024).

⁶ *H.A. Wagner LLC*, 191 FERC ¶ 61,098 (2025) ("Order on Contested Settlement").

relief sought by this application as any modifications would require amendment to the existing Maryland State Implementation Plan (“MD SIP”).⁷

PJM seeks authorization to direct Wagner Unit 4 to operate consistent with PJM’s Governing Agreements, Good Utility Practice, the Settlement Agreement accepted by FERC in Docket No. ER24-1787, and beyond its Operating Limit in compliance with the dispatch methodology set forth herein and only in those instances where PJM has:

- Declared or anticipates declaring based on system conditions a Maximum Generation Emergency Alert⁸;
- Declared or anticipates declaring based on system conditions a Transmission Security Emergency⁹ impacting the reliability of transmission facilities required to serve the load in the BG&E Zone, or to prevent potential load shed due to transmission limitations; or
- To the extent not otherwise covered by the above, scheduled and dispatched Wagner Unit 4 in a manner consistent with the Settlement Agreement accepted by FERC in Docket No. ER24-1787. Specifically, Section 3.3(a) of the Settlement Agreement provides that “PJM may schedule and dispatch [Wagner Unit 4] solely to address (i) an identified transmission reliability need in support of the requirement to operate such transmission facilities within established thermal, voltage and stability limits under Sections 2 and 3 of PJM Manual 3 and when such transmission reliability needs cannot otherwise be met with available economically dispatched generating resources; (ii) a PJM transmission reliability need caused by a system restoration need as described in PJM Manual 36; (iii) a capacity emergency (as described in PJM Manual 13) during which PJM determines that the resources scheduled for an operating day are not sufficient to maintain the appropriate reserve levels for PJM and (iv) any required testing[.]”

⁷ PJM is undertaking modeling work to develop a proposed MD SIP amendment that may obviate the need for future Emergency Section 202(c) Orders relating to Wagner Unit 4.

⁸ PJM, Manual 13: Emergency Operations, § 2 (rev. 92, Dec. 20, 2023), <https://www.pjm.com/-/media/documents/manuals/m13.ashx>.

⁹ *Id.* at § 5.

PJM remains committed to taking actions to minimize the need to call upon Wagner Unit 4 to operate beyond its Operating Limit. However, this request is necessary given the continued nature of the emergency, particularly as PJM prepares for the 2025-2026 winter season and anticipates cold-weather needs and contingencies. As of the date of this filing, PJM estimates that there are only 80 hours of run time remaining (which is only 3 starts remaining for Wagner Unit 4 in 2025, if it is dispatched for its minimum run time each time)¹⁰ before Wagner Unit 4 would operate beyond its Operating Limit for the rest of the year 2025. It is reasonable to expect that Wagner Unit 4 could exceed its Operating Limit during periods when PJM would need to dispatch the unit. Allowing history to guide our anticipated cold-weather needs, last winter there were 11 instances within a single month where Wagner Unit 4 ran to support record high loads.¹¹ If, as in prior years, the last months of 2025 are particularly cold and experience severe winter weather, it is likely PJM would need to rely on Wagner Unit 4. PJM's anticipated winter readiness, needs and overall assessment will be addressed in greater detail during PJM's November Operating Committee meeting, and PJM can supplement the record with additional information presented at that meeting (and any other relevant winter-readiness assessments) once posted.¹²

PJM respectfully requests that the Secretary grant this renewal application and order the continued operation of Wagner Unit 4 to alleviate the emergency as more fully described in the July 21 Application and herein under Section 202(c) of the FPA. PJM requests the renewal order provide as follows:

¹⁰ PJM estimates that 3 starts are remaining given the unit's emissions during the start-up and shutdown processes, which are not fully accounted for in the minimum run time.

¹¹ July 21 Application at 8.

¹² Once posted, related meeting materials will be available at: <https://www.pjm.com/committees-and-groups/committees/oc>

- (i) An emergency continues to exist in the BG&E territory due to a shortage of electric energy and a shortage of facilities for the generation and transmission of electric energy and that issuance of a renewal Order will meet the emergency needs and serve the public interest.
- (ii) From October 26, 2025, to December 31, 2025, Talen shall operate Wagner Unit 4 as directed by PJM as needed to maintain grid reliability or for other local area transmission issues.
- (iii) PJM shall comply, to the maximum extent practicable, with applicable laws and regulations including the applicable orders for Wagner Unit 4.
- (iv) If Wagner Unit 4 is dispatched and operated in reliance on this Order, PJM shall notify the Department of Energy on the business day following the dispatch and operation and provide information on levels of exceedance of the annual Operating Limit.
- (v) PJM shall also provide such additional information regarding the environmental impacts of this Order and its compliance with the conditions of this Order, as requested by the Department of Energy from time to time.

PJM respectfully submits that the above information satisfies the requirements of FPA Section 202(c)(1), (2), (3) and (4) and the procedures of the Department of Energy's regulations, 16 C.F.R. §205.373 ("Applicable Procedures"). Attached hereto as an Appendix is additional information that may be required by the Application Procedures for this emergency relief renewal application.

III. CONCLUSION

PJM appreciates the Department's expedited consideration of this renewal request.

Respectfully submitted,

/s/ Michael E. Bryson
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FOR PUBLIC POSTING

APPENDIX

16 C.F.R. §§ 205.373 Application Procedures

(a) *The exact legal name of the applicant and of all other “entities” named in the application.*

See application.

