

195 FERC ¶ 61,090  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Laura V. Swett, Chairman;  
David Rosner, Lindsay S. See,  
Judy W. Chang, and David LaCerte.

PJM Interconnection, L.L.C.

Docket Nos. ER26-846-000  
ER26-846-001

ORDER ACCEPTING TARIFF REVISIONS

(Issued May 5, 2026)

1. On December 19, 2025, as amended on March 6, 2026, pursuant to section 205 of the Federal Power Act (FPA)<sup>1</sup> and part 35 of the Commission's regulations,<sup>2</sup> PJM Interconnection, L.L.C. (PJM) filed revisions to its Open Access Transmission Tariff (Tariff) and the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. (Operating Agreement) to effectuate the participation of a new category of market participant, known as Economic Load Response Regulation Only Participant, in PJM's Regulation market.<sup>3</sup> In this order, we accept PJM's proposed revisions, effective April 1, 2026,<sup>4</sup> as requested.<sup>5</sup>

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<sup>1</sup> 16 U.S.C. § 824d.

<sup>2</sup> 18 C.F.R. pt. 35 (2025).

<sup>3</sup> Capitalized terms that are not defined in this order have the meaning specified in the Tariff.

<sup>4</sup> PJM filed PJM, Tariff, attach. K (App.), § 1 (Market Operations), (4.0.0) with no substantive revisions to create a proposed effective date for the filing that was submitted on December 19, 2025. *See Elec. Tariff Filings*, Notice of Procedures for Making Statutory Filings When Authorization for New Or Revised Tariff Provisions is Not Required, Docket No. RM01-5-000 issued (June 3, 2020). In its transmittal, PJM requests an effective date of April 1, 2026 to implement the proposed revisions. Transmittal at 7-9.

<sup>5</sup> See Appendix for Tariff records accepted in this order.

## I. **Background**

### A. **Economic Load Response Participants in the PJM Market**

2. Retail net energy metering (NEM) resources, which are subject to the regulations of the applicable Relevant Electric Retail Regulatory Authority (RERRA), currently participate in PJM's markets as behind-the-meter resources<sup>6</sup> to facilitate load reduction. In PJM, Economic Load Response Participants<sup>7</sup> participate in the energy and ancillary services markets by providing demand response, and must meet the requirements set forth in the PJM Manuals.<sup>8</sup>

3. Under PJM's existing tariff, Economic Load Response Participants are only permitted to participate in PJM's energy and ancillary services markets (including the Regulation market) by reducing demand, and not through injections of energy, including at the retail customer point of interconnection (POI).<sup>9</sup> To the extent that a resource has

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<sup>6</sup> PJM Manual 14D, Appendix A states that a behind-the-meter unit may have capability participating in all relevant PJM Load Response Programs under the terms and conditions in effect at the time of participation in accordance with Manual 11, section 10 and Manual 18, PJM Capacity Market, section 4.3. *See* PJM, *Manual 14D: Generator Operational Requirements (Revision: 70)*, Effective: Dec. 17, 2025, <https://www.pjm.com/-/media/DotCom/documents/manuals/m14d.pdf>.

<sup>7</sup> *See* PJM, Operating Agreement, Schedule 1, § 1.5A (Economic Load Response Participant) (14.0.0), § 1.5A.3 (Registration). Economic Load Response Participants are entities that participate in the PJM energy and ancillary services markets by providing demand response. PJM, Tariff, § I.1 (Definitions E-F) (41.0.0).

<sup>8</sup> *See* PJM, Tariff, attach. K (App.), § 1.5A (Economic Load Response Participant) (14.0.0), § 1.5A.3 (Registration) and PJM, Operating Agreement, Schedule 1, § 1.5A.3. Manual 11 provides that the resource must be able to offer at least 0.1 MW of Regulation capability, receive and respond to an automatic generation control signal, complete the ancillary services certification in PJM's DR Hub system. The resource's megawatt output must be telemetered to the PJM control center in a manner determined to be acceptable by PJM and CSPs. *See* PJM, *Manual 11: Energy & Ancillary Services Market Operations (Revision: 136)*, Effective Oct. 1, 2025, <https://www.pjm.com/-/media/DotCom/documents/manuals/m11.pdf>.

<sup>9</sup> Transmittal at 3 n.8 (citing PJM, Tariff, pt. VII, subpt. F, § 335 (Wholesale Mkt. Participation Agreement/Non-Jurisdictional Agreements) (1.0.0) ("In some instances, Generation Project Developer may physically connect its Generating Facility to non-jurisdictional distribution or sub-transmission facilities in order to access the electrical Point of Interconnection on the Transmission System (the "POI"), for the purpose of engaging in FERC jurisdictional Wholesale Transactions. In those instances, Generation

the technical ability to both reduce demand and inject, and wants to participate in PJM's markets with both demand reductions and injections, it may do so by registering as an Economic Load Response Participant, and then separately registering the injection component as a distinct market resource by obtaining a Wholesale Market Participation Agreement (WMPA).<sup>10</sup>

4. An on-site generator that enables demand reduction may become an Economic Load Response Participant by complying with the requirements of: (a) the applicable RERRA; (b) all other applicable federal, state and local regulatory entities; and (c) section 1.5A of the Tariff.<sup>11</sup> The Tariff also provides for the aggregation of multiple individual end-use customer sites to qualify as an Economic Load Response Participant. Section 1.5A.3.02 of the existing Tariff specifies rules for Economic Load Response Regulation Only registration but does not specifically use the term "Economic Load Response Regulation Only Participant," as this defined term is being proposed for the first time in this filing. Principally, it provides that an Economic Load Response Regulation Only registration allows end-use customer participation in the regulation market only, and that an end-use customer that is registered as Economic Load Response Regulation Only is not permitted to register and/or participate in any other ancillary service markets at the same time. Under these existing Economic Load Response Regulation Only rules, resources that are subject to a NEM tariff are limited to load reductions and may not provide Regulation service through injection.

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Project Developer must enter into both a (1) non-jurisdictional interconnection agreement with the owner or operator of the non-jurisdictional distribution or sub-transmission facilities, which governs the physical connection of the Generating Facility to those non-jurisdictional facilities; and (2) a three-party Wholesale Market Participation Agreement ("WMPA") with PJM and the affected Transmission Owner in order to effectuate Wholesale Transactions in PJM's markets.").

<sup>10</sup> The WMPA permits a Project Developer to effectuate wholesale sales of electricity in PJM markets. Unlike a Generation Interconnection Agreement, a WMPA does not govern the physical interconnection of a resource—this is instead governed by the applicable state/local jurisdictional interconnection agreement. Transmittal at 3, n.7.

