UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C. **Docket No. ER26-3515-000**

COMMENTS OF THE INDUSTRIAL ENERGY CONSUMERS OF AMERICA

The Industrial Energy Consumers of America (IECA) respectfully submits these Comments in response to the Proposal of PJM Interconnection, L.L.C. to Establish Interim Resource Adequacy Service and A Large Load Registry to Address System Reliability ("IRAS Filing"), which was filed at the Federal Energy Regulatory Commission ("FERC" or "Commission") in the above- referenced docket.

The Industrial Energy Consumers of America (IECA) 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. Many of these companies are located within PJM. 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, national defense industries, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, consumer goods, building products, automotive, independent oil refining, and cement.

IECA supports the recommendations provided by PJMICC.

I. Existing large loads should be excluded from the Large Load Registry. The registry's purpose is to track new large loads driving new system costs, not existing customers already integrated into the grid and reflected in historical forecasts. If existing loads are included for informational purposes, they must be clearly exempted from all IRAS operational obligations — including curtailment, BYONC requirements, and RPM auction adjustments — and any collected data must be subject to robust confidentiality protections.

II. Ordinary load fluctuations should not subject existing customers to IRAS. PJM's definition of "new" vs. "existing" Large Load must distinguish between genuine new load growth and normal operational variation at existing facilities. The baseline measurement should not confuse normal business operational fluctuations as being new load growth associated with business expansions, triggering IRAS for customers that have effectively been operating as existing Large Loads.

III. Incremental expansions should trigger IRAS obligations only for the net new MW above 50 MW. As a threshold matter, it must be noted that very little evidence has been presented that 50 MW is an appropriate bright-line trigger for the obligations set forth by PJM's instant filing. Many of the new computational loads are significantly in excess of 50 MW, whereas 50 MW is not unusual for an industrial or institutional facility. When an existing Large Load facility expands, only load growth over 50 MW from the baseline should be subject to IRAS. (That is, a 50 MW facility should not be subjected to IRAS until it expands beyond 100 MW.) PJM should adopt bright-line, easy-to-implement grandfathering rules for pre-expansion load, clear methodologies for measuring incremental growth, and anti-gaming provisions, while avoiding a framework that chills legitimate phased and planned development.

IV. IRAS participants should not receive compensation that shifts costs to other ratepayers. Compensating new large loads for IRAS curtailment — and recovering those costs broadly through retail rates — directly contradicts the Ratepayer Protection Pledge's commitment that new computational loads will not increase electricity costs for other consumers. If any compensation is provided, it should be funded by the new large-load customer base itself; States must retain full discretion to set the rate at zero without risking a violation of the filed rate doctrine.

V. PJM's "peak load" measurement in the New Large Load definition should align with FERC-approved retail BTMG rules. Load netted against on-site generation under BTMG should be measured in a similar manner for IRAS purposes, providing certainty to retail customers who have invested in resource adequacy through retail BTMG.

Sincerely,

Paul N. Cicio

Paul N. Cicio

President & CEO
Industrial Energy Consumers of America
1050 Connecticut Ave, NW, Suite 500
Washington, DC 20036
(C) 703-216-7402
www.ieca-us.org
pcicio@ieca-us.org

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