UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C., et al.	Docket Nos.	EL25-49-002 EL25-49-000
Large Loads Co-Located at Generating Facilities		AD24-11-001
Constellation Energy Generation, LLC v. PJM Interconnection, L.L.C.		EL25-20-001 (consolidated)
PJM Interconnection, L.L.C.		ER26-1479-000

MOTION FOR EXTENSION OF TIME FOR SPECIFIED COMPLIANCE REQUIREMENTS AND REQUEST FOR EXPEDITED TREATMENT OF PJM INTERCONNECTION, L.L.C.

Pursuant to Rule 212 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure,[1] PJM Interconnection, L.L.C. ("PJM") moves for an extension of time to comply with certain requirements in the Order on Rehearing, Clarification, Compliance Filing, and Paper Hearing issued June 18, 2026 ("Compliance Order").[2] Specifically, PJM requests that the Commission grant a ninety-day extension for certain compliance requirements (noted below) that implicate directives in the show cause order on large loads issued the same day ("Large Load Order").[3] If the requested relief is granted, PJM will still make a compliance filing on August 17, 2026,

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[1] 18 C.F.R. § 385.212.

[2] *PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,209 (2026).

[3] *See PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,211 (2026).

addressing several important compliance directives, including relating to Interim Network Integration Transmission Service ("NITS"). However, many of the changes to PJM's Open Access Transmission Tariff ("Tariff") required by the Compliance Order will serve as the foundation for the Large Load Order's reforms. To ensure that certain compliance changes in this proceeding align with the directives in the Large Load Order in a holistic fashion, PJM must consider these related requirements together. This requires additional time. PJM has developed a plan to finalize the foundational portions of the compliance filing in this proceeding in conjunction with the development of a Federal Power Act ("FPA") section 205[4] filing to respond to the Large Load Order. To allow time for stakeholder engagement and feedback on the changes, PJM plans to make the resulting filings by early to mid-November.

Absent further Commission action, the entirety of PJM's compliance filing is due August 17, 2026. Accordingly, PJM is moving to hold the Large Load proceeding in abeyance for ninety days[5] and seeking a ninety-day extension of certain directives in the Compliance Order, while pledging to submit a partial compliance filing on August 17, 2026 to reflect PJM's continuous and ongoing efforts to implement the Commission's reforms. PJM requests the Commission grant expedited treatment to act on this motion within ten days, by **August 6, 2026**, in the interest of regulatory certainty.

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[4] 16 U.S.C. § 824d.

[5] *PJM Interconnection, L.L.C.*, Motion of PJM Interconnection, L.L.C. to Hold Proceeding in Abeyance and Request for Shortened Answer Period and Expedited Treatment, Docket No. EL26-67-000 (July 28, 2026).

I. BACKGROUND

A. Co-Located Load Proceeding

The Commission initiated this proceeding on December 18, 2025.[6] Following multiple compliance filings and paper hearing submissions, the Commission issued the Compliance Order on June 18, 2026 accepting most of PJM's proposed Tariff changes, but directing PJM to make a number of additional Tariff changes within sixty days.[7] Among other changes, the Compliance Order directed PJM to clarify the study process for interconnecting Co-Located Loads,[8] make new transmission services available to customers with behind the meter generation ("BTMG") that are willing and able to limit their withdrawals from the transmission system,[9] and clarify the operational requirements for customers taking service on behalf of large loads.[10]

B. Large Load Proceeding

Also on June 18, 2026, the Commission initiated a new show cause proceeding via the Large Load Order.[11] The Large Load Order found that several aspects of PJM's Tariff appeared unjust and unreasonable due to the lack of specific procedures for integrating large loads, including a lack of procedures for interconnection studies, processing transmission service requests, and constructing network upgrades without cost shifting.[12] The Large Load Order also found PJM's Tariff appeared to be unjust and unreasonable due

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[6] *PJM Interconnection, L.L.C.*, 193 FERC ¶ 61,217 (2025).

[7] *See, e.g.*, Compliance Order at P 280 (directing PJM to revise Tariff to specify what information about necessary studies will be available in the manuals).

[8] *Id.* at PP 370-74.

[9] *Id.* at P 91.

[10] *See id.* at P 65.

[11] *Id*. at P 1.