<sup>11</sup> PJM, Tariff, attach. K (App.), § 1.5A (Economic Load Response Participant) (14.0.0), § 1.5A.1 (Qualification) and PJM, Operating Agreement, Schedule 1, § 1.5A (Economic Load Response Participant) (14.0.0), § 1.5A.1 (Qualification) (14.0.0).

**B. Commission Precedent (Order Nos. 719, 719-A, and 2222)**

5. In Order Nos. 719 and 719-A, the Commission adopted opt-out and opt-in requirements for the participation of demand response resources in RTO/ISO markets.<sup>12</sup> Consistent with the opt-out and opt-in requirements of Order Nos. 719 and 719-A, the PJM Tariff provides that for end-use customers of an Electric Distribution Company (EDC) that distributed more than 4 million MWh in the previous fiscal year and after confirming that an entity has met all qualifications to be an Economic Load Response Participant, PJM will notify the relevant EDC or LSE and request verification as to whether the load that may be reduced is subject to another contractual obligation or to laws or regulations of the RERRA that prohibit or condition the end-use customer's participation in PJM's Economic Load Response Program. The EDC or LSE will have 10 business days to respond and must provide PJM with either an order, an opinion of the RERRA prohibiting or conditioning the end-use customer's participation, or an opinion of the state Attorney General, on behalf of the RERRA attesting to the existence of a regulation or law prohibiting or conditioning the end-use customer's participation. If there is no response within the 10 business-day review period, PJM assumes that the load to be reduced is not subject to other contractual obligations or to laws or regulations of the RERRA preventing such participation, and PJM will accept the registration.<sup>13</sup>

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<sup>12</sup> Specifically, the Commission directed RTOs and ISOs to amend their market rules as necessary to accept bids from aggregator of retail customers (ARC) that aggregate the demand response of: (1) the customers of utilities that distributed more than 4 million MWh in the previous fiscal year, and (2) the customers of utilities that distributed 4 million MWh or less in the previous fiscal year, where the RERRA permits such customers' demand response to be bid into organized markets by an ARC. The Order also clarified that RTOs and ISOs may not accept bids from ARCs that aggregate the demand response of: (1) the customers of utilities that distributed more than 4 million MWh in the previous fiscal year, where the RERRA prohibits such customers' demand response to be into organized markets by an ARC, or (2) the customers of utilities that distributed 4 million MWh or less in the previous fiscal year, unless the RERRA permits such customers' demand response to be bid into organize markets by an ARC. See *Wholesale Competition in Regions with Organized Elec. Mkts.*, Order No. 719, 125 FERC ¶ 61,071 (2008), *order on reh'g*, Order No. 719-A, 128 FERC ¶ 61,059, at PP 51, 60 (2009).

<sup>13</sup> PJM, Tariff, attach. K (App.), § 1.5A.3.a(i)(ii) and PJM, Operating Agreement, Schedule 1, § 1.5A.3.a(i)(ii).

6. In Order No. 2222,<sup>14</sup> the Commission required RTOs/ISOs to adopt reforms to remove barriers to the participation of distributed energy resource (DER)<sup>15</sup> aggregations in the RTO/ISO markets. As relevant here, during the subsequent compliance process, the Commission accepted PJM's proposal to specify in its tariff that Component DERs<sup>16</sup> that participate in a NEM retail program may only participate with grid injections in the PJM ancillary services markets, and may not participate with injections in PJM's energy or capacity markets.<sup>17</sup> The Commission thus found that PJM's compliance proposal appropriately avoids double counting.<sup>18</sup> The Commission accepted PJM's compliance proposal, effective February 1, 2028, as requested by PJM.

## II. PJM Filing

7. PJM submitted proposed revisions to its Tariff and Operating Agreement to effectuate the participation of a new type of market participant, known as the Economic Load Response Regulation Only Participant, in PJM's Regulation market.<sup>19</sup> According

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<sup>14</sup> *Participation of Distributed Energy Res. Aggregations in Mkts. Operated by Reg'l Transmission Orgs. & Indep. Sys. Operators*, Order No. 2222, 172 FERC ¶ 61,247 (2020), *order on reh'g*, Order No. 2222-A, 174 FERC ¶ 61,197, *order on reh'g*, Order No. 2222-B, 175 FERC ¶ 61,227 (2021).

<sup>15</sup> The Commission defined a DER as any resource located on the distribution system, any subsystem thereof or behind a customer meter. These resources may include, but are not limited to, electric storage resources, distributed generation, *demand response*, energy efficiency, thermal storage, and electric vehicles and their supply equipment. Order No. 2222, 172 FERC ¶ 61,247 at P1 n.1 (emphasis added).

<sup>16</sup> Component DER is defined as "any resource, within the PJM Region, that is located on a distribution system, any subsystem thereof, or behind a customer meter, and is used in a DER Aggregation Resource by a DER Aggregator to participate in the energy, capacity, and/or ancillary services markets of PJM through the DER Aggregator Participation Model." See PJM, Tariff, attach. K (App.), § 1.4B (DER Aggregator Participation Model) (2.1.0); *id.* § 1 (Definitions A-B) (19.1.1).

<sup>17</sup> *PJM Interconnection, L.L.C.*, 188 FERC ¶ 61,076, at P 44 (2024).

<sup>18</sup> *Id.* P 30.

<sup>19</sup> Transmittal at 1. PJM proposes to define an Economic Load Response Regulation Only Participant as: "a Member or Special Member that qualifies under Operating Agreement, Schedule 1, section 1.5A, and the parallel provisions of Tariff, Attachment K-Appendix, section 1.5A, and is only eligible to participate in the PJM Regulation market." PJM, Proposed Tariff, § I.1 (Definitions E-F) (41.0.0).

to PJM, the proposal would create an alternative means by which certain resources could provide Regulation service, in addition to the Order No. 2222 participation model, and permit such participation sooner than February 1, 2028 (i.e., the effective date of PJM's Order No. 2222 participation model).<sup>20</sup>

