UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C., et al.	)	Docket No. EL26-67-000

MOTION OF PJM INTERCONNECTION, L.L.C. TO HOLD PROCEEDING IN ABEYANCE AND REQUEST FOR SHORTENED ANSWER PERIOD AND EXPEDITED TREATMENT

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"),[1] PJM Interconnection, L.L.C. ("PJM") moves to hold the above-captioned proceeding in abeyance for ninety days to allow PJM to pursue a Federal Power Act ("FPA") section 205 filing,[2] to address the issues identified in the large load show cause order issued June 18, 2026 ("Large Load Order").[3] PJM is already working to develop a section 205 filing to respond to the Large Load Order on an expedited basis. This development, however, must be done in conjunction with PJM's already ongoing efforts to implement changes directed by the Order on Rehearing, Clarification, Compliance Filing, and Paper Hearing ("Compliance Order") in the PJM Co-Located Load proceeding.[4] Many of the changes contemplated in the Large Load Order will build upon compliance changes recently ordered for Co-Located Load in Docket Nos. EL25-49-000, et al.[5] Given the complexity and interrelated nature of these issues, an abeyance is appropriate to allow time for PJM to identify what changes to the Open Access Transmission Tariff ("Tariff") may be needed on a holistic basis, engage with stakeholders,

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[1] 18 C.F.R. § 385.212.

[2] 16 U.S.C. § 824d.

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

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

[5] *See id*.

and develop the resulting FPA section 205 filing. PJM anticipates submitting that filing by early to mid-November. Accordingly, PJM respectfully requests that the Commission grant a ninety-day abeyance starting on the current compliance deadline, August 17, 2026.[6] In the interest of regulatory certainty, PJM also requests that the Commission shorten the answer period to five days and grant expedited consideration to rule on this motion within ten days of filing (i.e., by August 6, 2026).

I. BACKGROUND

A. Large Load Order

The Large Load Order is an important component of the Commission's ongoing efforts to efficiently and cost effectively integrate large loads with the transmission system.[7] 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 large load-specific procedures for interconnection studies, processing transmission service requests, and providing transmission service without cost shifting.[8] The Large Load Order also found PJM's Tariff appeared to be unjust and unreasonable due to a lack of transmission service options for customers taking service on behalf of large loads that are willing and able to limit their withdrawals from the transmission system.[9] 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.[10]

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[6] *See* Large Load Order at P 3.

[7] *Id*. at P 1.

[8] *Id.* at PP 60, 65, 77.

[9] *Id.* at P 86.

[10] *Id.* at P 77.

To address these issues, the Large Load Order directed PJM to make two compliance filings.[11] 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.[12] Second, the Large Load Order directed PJM to submit within sixty days a response to explain whether its Tariff remains just and reasonable in light of the issues identified in the order or to propose changes that would remedy the identified concerns.[13] 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 section 205 of the FPA.[14]

B. Co-Located Load Proceeding

Also on June 18, 2026, the Commission issued the Compliance Order in the PJM Co-Located Load proceeding.[15] The Compliance Order accepted most of PJM's proposed Tariff changes, but directed that PJM make a number of additional changes within sixty days.[16] Among other things, the Compliance Order directed PJM to propose changes to clarify the study process for interconnecting Co-Located Loads,[17] make new transmission services available to customers with behind the meter generation ("BTMG") that are

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

[12] *Id.* at P 4 & ordering para. (C).

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

[14] *Id.* at P 39.

[15] *See generally* Compliance Order.

[16] *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).

[17] *Id.* at PP 370-75.

willing and able to limit their withdrawals from the transmission system,[18] and clarify the operational requirements for customers taking service on behalf of large loads.[19]

C. Overlap Between Proceedings

The compliance changes directed in the Large Load Order significantly relate to or overlap with the directives in the Compliance Order in three major areas: (1) expansion of new transmission services; (2) study procedures; and (3) 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 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.[20] 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.[21] 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.[22] 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

[18] *Id.* at P 91.

[19] *Id.* at P 65.

[20] *Id.* 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).

[21] *Id.*

[22] Large Load Order at P 87.

adopt more detailed study procedures for firm contract demand transmission service and non-firm contract demand transmission service that mirror existing cluster study procedures.[23] 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.[24] 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 employed for customers taking new transmission services on behalf of Eligible Load.[25] Similarly, the Large Load Order directed PJM to evaluate what operational requirements are appropriate for customers taking service on behalf of large loads.[26] 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

Given the significant overlap in subject matter,[27] it is important for PJM to consider a number of the related Compliance Order's directives in responding to the Large Load Order. PJM has already been working to develop the Tariff changes directed by the Compliance Order that will serve, in large part, as the foundation for the FPA section 205

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[23] Compliance Order at P 370.

