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March 12, 2026

James B. Robb
President and CEO
North American Electric Reliability Corporation
1401 H Street NW
Suite 410
Washington, DC 20005

Re: FERC Co-Located Load Order Docket No. EL25-49

Dear Mr. Robb:

I am writing to bring this to your attention, recognizing that you understand the importance of maintaining and increasing electric generation capacity in PJM. On December 18, 2025 FERC issued Order EL25-49 to address the massive data center projects co-locating with wholesale generators in the PJM Interconnection. In so doing, the changes directly and negatively impacted manufacturing companies who have invested their own capital in behind-the-meter self-generation to lower costs and increase competitiveness. Manufacturing self-generation facilities are not data centers and should not be treated like one.^{1 2}

Unless manufacturing behind-the-meter self-generation facilities are held harmless, 53 behind-the-meter facilities in PJM with nameplate generating capacity of 2,416 MWs and produces 11,122,273 MWhs behind-the-meter will be economically impacted.³ These are mostly combined heat and power (CHP) facilities that economically generate electricity and steam that is used to operate manufacturing facilities that employ millions of employees.

¹ Manufacturing Behind the Meter Generation Loads Should Not be Treated Like Data Center Loads, https://www.ieca-us.org/wp-content/uploads/03.10.26_Mfging-BHTM-self-generation-is-Not-Like-Data-Centers.pdf

² FERC PJM Large Load Rule Damages Manufacturing Self-Generation Economics, https://www.ieca-us.org/wp-content/uploads/02.27.26_Wright_Burgum-Letter_-CHP-Do-No-Harm_FINAL.pdf

³ U.S. Energy Information Administration

Without changes to the rule to protect longstanding PJM rules, these generation units will no longer be economic and the affected manufacturing companies will begin to purchase power from the grid at a time when more generation is needed, not less. The solution is to preserve the long-standing PJM practices to be billed on a “net basis” versus a “gross load” basis.

The unintended consequences of the FERC rule, if not changed, could set a nationwide precedent with severe implications for U.S. manufacturing competitiveness. I look forward to hearing from you and the actions necessary to protect manufacturing jobs.

Sincerely,

Paul N. Cicio
Paul N. Cicio
President & CEO

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.3 trillion in annual sales, over 12,000 facilities nationwide, and with more than 1.9 million employees. One hundred percent of IECA members are manufacturing companies whose competitiveness is largely determined by the cost and reliability of natural gas and electricity. IECA's sole mission is to reduce and avoid energy costs and increase energy reliability through advocacy in Congress and regulatory agencies, such as the Federal Energy Regulatory Commission (FERC). IECA membership represents a diverse set of industries including chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, consumer goods, building products, automotive, independent oil refining, and cement.