8. PJM explains that, under the currently effective Tariff, to the extent that the owner of a resource has the technical ability to both reduce demand and inject, and wants to participate in PJM's markets with both demand reductions and injections, it may do so by registering as an Economic Load Response Participant, and then separately registering the injection component (e.g., a back-up diesel generator) as a distinct market resource by obtaining a WMPA.<sup>21</sup> However, PJM explains that Economic Load Response Participants with resources on state/local-jurisdictional NEM tariffs are unable to participate in the PJM Regulation market with injections for two reasons. First, PJM states that Economic Load Response Participants that can inject are, by definition, not reducing demand, and accordingly cannot qualify to participate in the Regulation market while the facility is injecting. Second, PJM states that WMPAs cannot be issued for the injection component (e.g., a back-up diesel generator) of a resource that wants to participate under PJM's Economic Load Response Participant rules with both demand reductions and energy injections because the WMPA is, by its terms, designed "to effectuate Wholesale Transactions in PJM's markets."<sup>22</sup> PJM states that Wholesale Transactions are defined under the PJM Tariff as "any *transaction* involving the transmission or sale for resale of *electricity* in interstate commerce that utilizes any portion of the Transmission System."<sup>23</sup> PJM states that, by extension, wholesale settlements of energy (i.e., "electricity") are a requirement for a WMPA. According to PJM, in the case of a NEM resource, no wholesale energy settlements occur because energy injections are settled entirely pursuant to the NEM tariff, which is under state or local law.<sup>24</sup> PJM refers to the Economic Load Response Participant's inability to participate in the PJM Regulation market with injections, including the inability to obtain a WMPA for the component of its resource that can inject, as a "regulatory gap."<sup>25</sup>

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<sup>20</sup> *Id.* at 7.

<sup>21</sup> *Id.* at 3.

<sup>22</sup> *Id.* at 3 (quoting PJM, Tariff, pt. VII, subpt. F, § 335).

<sup>23</sup> Transmittal at 3-4 (citing PJM, Tariff, pt. VII, subpt. A, § 300 (Definitions W) (0.0.0)).

<sup>24</sup> *Id.* at 4.

<sup>25</sup> *Id.* at 3.

To address this gap, PJM proposes to revise the tariff to state that:

[a]n Economic Load Response Regulation Only registration may also participate in the Regulation market when the end-use customer is injecting power onto the distribution grid if it meets the following additional requirements: the end-use customer(s) must be on an associated EDC's NEM tariff; and the registration must use sub-metered data for measurement and verification in accordance with PJM's Tariff, Attachment K-Appendix, section 1.5A.4.<sup>26</sup>

9. PJM states that its proposal ensures that registration of an Economic Load Response Regulation Only Participant will be approved only if “the electric distribution company [EDC] affirms that there will be no distribution-system reliability impacts via action on the pending registration.”<sup>27</sup> PJM adds that this requirement aligns with the responsibility that electric distribution companies have for reliability of their local distribution facilities under state/local law, and is reasonable given that electric distribution companies are the entities responsible for interpreting and administering NEM tariffs under state/local law.<sup>28</sup>

10. As justification for its proposal, PJM states that the Commission has found that removing barriers to the participation of new technologies in organized markets increases competition and produces just and reasonable rates as a result.<sup>29</sup> PJM adds that permitting NEM resources to provide Regulation services to PJM's market two years earlier than otherwise scheduled will permit the market and consumers to benefit from the enhanced competition that the Commission has functionally already approved in Order No. 2222 earlier than otherwise anticipated.<sup>30</sup> Further, PJM states that its proposed Tariff and Operating Agreement revisions were conceived, formulated, designed, and

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<sup>26</sup> *Id.* at 6. See PJM, Proposed Tariff, attach. K (App.), § 1.5A.3.02 and PJM, Operating Agreement, Schedule 1, § 1.5A.3.02.

<sup>27</sup> Transmittal at 8 (citing PJM, Proposed Tariff, attach. K (App.), § 1.5A.3.(1)(a)(ii) and PJM, Operating Agreement, Schedule 1, § 1.5A.3.(1)(a)(ii)).

<sup>28</sup> Transmittal at 8.

<sup>29</sup> Transmittal at 7 (citing Order No. 719, 125 FERC ¶ 61,071 at P 1; *Elec. Storage Participation in Mkts. Operated by Reg'l Transmission Organizations & Indep. Sys. Operators*, Order No. 841, 162 FERC ¶ 61,127, at P 20 (2018)).

<sup>30</sup> PJM requests an April 1, 2026, effective date to implement the proposed revisions. Transmittal at 7-9.

vetted through the PJM stakeholder process, receiving unanimous endorsement at the September 25, 2025 PJM Markets and Reliability Committee (MRC)<sup>31</sup> and the October 23, 2025 Members Committee (MC).<sup>32</sup>

### **III. Notice of Filing and Responsive Pleadings**

11. Notice of PJM's filing was published in the *Federal Register*, 90 Fed. Reg. 61136 (Dec. 30, 2025), with interventions and protests due on or before January 9, 2026.

12. Timely motions to intervene were filed by: American Electric Power Service Corporation; Calpine Corporation; Constellation Energy Generation, LLC; and Monitoring Analytics, LLC, as Independent Market Monitor for PJM (the IMM). On January 14, 2026, NRG Business Marketing LLC and Midwest Generation, LLC (NRG/Midwest Generation) filed a motion to intervene out-of-time. On February 26, 2026, Intelligent Generation LLC (Intelligent Generation) filed a motion to intervene out-of-time and an answer.

13. On January 9, 2026, the IMM filed a protest (IMM Protest). On January 27, 2026, PJM filed a motion for leave to answer and answer (PJM Answer). On February 10, 2026, IMM filed an answer to the PJM's answer (IMM Answer). On February 26, 2026, Intelligent Generation filed an answer to the IMM's answer (Intelligent Generation Answer).

14. On February 13, 2026, Commission staff issued a deficiency letter seeking additional information, and on March 6, 2026, PJM filed its response to the deficiency letter (Deficiency Letter Response).

15. Notice of PJM's Deficiency Letter Response was published in the *Federal Register*, 91 Fed. Reg. 47 (Mar. 11, 2026), with interventions and protests due on or before March 27, 2026. On March 27, 2026, the IMM filed a protest to the Deficiency Letter Response (IMM Deficiency Letter Response Protest). On March 31, 2026, Intelligent Generation filed an answer to the IMM's protest (Intelligent Generation Deficiency Letter Response Answer). On April 10, 2026, PJM filed a motion for leave to answer and answer (PJM Deficiency Letter Response Answer).

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<sup>31</sup> See PJM, *Minutes of the Sep. 25, 2025 MRC* (Oct. 23, 2025), 20251023-consent-agenda-a---draft-mrc-minutes---9252025.pdf.