[24] Large Load Order at P 63.

[25] Compliance Order at PP 482, 541.

[26] Large Load Order at P 64.

[27] *See, e.g.*, *Midcontinent Indep. Sys. Operator*, 195 FERC ¶ 61,212 (2026) (issuing show cause order regarding co-located load arrangements and large load); *Sw. Power Pool, Inc.*, 195 FERC ¶ 61,213 (2026) (same); *Cal. Indep. Sys. Operator Corp.*, 195 FERC ¶ 61,214 (2026) (same).

filing PJM intends to develop to respond to the Large Load Order. PJM intends to make a compliance filing on August 17th to address many of the Compliance Order's directives as further discussed in PJM's simultaneously-filed extension motion in that proceeding. Given the interrelated nature of many of these requirements, PJM is proposing to address the related remaining aspects of both filings through integrated stakeholder engagement.

PJM is immediately focusing on the remaining open issues presented by the Compliance Order to finalize its tariffed construct for accommodating co-location arrangements and load with BTMG, which is the bedrock for many of the other Large Load Order reforms. To avoid any doubt, PJM's August 17th compliance filing in the Co-Located Load docket will, for example, make progress on the new transmission service products by including Tariff language on Interim Network Integration Transmission Service. At the same time, PJM intends its FPA section 205 filing in the Large Load Order docket will address all other categories for reform identified in the Large Load Order. Among other things, PJM's intended FPA section 205 filing will advance a proposal that delivers faster and more flexible processes that also: (1) achieve efficient transmission service application and study processes, including through the consideration of alternative transmission technologies; (2) prevent cost shifting and enhance transparency into transmission costs[28] (with consideration given to concerns and issues raised in recently submitted requests for clarification and rehearing); (3) provide new transmission services for flexible large loads, building upon the work that has already been done and will be finalized regarding Co-Located Load; and (4) enhance study processes especially for generating facilities that serve electrically proximate large loads. More details about PJM's

[28] PJM is working on these cost and rate issues with the PJM Transmission Owners, consistent with their FPA section 205 filing rights.

conceptual framework will be previewed with stakeholders on July 30, 2026. A presentation reflecting this framework has been publicly posted to guide the next few months of intensive, focused engagement efforts to realize these important reforms.[29]

PJM has or will be scheduling stakeholder engagement sessions to both share and receive feedback on PJM's proposal on July 30, 2026, August 18, 2026, and September 16, 2026,[30] with the goal of taking an advisory stakeholder vote on the proposal at the meeting of the Members Committee on October 28, 2026, while also satisfying the notice requirements pursuant to Tariff, section 9.2(b).[31] PJM will also engage with the Transmission Owners through appropriate consultation on or about the same date. Because section 9.2(b) of the Tariff requires this consultation to take place at least seven days prior to an FPA section 205 filing,[32] PJM would then be in a position to make the resulting section 205 filing in early to mid-November. PJM is separately moving for a ninety-day extension of time for some aspects of the compliance obligations in the Compliance Order, even though PJM will make a compliance filing in that proceeding on August 17, 2026, as further discussed in its extension motion.[33]

II. MOTION TO HOLD PROCEEDING IN ABEYANCE

PJM respectfully requests the Commission hold this proceeding in abeyance for ninety days to allow PJM adequate time to develop a section 205 filing to respond to the

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[29] Donnie Bielak, *Show Cause Order for Large Loads Conceptual Approach: Co-Located Load Order Workshop*, PJM Interconnection, L.L.C. Interconnection Planning (July 30, 2026), https://www.pjm.com/-/media/DotCom/committees-groups/workshops/cllsco/2026/20260730/20260730-item-03---show-cause-for-large-loads-conceptual-approach---presentation.pdf/ [https://perma.cc/QSQ5-FKAU].

[30] These are the currently contemplated dates, but the dates may be subject to change as needed.

[31] Tariff, Part I, section 9.2(b).

[32] *See id.*

[33] *PJM Interconnection, L.L.C.*, Motion for Extension of Time for Specified Compliance Requirements and Request for Expedited Treatment of PJM Interconnection, L.L.C., Docket Nos. EL25-49-000, et al. (July 28, 2026).

Large Load Order. An abeyance is appropriate to allow PJM to identify and develop the necessary Tariff changes, engage with stakeholders on an expedited basis, and develop an FPA section 205 filing to address the Large Load Order while also finalizing its response to certain overlapping aspects of the Compliance Order. The Commission has previously exercised its discretion to hold show cause proceedings in abeyance to allow a Regional Transmission Organization to engage with stakeholders to resolve the matter via an FPA section 205 filing.[34] It should do so again here.