(b) *The name, title, post office address, and telephone number of the person to whom correspondence in regard to the application shall be addressed.*

See application.

(c) The political subdivision in which each “entity” named in the application operates, together with a brief description of the area served and the business conducted in each location.

See application.

(d) Each application for a section 202(c) order shall include the following baseline data:

(1) Daily BGE Zone peak load and energy requirements for each of the past 30 days and projections for each day of the expected duration of the emergency;

[illegible]

(2) All capacity and energy receipts or deliveries to other electric utilities for each of the past 30 days, indicating the classification for each transaction;

Not Applicable because Wagner Unit 4 is a network resource deliverable to the entire PJM Region.

(3) The status of all interruptible customers for each of the past 30 days and the anticipated status of these customers for each day of the expected duration of the emergency, assuming both the granting and the denial of the relief requested herein;

Currently, approximately 166MW of PJM Demand Response is available in the BG&E Zone.

(4) All scheduled capacity and energy receipts or deliveries to other electric utilities for each day of the expected duration of the emergency.

Not Applicable. PJM is a single Balancing Authority, and as such performs a single Security Constrained Economic Dispatch to economically dispatch generation to service to load in the BG&E Zone.

(e) A description of the situation and a discussion of why this is an emergency, including any necessary background information. This should include any contingency plan of the applicant and the current level of implementation.

See application.

(f) A showing that adequate electric service to firm customers cannot be maintained without additional power transfers.

The table below shows the most common transmission constraints encountered during real-time operations. The positive impact of Wagner Unit 4 on the constraint is indicated as a percentage in the 'Distribution Factor' column. Based on the unit's maximum output of 397 MW, the 'Impact to load' column indicated the amount of BG&E load that would be at risk if PJM is exceeding limits on the particular constraint and Wagner Unit 4 is offline. Impact to load at full output is determined by multiplying Wagner Unit 4's maximum output of 397 MW by the Wagner Unit 4 Distribution Factor for each constraint. The resultant Impact to Load is the amount of load that could be shed if Wagner Unit 4 is not scheduled.

[REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

*Values based on IROL Load Dump Tables located in PJM Manual 13 Attachment N

(g) A description of any conservation or load reduction actions that have been implemented. A discussion of the achieved or expected results or these actions should be included.

See response to item d(3) above.

(h) A description of efforts made to obtain additional power through voluntary means and the results of such efforts; and a showing that the potential sources of power and/or transmission services designated pursuant to paragraphs (i) through (k) of this section informed that the applicant believed that an emergency existed within the meaning of § 205.371.

PJM will serve the BG&E zone with resources throughout the regional transmission organization (“RTO”) consistent with PJM’s single dispatch but the Zone will be limited by transmission constraints (see response to (f) above).

(i) A listing of proposed sources and amounts of power necessary from each source to alleviate the emergency and a listing of any other “entities” that may be directly affected by the requested order.

There are no other impacted entities.

(j) Specific proposals to compensate the supplying “entities” for the emergency services requested and to compensate any transmitting “entities” for services necessary to deliver such power.

Wagner Unit 4 as with other generation, Demand Response, and transmission will be compensated when dispatched in accordance with the rates set forth in the Settlement Agreement accepted by the Federal Energy Regulatory Commission in Docket No. ER24-1787.

(k) A showing that, to the best of the applicant's knowledge, the requested relief will not unreasonably impair the reliability of any “entity” directly affected by the requested order to render adequate service to its customers.

No entity will be adversely impacted.

(l) Description of the facilities to be used to transfer the requested emergency service to the applicant's system.

[REDACTED]

(1) If a temporary interconnection under the provisions of section 202(c) is proposed independently, the following additional information shall be supplied for each such interconnection:

Not Applicable

(i) Proposed location;

(ii) Required thermal capacity or power transfer capability of the interconnection;

(iii) Type of emergency services requested, including anticipated duration;

(iv) An electrical one line diagram;

(v) A description of all necessary materials and equipment; and

(vi) The projected length of time necessary to complete the interconnection.

(2) If the requested emergency assistance is to be supplied over existing facilities, the following information shall be supplied for each existing interconnection:

Interconnection Service Agreement among PJM Interconnection, L.L.C., and H.A. Wagner LLC, and Baltimore Gas and Electric Company (Service Agreement No. 3467), FERC Docket No. ER18-2134-000.

(i) Location;

(ii) Thermal capacity of power transfer capability of interconnection facilities; and

(iii) Type and duration of emergency services requested.

See application.

(m) A general or key map on a scale not greater than 100 kilometers to the centimeter showing, in separate colors, the territory serviced by each “entity” named in the application; the location of the facilities to be used for the generation and transmission of the requested emergency service; and all connection points between systems.

See PJM, Transmission Zones Served (July 18, 2025), <https://www.pjm.com/-/media/DotCom/about-pjm/pjm-zones.pdf>. See also Interconnection Service Agreement among PJM Interconnection, L.L.C., and H.A. Wagner LLC, and Baltimore Gas and Electric Company (Service Agreement No. 3467), FERC Docket No. ER18-2134-000.

(n) An estimate of the construction costs of any proposed temporary facilities and a statement estimating the expected operation and maintenance costs on an annualized basis. (Not required on section 202(d) applications.)

See the above-referenced FERC-accepted Settlement Agreement filed in Docket No. ER24-1787.