<sup>32</sup> See PJM, *Minutes of the Oct. 23, 2025 MC* (Nov. 20, 2025), 20251120-consent-agenda-a---draft-mc-minutes---10232025.pdf.

### A. IMM Protest

16. The IMM contends that PJM's proposal should be rejected because it creates discriminatory preferences for a small group of potential participants and undercuts PJM demand response rules without justification or evidence.<sup>33</sup> The IMM argues that the proposal is not simply an acceleration of the implementation of the Order No. 2222 rules for DERs, and that PJM's proposal would instead significantly change the rules that apply to economic demand resources with NEM tariffs without any detailed support or analysis.<sup>34</sup> Also, the IMM argues that the filing fails to consider the implications for the PJM markets. The IMM argues that PJM's assertion of a regulatory gap for economic demand response with NEM tariffs is incorrect because the PJM Tariff defines those resources as demand response that are currently unable to participate in the Regulation market with injections, and the Order No. 2222 rules permitting participation with injections are specific to small DERs.<sup>35</sup>

17. The IMM contends that PJM's proposal has material differences from the Order No. 2222 participation model. For example, the IMM argues that DERs in PJM's Order No. 2222 participation model have a maximum size limit of 5 MW, while the proposed Economic Load Response Regulation Only Participant has no such limit.<sup>36</sup> The IMM argues that size limit is an important feature of the Order No. 2222 participation model and that larger resources, especially those with injections, require additional processes to enter the market, including Generation Interconnection Agreements and/or WMPAs.<sup>37</sup>

18. The IMM also argues that generators, storage resources, and Component DERs in DER Aggregations must be mapped to a single pricing node, unlike demand response resources that are mapped at residual aggregate load pricing nodes.<sup>38</sup> The IMM argues that identifying a pricing node and going through the EDC registration process is a significant step for DER registrations that does not apply to demand response. The IMM contends that the single pricing node is an important feature that the Commission approved under Order No. 2222 and without it, the injections from the Economic Load

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<sup>33</sup> IMM Protest at 1.

<sup>34</sup> The IMM states PJM has not justified implementing any part of the rules earlier than the Commission approved effective date. *Id.* at 7.

<sup>35</sup> *Id.* at 2.

<sup>36</sup> *Id.* at 4-5.

<sup>37</sup> *Id.* at 5.

<sup>38</sup> *Id.* at 5-6.

Response Regulation Only resources would create flows on constraints that would be inaccurately modelled, and therefore, would be inaccurately managed.<sup>39</sup> The IMM argues that PJM's proposal ignores all these differences and would create special treatment for a specific set of resources by allowing them to participate as demand response, when they do not meet the requirements to be demand response.<sup>40</sup>

## **B. Answers**

19. PJM responds that the IMM's view is incorrect for several reasons. First, PJM argues that its proposal directly integrates Economic Load Response Regulation Only Participants into the current processes and functions of the current Regulation market and demand response rules as evidenced in the proposed definition of Economic Load Response Regulation Only Participant, which explicitly requires qualification under Operating Agreement Schedule 1, section 1.5A and Tariff, Attachment K-Appendix, section 1.5A.<sup>41</sup> PJM argues that the current rules regarding the EDC's review process enable the EDC to review and approve or reject proposed registrations for participation in the Regulation market, similar to the EDC's review process under the Order No. 2222 participation model.<sup>42</sup>

20. Second, PJM argues that the IMM's reference to the nodal requirement under the Order No. 2222 participation model is irrelevant for purposes of PJM's proposal, because resources participating in PJM's Regulation market are not required to be nodal. PJM states that the Regulation requirement<sup>43</sup> is set, and the market procures Regulation, for the entire RTO region so there are no location-specific Regulation

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<sup>39</sup> *Id.* a 6.

<sup>40</sup> *Id.*

<sup>41</sup> PJM Answer at 3.

<sup>42</sup> *Id.* at 4 (citing PJM, Tariff, attach. K (App.), § 1.5A.3.(1)(a)(ii) and PJM, Operating Agreement, Schedule 1, § 1.5A.3.(1)(a)(ii).

<sup>43</sup> PJM Tariff defines Regulation requirement as "the required megawatts of performance-adjusted Regulation capability to be maintained in a Regulation Zone. The Regulation Requirement is defined as a set megawatt value by commitment interval and can increase to account for additional operational uncertainty, in accordance with the PJM Manuals." *See* PJM, Tariff, § I.1 (Definitions R-S) (34.1.1).

products, and the Order No. 2222 participation model explicitly permits DER aggregation resources to be multi-nodal if they are providing Regulation only.<sup>44</sup>

21. Third, PJM argues that while the IMM correctly notes that there is a 5 MW size cap on Component DER under the Order No. 2222 participation model, PJM has not proposed a similar cap under its proposal for three distinct reasons: (1) PJM's proposal only applies to resources on a NEM retail tariff, which is specifically designed to permit the offsetting of all or part of the customer's own electricity requirements;<sup>45</sup> (2) PJM's proposal applies to resources participating in the Regulation market only and the Regulation requirement is relatively small, typically ranging from 550 MW to 750 MW, which naturally caps the potential size of these resources; and (3) PJM has no evidence that large, high MW generation resources are actively seeking to do business in PJM to provide Regulation only, with no energy or capacity revenues of any kind, and even if a Market Participant wanted to pursue such an effort, the EDC review process would ensure that such participation would not create a reliability issues on the distribution system.<sup>46</sup>

22. PJM argues that it is not proposing to modify the effective date of the Order No. 2222 participation model, because the Order No. 2222 participation model is not the subject of this FPA section 205 proceeding.<sup>47</sup> PJM states that it has proposed an effective date for this narrow addition, and has no need to modify the Commission-approved effective date for the Order No. 2222 participation model to do so. PJM therefore argues that Commission approval of an effective date in PJM's Order No. 2222

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<sup>44</sup> PJM Answer at 4 (citing *PJM Interconnection, L.L.C.*, Order No. 2222 Compliance Filing of PJM Interconnection, L.L.C., Docket No. ER22- 962-000, at 7 (filed Feb. 1, 2022) (“The participation model will implement a “nodal” model for energy market participation, and simultaneously permit a “multi-nodal” model for capacity and ancillary service-only DER Aggregation Resources.”)).

<sup>45</sup> PJM states that while injections are permitted, they are typically limited by the overarching requirement that systems be sized to premise load and retail NEM programs nearly always have an explicit size cap on system capacity. PJM contends that it is unaware of any cap in its footprint that is larger than 5 MW, a size that exactly mirrors PJM's existing cap on Component DER size. In fact, system capacity caps are very often much lower. *Id.* at 5.