As discussed above, there is significant overlap in the compliance directives in the Large Load Order and the Compliance Order. Given this overlap, PJM intends to address the related requirements of both orders with stakeholders through integrated stakeholder engagement to promote efficiency and consistency. As noted above, PJM has scheduled or will be scheduling stakeholder meetings, presentations, and opportunities for engagement and feedback with the goal of making its remaining Co-Located Load compliance filing and one or more FPA section 205 filings to address the requirements in the orders by mid-November.

III. REQUEST FOR SHORTENED ANSWER PERIOD AND EXPEDITED TREATMENT

PJM respectfully requests that the Commission shorten the answer period for this motion to five days and grant expedited treatment to issue an order ruling on the abeyance motion within ten days, by August 6, 2026. Although Rule 213(d)(1) generally allows

[34] *See, e.g.*, *Sw. Power Pool, Inc.*, Notice Granting Motion to Hold Proceeding in Abeyance, Docket No. EL22-65-000 (Jan. 31, 2024) (holding show cause proceedings in abeyance pending stakeholder process to resolve show cause proceedings via a section 205 filing); *see also PJM Interconnection, L.L.C.*, 171 FERC ¶ 61,015, at P 34 (2020) (holding a paper hearing proceeding in abeyance to allow stakeholder discussions to continue); *Midcontinent Indep. Sys. Operator, Inc.*, 161 FERC ¶ 61,057, at P 44 (2017) (same); *Sw. Power Pool, Inc.*, 161 FERC ¶ 61,062, at P 33 (2017) (same).

fifteen days to answer a motion,[35] the Commission may shorten the answer period or eliminate it all together for good cause shown.[36] Good cause exists to shorten the answer period and grant expedited treatment given the Large Load Order's fast approaching compliance deadline.

First, shortening the answer period will promote regulatory certainty. The Large Load Order directed PJM to respond to the range of issues identified within sixty days.[37] Absent further Commission action, PJM's response to the Large Load Order is due August 17, 2026, which is less than twenty-one days from the date of this motion's filing. If the Commission allows for a full fifteen-day answer period, PJM will not have clarity on whether the deadline applies until shortly before the due date, and PJM will need to devote resources towards preparing the responsive filing and not to the FPA section 205 filing. Moreover, there is heightened uncertainty surrounding an abeyance request in this case given that the Commission emphasized that it will not grant such requests reflexively.[38] Thus, a shortened answer period and expedited treatment is appropriate to give PJM certainty in advance of the deadline.

Second, any interested person or entity should be in a position to respond to this motion quickly because the Commission specifically contemplated the potential for such requests in the Large Load Order.[39] Indeed, the Commission directed that any such requests be made within forty-five days of the issuance of the order to give the Commission

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[35] 18 C.F.R. § 385.213(d)(1).

[36] *See id.*

[37] *See supra* note 12.

[38] Large Load Order at P 39.

[39] *Id.*

adequate time to act on the request.[40] Given this timing directive (i.e., that abeyance requests could be made up to fifteen days before the deadline), anyone with an interest in this proceeding should have been on notice regarding the need to respond on an expedited basis.

Finally, as noted above, PJM is also seeking a coincident ninety-day extension of certain overlapping compliance obligations from the Compliance Order.[41] Because the answer to that motion and the request to shorten the answer period here will both be due within five days unless the Commission otherwise orders,[42] granting this request for a shortened answer period will promote administrative efficiency by allowing the Commission to rule on these related requests at the same time.

IV. CONCLUSION

For the reasons set forth above, PJM respectfully requests that the Commission (i) grant this motion to hold this proceeding in abeyance for a period of ninety days starting August 17, 2026, to allow PJM time to develop, with stakeholder engagement, and submit an FPA section 205 filing to address the issues identified in the Large Load Order; (ii) shorten the answer period to five days; and (iii) grant expedited consideration to issue an order on this motion within ten days by August 6, 2026.

[40] *Id.*

[41] *See supra* note 333.

[42] 18 C.F.R. § 385.213(d)(1)(i).

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
(202) 393-1240
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
(202) 393-7741
craig.glazer@pjm.com

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

Dated: 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, D.C., this 28th day of July 2026.

/s/ Ruth M. Porter
Ruth M. Porter
1200 G Street, NW, Suite 600
Washington, DC 20005
(202) 393-1200

Attorney for PJM Interconnection, L.L.C.