[12] Large Load Order at PP 60, 65, 77.

to a lack of transmission service options for customers serving large loads that are willing and able to limit their withdrawals from the transmission system.[13] Additionally, the Large Load Order found that PJM's Tariff appeared to be unjust and unreasonable due to a lack of mechanisms to ensure that costs are not shifted between transmission customers.[14]

To address these issues, the Large Load Order directed PJM to make two compliance filings.[15] First, the Large Load Order directed PJM to submit an informational filing within thirty days to explain how PJM intends to ensure that it has adequate generation to serve existing and new large loads.[16] Second, the Large Load Order directed PJM to submit within sixty days a compliance filing to explain whether its Tariff remains just and reasonable in light of the issues identified in the order or to propose Tariff changes that would remedy the identified concerns.[17] The Commission noted that it would entertain requests to hold the show cause proceedings in abeyance if PJM demonstrated a plan to propose changes pursuant to FPA section 205.[18]

C. Overlap Between Proceedings

The compliance changes directed in this proceeding significantly relate to or overlap with the directives in the Large Load Order in three major areas: expansion of new transmission services, study procedures, and operational requirements.

First, the Compliance Order and the Large Load Order both directed PJM to expand the availability of new transmission services. The Compliance Order directed PJM to make

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[13] *Id.* at P 86.

[14] *Id.* at P 77.

[15] *Id.* at ordering paras. (A) & (B).

[16] *Id.* at P 4.

[17] *Id.* at ordering para (B).

[18] *Id.* at P 39.

the new transmission services available to customers taking service on behalf of load with BTMG that are willing and able to limit their withdrawals from the transmission system.[19] To accomplish this, the Commission directed PJM to either add a definition of "Eligible Load" that encompasses both customers serving both Co-Located Load and load with BTMG or to propose comparable Tariff revisions.[20] At the same time, the Large Load Order directed PJM to propose Tariff changes to make those same new transmission services available to flexible large loads or explain why it need not do so.[21] Thus, PJM will consider the potential impacts on flexible large loads in crafting Tariff revisions to expand the new transmission services to customers serving load with BTMG.

Second, the Compliance Order and the Large Load Order both directed PJM to enhance its study procedures. The Compliance Order directed PJM to revise the Tariff to adopt more detailed study procedures for firm contract demand transmission service and non-firm contract demand transmission service that mirror existing cluster study procedures.[22] Similarly, in the Large Load Order, the Commission directed PJM to either propose study procedures for customers requesting service on behalf of large loads that can identify necessary network upgrades within 60-90 days or explain why it need not do so.[23] Thus, PJM will determine how to integrate these large loads into its study processes.

Third, the Compliance Order directed PJM to revise the Tariff to provide additional detail regarding the operational requirements and necessary control technologies to be

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[19] Compliance Order at P 91 (directing PJM to expand new transmission services to customers serving those with BTMG that are willing and able to limit withdrawals from the transmission system).

[20] Compliance Order at P 91.

[21] Large Load Order at P 87.

[22] Compliance Order at P 370.

[23] Large Load Order at P 63.

employed for customers taking new transmission services on behalf of Eligible Load.[24] Similarly, the Large Load Order directed PJM to evaluate what operational requirements are appropriate for customers taking service on behalf of large loads.[25] Thus, PJM must either set operational requirements that encompass the various categories of co-located and large loads or determine what operational requirements are appropriate for large loads specifically to ensure treatment that is not unduly discriminatory.

D. Compliance Plan

PJM will submit a partial compliance filing on August 17, 2026 in this docket to reflect its ongoing efforts to implement these important reforms. Nevertheless, PJM plans to address the related portions of the Compliance Order's directives and the response to the Large Load Order in a coordinated suite of filings (i.e., a compliance filing for the Compliance Order and an FPA section 205 filing to address the Large Load Order reforms). Because a number of the changes in this proceeding will either overlap with or serve as the foundation for the Large Load FPA section 205 changes, PJM intends to develop the changes together to ensure a consistent, unified approach.

PJM has or will be scheduling stakeholder engagement sessions to both share and receive feedback on PJM's proposal (including aspects of the co-located load compliance filing) on July 30, 2026, August 18, 2026, and September 16, 2026.[26] PJM proposes to submit its remaining compliance filing in this docket at the same time as the FPA section 205 filing responding to the Large Load Order to present a holistic and unified solution to the various reforms.

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[24] Compliance Order at PP 482, 541.

[25] Large Load Order at P 64.

[26] If additional sessions are necessary, PJM would schedule them.