<sup>46</sup> *Id.* at 5-6.

<sup>47</sup> PJM reiterates that it is proposing to integrate a new kind of market participant into its existing Commission-approved structures and framework for the Regulation market and demand response. *Id.* at 6.

Compliance Proceeding has no bearing on the effective date proposed in its separate FPA section 205 proceeding.<sup>48</sup>

23. In its Answer, the IMM argues that while PJM asserts that Schedule 1 of the Operating Agreement, section 1.5A includes an EDC review requirement, PJM's proposal includes no reliability assessment by PJM and no standard of review by the EDC. Specifically, the IMM argues that the proposal does not require the EDC to confirm any evaluation of the impact of the proposed resource's energy injection, as would be required for a DER Aggregation Resource.<sup>49</sup>

24. The IMM avers that PJM's response, which points to a single clearing price for Regulation, ignores the fact that the procedural and operational standards associated with accurate modeling and congestion management, namely identifying a single pricing node, apply to all injecting resources.<sup>50</sup> The IMM states that the opportunity cost of each generating resource depends on the nodal locational marginal price (LMP) and therefore the price of Regulation is a function of nodal LMPs. The IMM reiterates that Regulation deployments create physical injections and withdrawals at specific nodes, and those injections affect transmission flows and congestion.<sup>51</sup> According to the IMM, if injecting resources are not modelled nodally, they will be modelled inaccurately as part of a load aggregate and create incorrect flows in the system model. The IMM contends that although Regulation is procured at the RTO level, the precise location of injecting resources remains essential for reliable system operations, including system modeling and congestion management.<sup>52</sup>

25. Further, the IMM asserts that PJM's answer provides no evidence that the maximum size for Economic Load Response Regulation Only Participant resources will be limited to 5 MW.<sup>53</sup> The IMM notes that NEM program maximum size limits may change based on state policy decisions that are outside of PJM's control, and that PJM must have the necessary authority to establish and apply its own resource requirements to

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<sup>48</sup> *Id.* at 6.

<sup>49</sup> IMM Answer at 3-4.

<sup>50</sup> *Id.* at 4.

<sup>51</sup> *Id.*

<sup>52</sup> *Id.* at 5.

<sup>53</sup> *Id.* at 4-5.

ensure the reliable planning and operation of the PJM system, independent of externally defined program limitations.<sup>54</sup>

26. Intelligent Generation, a DER technology provider, supports PJM's proposal and contends that the IMM answer introduces technical inaccuracies regarding the reliability and physical operation of behind-the-meter injections in the Commonwealth Edison (ComEd) zone.<sup>55</sup> Intelligent Generation disputes the IMM's argument that PJM's proposal creates a discriminatory preference for NEM customers. Intelligent Generation instead argues that PJM's filing resolves a discriminatory barrier because, currently, a non-NEM customer can access the Regulation market in approximately one year via a WMPA, whereas a physically identical NEM customer is barred until 2028.<sup>56</sup>

27. Intelligent Generation argues that the IMM ignores the Commission's ruling in Order No. 841. Intelligent Generation states that Commission's Order No. 841 compliance ruling explicitly clarified that behind-the-meter energy storage resources co-located with load and sharing a single grid connection "may provide Frequency Regulation between load reduction and injection, provided that they have an Interconnection Service Agreement or a Wholesale Market Participation Agreement ['WMPA']."<sup>57</sup>

28. Intelligent Generation argues that PJM's proposal will have zero impact on nodal congestion.<sup>58</sup> Intelligent Generation asserts that Regulation signals are designed to balance grid frequency, not to move bulk power across transmission constraints. Intelligent Generation states that because the EDC has already studied and approved resources for full-capacity injection through the retail interconnection process injections in ComEd's zone, the "reliability risk alleged by the IMM is a fiction."<sup>59</sup>

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<sup>54</sup> *Id.* at 5.

<sup>55</sup> Intelligent Generation Answer at 1.

<sup>56</sup> *Id.* at 3-4.

<sup>57</sup> *Id.* at 3. See *PJM Interconnection, L.L.C.*, 169 FERC ¶ 61,049, at P 95 (2019).

<sup>58</sup> Intelligent Generation Answer at 4-5.

<sup>59</sup> *Id.* at 3-4.

29. Intelligent Generation submits that ComEd, as an EDC, actively studies injections for reliability impacts. Intelligent Generation asserts that under ComEd's tariff,<sup>60</sup> behind-the-meter storage routinely injects at full nameplate capacity during PJM's and EDC's zonal coincident peak hours to achieve Negative Peak Load Contribution (PLC) and Negative Network Service Peak Load (NSPL), respectively. Intelligent Generation asserts that ComEd allows individual PLC and NSPL values to be negative because they reduce peak demand during critical hours by providing generation to the grid.<sup>61</sup> Intelligent Generation further asserts that the retail billing for energy (kWh) and the wholesale payment for frequency Regulation (service performance) are settled in different buckets and do not overlap.<sup>62</sup>

### C. Deficiency Letter Response

30. The deficiency letter requested that PJM explain: (1) the timelines for, and scope of, the EDC reliability review, including whether the EDC will study injections made by Economic Load Response Regulation Only Participants for reliability impacts; (2) whether EDC verification of RERRA regulations would apply to injections from an Economic Load Response Regulation Only Participant; (3) how will PJM verify that the Economic Load Response Regulation Only Participant resource is enrolled in a net energy metering tariff; (4) how PJM will ensure that the services provided by net energy metering resources participating as Economic Load Response Regulation Only will not be double counted by the local distribution utility and in PJM's wholesale markets; (5) whether it is necessary for PJM to limit Economic Load Response Regulation Only resources to multiple pricing nodes within the same state, distribution utility footprint, and Transmission Zone; (6) whether Economic Load Response Regulation Only Participants would be able to participate in the Order No. 2222 participation model once that model is implemented on February 1, 2028; and (7) whether PJM intends to sunset the Economic Load Response Regulation Only Participant provisions at that time.

31. In response, PJM states that Economic Load Response Regulation Only Participants with injection capability are subject to the same EDC review process as all demand response resources. Specifically, PJM explains that, as outlined in section 10.2

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<sup>60</sup> Specifically, ComEd's net metering tariff, Rider POGNM – Parallel Operation of Retail Customer Generating Facilities with Net Metering (Rider POGNM).

<sup>61</sup> Intelligent Generation Answer at 4-5 (citing Exelon's response to deficiency letter in Docket No. ER22-1520-001).

<sup>62</sup> Intelligent Generation Answer, Ex. B (Mathematical Billing Formulas for Capacity and Network Service Peak Load Contributions).

of PJM's Manual 11,<sup>63</sup> EDCs have 10 business days to review the registration, verify that all information provided by the CSP is accurate, and ensure that the customer's participation is permitted under the rules and regulations of the RERRA.<sup>64</sup> PJM explains that, consistent with this practice, it proposes that any reliability concerns be considered by the EDC within the 10 business day review period and if the EDC finds errors or identifies reasons why the customer site should not be permitted to participate in the wholesale market, it is able to reject the registration.<sup>65</sup> PJM clarifies that currently, if the EDC does not take action to either approve or reject a registration within the 10 business day review period, the registration is automatically approved by default. PJM proposes to differentiate the implications of EDC inaction for such registrations with injection capability through its proposed tariff revisions.<sup>66</sup> PJM proposes to remove this automatic approval for Economic Load Response Regulation Only Participants with injection capability and that the EDC must proactively approve the registration before a customer is able to participate in the wholesale market. PJM explains that if the EDC takes no action following the 10-business day review period, the registration will be rejected by default.<sup>67</sup>

32. PJM states that for EDCs that distribute more than 4 million MWh, if a registration comprises both load reduction and injection capability, the EDC will verify that both the load reductions and injections are permitted to participate in the wholesale market under the relevant rules and regulations of the RERRA. PJM explains that the EDC may reject the registration if either the load reductions or injections are subject to

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<sup>63</sup> PJM, Manual 11: Energy & Ancillary Services Market Operations § 10 (rev. 136, Oct. 1, 2025), <https://www.pjm.com/-/media/DotCom/documents/manuals/m11.pdf>.

<sup>64</sup> Deficiency Letter Response at 3.

<sup>65</sup> *Id.*

<sup>66</sup> Deficiency Letter Response at 3-4; PJM, Proposed Tariff, attach. K (App.), § 1.5A.3.(1)(a)(ii) and PJM, Operating Agreement, Schedule 1, § 1.5A.3.(1)(a)(ii) (“In the absence of a response from the relevant electric distribution company or Load Serving Entity within the referenced ten Business Day review period, the Office of the Interconnection shall assume that the load to be reduced is not subject to other contractual obligations or to laws or regulations of the Relevant Electric Retail Regulatory Authority that prohibit or condition the end-use customer’s participation in PJM’s Economic Load Response Program, and the Office of the Interconnection shall accept the registration, provided it meets the requirements of this section 1.5A and is not an Economic Load Response Regulation Only registration that will inject power onto the distribution system and in accordance with the Manuals.”)

<sup>67</sup> *Id.* at 4.

another contractual obligation, or if the RERRA evidence restricts the customer's participation.<sup>68</sup> Further, PJM states that during the 10 business day review process, the EDC will verify that the customer is on a retail NEM tariff and PJM will require the CSP to indicate whether or not the end-use customer is on a NEM tariff prior to submitting the registration.<sup>69</sup>

33. PJM states that Economic Load Response Regulation Only Participants with injection capability will be subject to all existing checks for double counting because they will be participating in the wholesale market under PJM's existing Economic Load Response rules and requirements. PJM adds that it addresses double counting between retail and wholesale services by requiring a unique EDC account number be provided for each participant,<sup>70</sup> capping the nominated capacity value of a customer site at its PLC, and measuring energy load reductions using a customer baseline load. PJM also states that because frequency Regulation cannot be provided at the retail level and Economic Load Response Regulation Only Participants are not compensated for energy, there cannot be retail-wholesale double counting under the present proposal.<sup>71</sup>

34. PJM explains that Economic Load Response Regulation Only Participants with injection capability will be subject to the same geographic aggregation requirements as all other Economic Load Response Regulation Only Participants. PJM states that under the existing requirements of Tariff, Attachment K-Appendix, section 1.5A.10.01, end-use customers may aggregate to participate in PJM's Regulation market as one market unit so long as they are in the same EDC territory and Transmission Zone. PJM asserts that it does not anticipate coordination concerns between multiple EDCs because aggregations are limited to customers with the same EDC territory.<sup>72</sup>

35. PJM states that once the DER Aggregator Participation Model is implemented, Economic Load Response Regulation Only Participants with injection capability will be able to participate either in the Economic Load Response program or in the DER Aggregator Participation Model. However, to avoid double counting, if CSPs wish to transition customers into the Order No. 2222 participation model, they will be required to terminate the Economic Load Response Regulation Only Participant registration. PJM

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<sup>68</sup> *Id.* at 5.

<sup>69</sup> *Id.*

<sup>70</sup> PJM notes that if one EDC account number is entered on two active registrations, the second registration will be flagged as a duplicate. *Id.* at 6.

<sup>71</sup> *Id.*

<sup>72</sup> *Id.* at 7.

states that it does not intend to sunset the ability of injecting resources to participate in the wholesale market as Economic Load Response Regulation Only Participants because mandating their termination under one model and enrollment under another to provide the exact same service would be inefficient and needlessly disruptive to the customer and the wholesale market.<sup>73</sup>

#### **D. IMM Protest to Deficiency Letter Response**

36. The IMM argues that PJM fails to address the deficiencies identified in the deficiency letter because PJM has not shown how the proposal is consistent with the Order No. 2222 DER rules, which include defined criteria, nodal information, a size limit to protect reliability, an EDC compliance review to prevent double counting and ensure adherence to the retail tariff and applicable regulations, the identification of an electrical node, and verification that participating resources in the PJM energy, capacity, and/or ancillary service markets do not pose a threat to the reliable and safe operation of the distribution system, the public, or EDC personnel.<sup>74</sup> The IMM argues that PJM's proposal does not address a regulatory gap but rather creates regulatory inconsistencies that will persist after the implementation of the Order No. 2222 rules for DERs and a permanent loophole to allow NEM resources to inject energy in PJM's Regulation market.<sup>75</sup>

37. The IMM argues that the EDC 10-day review of any reliability and double counting issues is in contrast to the review process for a DER aggregation, which includes a 15 day initial EDC review and a 45 day reliability review. The IMM reiterates that the lack of defined criteria for the review process under the PJM proposal combined with the absence of nodal information and a maximum size limit, could create congestion patterns that PJM is neither prepared for nor able to control.<sup>76</sup>

#### **E. Intelligent Generation Answer to Deficiency Letter Response**

38. Intelligent Generation argues that the IMM misrepresents the physical reality of behind-the-meter storage and the intent of the PJM proposal. Intelligent Generation reiterates that the physical impact on the grid from a 1 MW retail injection is identical to a 1 MW injection for a PJM Regulation signal and the EDC has already studied and approved these resources for full-capacity injection through the retail interconnection

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<sup>73</sup> *Id.* at 8.