II. MOTION FOR EXTENSION OF TIME

The Commission may extend compliance deadlines for good cause.[27] Here, good cause exists to grant a ninety-day extension of the compliance requirements specified herein to allow PJM to develop the remaining aspects of its Co-Located Load compliance filing in conjunction with the FPA section 205 filing being developed in response to the Large Load Order.

PJM has worked to address the Compliance Order's directives with all due speed and will be in a position to comply with many of them within sixty days. For example, PJM will file Tariff changes addressing many important issues in the Compliance Order to provide immediate certainty to developers and commence physical interconnection-related studies of proposed Co-Located Load configurations. In particular, by August 17, 2026, PJM will submit a compliance filing that addresses Commission-directed changes to: certain defined terms in Tariff, Part I; certain terms for NITS pursuant to Tariff, Part III; additional details regarding the Necessary Study process that will be specified in the manuals; and the provision of interim NITS.[28]

Given the interrelated nature of a number of the other requirements in the Compliance Order and Large Load Order, a coordinated approach on the remaining compliance matters is appropriate for consistency and efficiency. As noted above, both orders require PJM to propose Tariff changes to address the study procedures to interconnect Co-Located/Large Loads, make new transmission services available for customers that are willing and able to limit their withdrawals, and specify operational

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[27] *See* 18 C.F.R. § 385.2008.

[28] *See, e.g.*, Compliance Order at PP 91, 102-103, 264, 307.

requirements for Co-Located/Large Loads.[29] PJM proposes to address these interrelated requirements in a suite of filings to be submitted by early to mid-November following a period of intensive stakeholder engagement and feedback. To allow time for that process, PJM moved to hold the proceedings on the Large Load Order in abeyance for a period of ninety days.[30] To allow for a coordinated approach, PJM is requesting the same ninety-day extension of the related requirements here for good cause shown (including PJM's pledge to submit a partial compliance filing by August 17, 2026, as noted above).

III. REQUEST FOR EXPEDITED TREATMENT

PJM respectfully requests that the Commission consider this motion on an expedited basis to act on this request within ten days of filing, by August 6, 2026. Absent Commission action, PJM's filings for both the Compliance Order and the Large Load Order are due August 17, 2026. PJM has already moved for the Commission to hold the Large Load Order proceeding in abeyance for ninety days and to act on that request by August 6, 2026. Given the impending deadline and PJM's plans for combined stakeholder engagement, PJM requests that the Commission rule on this motion within ten days, by August 6, 2026, in the interest of regulatory certainty.

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[29] Compliance Order at PP 370-74 (directing additional Tariff changes regarding the study procedures for Co-Located Loads); Large Load Order at P 86 (directing Tariff changes to make transmission services available to those willing and able to limit withdrawals from the transmission system); Compliance Order at P 91 (directing PJM to expand new transmission services to customers serving those with BTMG that are willing and able to limit withdrawals from the transmission system).

[30] *PJM Interconnection, L.L.C.*, Motion of PJM Interconnection, L.L.C. to Hold Proceeding in Abeyance and Request for Shortened Answer Period and Expedited Treatment, Docket No. EL26-67-000 (July 28, 2026).

IV. CONCLUSION

For the reasons stated above, PJM requests the Commission (i) grant a ninety-day extension of time for the specified compliance obligations in the Compliance Order and (ii) expeditiously act on this motion within ten days, by August 6, 2026.

Respectfully submitted,

<u>/s/ Ruth M. Porter</u>

Wendy B. Warren
Ruth M. Porter
WRIGHT & TALISMAN, P.C.
1200 G Street, NW, Suite 600
Washington, DC 20005
(202) 393-1200
warren@wrightlaw.com
porter@wrightlaw.com

Counsel for
PJM Interconnection, L.L.C.

Craig Glazer
Vice President – Federal Government Policy
PJM Interconnection, L.L.C.
1200 G Street, NW, Suite 600
Washington, DC 20005
(202) 423-4743
craig.glazer@pjm.com

Mark J. Stanisz
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
(610) 666-8800
mark.stanisz@pjm.com

July 28, 2026

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 Washington, DC, this 28th day of July 2026.

/s/ Ruth M. Porter
Ruth M. Porter
WRIGHT & TALISMAN, P.C.
1200 G Street NW, Suite 600
Washington, DC 20005-3898
(202) 393-1200
porter@wrightlaw.com

Attorney for PJM Interconnection, L.L.C.