<sup>74</sup> IMM Deficiency Letter Response Protest at 5-7.

<sup>75</sup> *Id.* at 7.

<sup>76</sup> *Id.* at 5-6.

process. Thus, Intelligent Generation states that the IMM's allegation of an "unstudied" reliability risk is factually unsupported.<sup>77</sup> Further, Intelligent Generation agrees with PJM that frequency Regulation is an RTO-wide service and Regulation signals involve rapid, balanced swings (injections and withdrawals) that tend towards zero-net-energy in nature and do not move bulk power across transmission constraints.<sup>78</sup>

#### **F. PJM Deficiency Letter Response Answer**

39. PJM answers that, contrary to the IMM's contentions, the proposed rules to allow customer sites on a NEM tariff to provide Regulation only to the wholesale market while they inject are completely separate and distinct from the ancillary service participation rules under the Order No. 2222 participation model that will become effective on February 1, 2028.<sup>79</sup>

40. PJM emphasizes that the existence of multiple market participation options for one technology type is not a new concept in PJM. For example, PJM explains that distribution-connected batteries may participate in the wholesale market as a traditional generator, may opt-in to the Energy Storage Resource Participation Model, or participate via the Order No. 2222 participation model (starting February 1, 2028).<sup>80</sup> PJM reiterates that retail premises on a NEM rate that have the capability to inject will be able to participate in the Regulation market either through the Order No. 2222 participation model or as an Economic Load Response Regulation Only Participant. PJM further states that while it "strives to create parallels between different market models where appropriate, each [model] has its own set of Commission-approved rules and requirements in the Tariff."<sup>81</sup> Thus, PJM concludes that it is inaccurate to state that the existence of one of these Commission-approved market participation pathways "overturns" or "undercuts" the others.<sup>82</sup>

41. Concerning the IMM's objection to the reliability review process, PJM states that it does not plan to apply the reliability review process in the Order No. 2222 participation model to these NEM resources, because the Order No. 2222 rules are beyond the scope of

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<sup>77</sup> Intelligent Generation Deficiency Letter Response Answer at 1, 4.

<sup>78</sup> *Id.* at 4.

<sup>79</sup> PJM Deficiency Letter Response Answer at 3.

<sup>80</sup> *Id.* at 3-4.

<sup>81</sup> *Id.* at 4.

<sup>82</sup> *Id.*

this FPA section 205 proceeding. PJM reiterates that Economic Load Response Regulation Only Participants with the capability to inject will go through the same EDC review process as other demand response resources. Further, PJM contends that the IMM appears to conflate different market products and services. PJM explains that Regulation—the wholesale market at issue in the present proposal—is used to maintain system frequency. Unlike energy, PJM states that Regulation is not used to manage congestion, address constraints, or undertake other elements of grid management.<sup>83</sup>

#### **IV. Commission Determination**

##### **A. Procedural Matters**

42. Pursuant to Rule 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2025), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

43. Pursuant to Rule 214(d) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.214(d), we grant NRG/Midwest Generation’s and Intelligent Generation’s late-filed motion to intervene given their interest in the proceeding, the early stage of the proceeding, and the absence of undue prejudice or delay.

44. Rule 213(a)(2) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2), prohibits an answer to a protest unless otherwise ordered by the decisional authority. We accept the answers filed in this proceeding because they have provided information that assisted us in our decision-making process.

##### **B. Substantive Matters**

45. We find PJM’s proposed Tariff revisions to be just and reasonable and not unduly discriminatory or preferential, and we accept them effective April 1, 2026, as discussed further below.

46. Specifically, we find that PJM’s proposal is just and reasonable because it will allow Economic Load Response participants that are subject to NEM tariffs to participate in PJM’s wholesale Regulation market through injections.<sup>84</sup> In effect, we find that the

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<sup>83</sup> *Id.* at 7.

<sup>84</sup> As PJM explains, PJM will not issue WMPAs for Economic Load Response Regulation Only Participants subject to a NEM tariff customer site because, according to PJM, wholesale settlements of energy are a requirement for a WMPA and, in the case of a NEM resource, no wholesale energy settlements occur because energy injections are settled pursuant to the NEM tariff under state or local law. Transmittal at 3-4.

proposal would remove barriers to increase the participation of demand response resources in organized markets, thereby increasing competition and producing just and reasonable rates.<sup>85</sup>

47. We are unpersuaded by the objections raised by the IMM. As an initial matter, we disagree with the IMM's contention that the rules proposed in the instant filing must necessarily mirror those in PJM's Order No. 2222-compliant participation model. In Order No. 2222, the Commission clarified that "because demand response falls under the definition of [DER], an aggregator of demand response could participate as a [DER] aggregator," but stated that "this final rule does not affect existing demand response rules."<sup>86</sup> In sum, Order No. 2222 explicitly avoided disruption of existing demand response rules, and did not otherwise preclude RTOs/ISOs from permitting DERs to participate in other participation models for which they may be eligible.<sup>87</sup> Therefore, PJM's instant proposal to revise tariff rules for its Economic Load Response model need not comply with the requirements of Order No. 2222, which apply only to DER aggregations participating under the participation model(s) that an RTO/ISO adopted to comply with Order No. 2222.

48. Regarding the IMM's concerns that PJM's proposal does not contain the reliability review process contemplated in the DER aggregation rules, we find PJM's explanation that it will only approve registrations for Economic Load Response Regulation Only Participant resources if the EDC "affirms that there will be no distribution-system reliability impacts via action on the pending registration" to be sufficient, and just and reasonable. Specifically, we agree with PJM that such a requirement is reasonable given that EDCs are the entities responsible for interpreting and administering NEM tariffs under state/local law.<sup>88</sup> Further, PJM's proposed amendment to Tariff, Attachment K-Appendix, section 1.5A.3.(1)(a)(ii), and Operating Agreement, Schedule 1, section 1.5A.3.(1)(a)(ii), would require Economic Load Response Regulation Only Participants to be subject to the same EDC review process that all demand response resources currently adhere to, as detailed in PJM's Manual 11, Section 10. While the IMM asserts that the EDC review process contains an insufficient 10 business day review period, to

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<sup>85</sup> See Order No. 719, 125 FERC ¶ 61,071 at PP 1, 83.

<sup>86</sup> Order No. 2222, 172 FERC ¶ 61,247 at P 118.

<sup>87</sup> See generally Order No. 2222, 172 FERC ¶ 61,247 at PP 129-132 (establishing that RTOs/ISOs can comply with the requirement to allow DER aggregators to participate in its markets by modifying its existing participation models to facilitate the participation of DER aggregations, by establishing one or more new participation models for DER aggregations, or by adopting a combination of those two approaches).

<sup>88</sup> Transmittal at 8.

the extent an EDC is unable to complete its review in 10 business days, the registration will be rejected by default. Thus, no Economic Load Response Regulation Only resources will be able to participate without the EDC's express approval. While a retail NEM resource with injection capability may participate in the regulation market through PJM's Order No. 2222 participation model or as an Economic Load Response Regulation Only Participant, we recognize PJM's statement that it "strives to create parallels between different market models where appropriate"<sup>89</sup> and encourage PJM to consider harmonizing these market frameworks.

49. Further, we find that PJM's proposal would avoid double counting because PJM's existing rules ensure that each end-use customer only participates as part of one wholesale resource by requiring that a unique EDC account number be provided for each participant. Moreover, we agree with PJM that there cannot be retail-wholesale double counting under its proposal in light of the fact that frequency regulation cannot be provided at the retail level and Economic Load Response Regulation Only Participants are not compensated for energy.<sup>90</sup>

50. Regarding the IMM's contention that PJM's proposal creates discriminatory preferences for NEM resources, we disagree because NEM and non-NEM customers are not similarly situated. We find persuasive PJM and Intelligent Generation's arguments that, currently, a non-NEM customer can access the Regulation market in approximately one year by executing a WMPA, whereas a physically identical NEM customer is barred until 2028 (i.e., PJM's proposed effective date for its Order No. 2222 compliance). In light of this difference, PJM's proposal is not unduly discriminatory or preferential. Rather, it seeks to eliminate the barriers to the participation of NEM resources that can inject in the Regulation market.<sup>91</sup>

51. We disagree with the IMM's contention that if proposed Economic Load Response Regulation Only Participants are not modelled on a nodal basis, injections from these resources would "create flows on constraints that would be inaccurately modelled, and therefore, would be inaccurately managed."<sup>92</sup> We find that PJM has adequately explained that resources participating in its Regulation market are not required to be

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<sup>89</sup> PJM Answer at 4.

<sup>90</sup> See PJM, Tariff, attach. K (App.), §§ 1.5A.4.(a), 1.5A.10.01.

<sup>91</sup> See, e.g., *Entergy Services, Inc.*, 93 FERC ¶ 61,156 (2000) ("It is not undue discrimination to treat categories of customers with dissimilar characteristics differently.") (citing *Cities of Bethany v. FERC*, 727 F.2d 1131, 1138-39 (D.C. Cir. 1984)).

<sup>92</sup> IMM Initial Comments at 6.

nodal. As PJM notes, there are no location-specific Regulation products in its market, which is consistent with the fact that PJM does not use Regulation to manage congestion, address constraints, or undertake other elements of grid management.<sup>93</sup>

52. Regarding the lack of maximum size limitation for Economic Load Response Regulation Only participants, we find that such a requirement is not necessary and as discussed above, this proposal is not subject to the requirements set forth in Order No. 2222.<sup>94</sup> Further, as PJM explains, the Regulation requirement is relatively small, ranging between 550 MW and 750 MW, which naturally caps the potential size of these resources.<sup>95</sup> Additionally, we recognize PJM's argument that there is no evidence that large, high MW generation resources are actively seeking to participate in PJM's Regulation market without also participating in energy or capacity markets. We agree with PJM that the EDC review process should ensure that such participation would not introduce reliability issues on the distribution system.<sup>96</sup>

The Commission orders:

PJM's proposed Tariff revisions are hereby accepted, effective April 1, 2026, as discussed in the body of this order.

By the Commission.

( S E A L )

Debbie-Anne A. Reese,  
Secretary.

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<sup>93</sup> See PJM Deficiency Letter Response Answer at 7.

<sup>94</sup> In any event, Order No. 2222 did not require that RTOs/ISOs adopt a maximum size requirement for DERs participating in DER aggregations. See Order 2222, 172 FERC ¶ 61,247 at P 181 (requiring each RTO/ISO to either propose a maximum capacity requirement for individual DERs participating in its markets through a DER aggregation or, alternatively, to explain why such a requirement is not necessary).

<sup>95</sup> PJM Answer at 5-6 (citing PJM, *Regulation Effective Megawatt Requirement Definition and Annual Adjustment Metric*, <https://www.pjm.com/-/media/DotCom/markets-ops/ancillary/regulation-effective-mw-requirement-definition-2025-2026.pdf>).

<sup>96</sup> PJM Answer at 5.

## **Appendix – Tariff Records**

### PJM Interconnection, L.L.C., Intra-PJM Tariffs

#### **Docket No. ER26-846-000**

- [E-F, OATT Definitions - E - F \(44.0.0\)](#)
- [O-P-Q, OATT Definitions - O - P - Q \(37.0.0\)](#)
- [OATT ATT K APPX SEC 1, OATT ATTACHMENT K APPENDIX SECTION 1 - MARKET OPERATIONS \(4.0.0\)](#)
- [OATT ATT K APPX Sec 1.5A, OATT Attachment K Appendix Sec 1.5A Economic Load Resp \(15.0.0\)](#)
- [E-F, OA Definitions E - F \(25.0.0\)](#)
- [O-P, OA Definitions O - P \(26.0.0\)](#)
- [OA Schedule 1 Sec 1.5A, OA Schedule 1 Sec 1.5A Economic Load Response Participant \(15.0.0\)](#)

#### **Docket No. ER26-846-001**

- [E-F, OATT Definitions - E - F \(44.1.0\)](#)
- [O-P-Q, OATT Definitions - O - P - Q \(37.1.0\)](#)
- [OATT ATT K APPX Sec 1.5A, OATT Attachment K Appendix Sec 1.5A Economic Load Resp \(15.1.0\)](#)
- [E-F, OA Definitions E - F \(25.1.0\)](#)
- [O-P, OA Definitions O - P \(26.1.0\)](#)
- [OA Schedule 1 Sec 1.5A, OA Schedule 1 Sec 1.5A Economic Load Response Participant \(15.1.0\)](#)