**UNITED STATES OF AMERICA**
**FEDERAL ENERGY REGULATORY COMMISSION**

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

**REQUEST FOR CLARIFICATION**
**OR, IN THE ALTERNATIVE, REHEARING**
**OF THE PJM INDUSTRIAL CUSTOMER COALITION AND STEEL PRODUCERS**

Pursuant to Rule 713 of the Federal Energy Regulatory Commission's ("Commission" or "FERC") Rules of Practice and Procedure,[1] the PJM Industrial Customer Coalition ("PJMICC") and Steel Producers respectfully request clarification or, in the alternative, rehearing of portions of the Commission's October 9, 2026, Order Accepting Tariff Revisions in Part and Rejecting Tariff Revisions in Part ("October 9 Order" or "Order") pertaining to the applicability of the Large Load Registry ("Registry") to industrial and manufacturing loads and the Registry's confidentiality rules.[2] PJMICC is authorized to state that the Industrial Energy Consumers of America ("IECA") strongly supports this Request.[3]

## I. INTRODUCTION

The October 9 Order rejected PJM's proposed Interim Resource Adequacy Service ("IRAS") and Bring Your Own New Capacity ("BYONC") frameworks, which were the core of PJM's Section 205 filing on August 13, 2026.[4] However, the Commission accepted PJM's proposal to create a Registry and accepted PJM's proposed definition of Large Load.

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[1] *See* 18 C.F.R. § 385.713.
[2] *PJM Interconnection, L.L.C.*, 197 FERC ¶ 61,019 (Order issued Oct. 9, 2026) ("October 9 Order").
[3] IECA filed out-of-time Comments in this docket, which the Commission accepted in its October 9 Order. October 9 Order at P 10. However, IECA did not intervene or seek party status in this proceeding and does not seek such status by this Request.
[4] October 9 Order at PP 2, 13-14.

PJMICC and Steel Producers appreciate the Commission's statements affirming that existing protections in the PJM Operating Agreement ("OA") will apply to retail customers listed in the Registry.[5] However, the Registry will compile some of the most commercially sensitive information that energy-intensive manufacturers and institutions possess—data concerning who they are, where they operate, how much power they use, how they back up their operations, and with whom they contract for supply and at what rates. Without certain clarifications regarding who may see that information and for what purpose, the Registry risks becoming a source of competitive intelligence rather than a reliability tool. Absent the clarifications requested herein, the October 9 Order would be arbitrary and capricious because it does not address how Registry data will be protected from uses that could confer market power in PJM's electric markets or undermine competition in critical American industries.

Clarification is necessary because OA protections must be applied to retail customers, including to customers who are *not signatories to the OA and do not have the privileges of PJM Membership*. PJMICC and Steel Producers therefore respectfully request that the Commission clarify the scope of Registry data and the scope of access to Registry data in order to ensure protection of competitively sensitive retail customer information while enabling targeted access to the information necessary to support reliable operations and planning. PJMICC and Steel Producers also submit an alternative Request for Rehearing, in the event the Commission does not grant the requested clarifications.

## II. EXECUTIVE SUMMARY

PJMICC is a coalition of energy-intensive industrial and institutional customers in the PJM region, including manufacturers of paper, cement, chemicals, metals, pharmaceutical products, and

[5] *Id.* at PP 49-50.

consumer goods, as well as hospitals and universities.[6] Steel Producers consists of the steel mills owned by (i) Steel Dynamics, Inc., and (ii) Nucor Corporation that are located in the PJM footprint. 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 them in PJM's territory. Together, PJMICC, Steel Producers, and IECA represent many retail customers whose competitiveness is largely determined by the cost and reliability of natural gas and electricity. These retail customers have traditionally been thought of as "large" users but are, in most cases, much smaller than the large data center projects that are being added to the grid.

The October 9 Order accepts PJM's Registry, which will gather into a single location, for each Large Load of 50 MW or more, information such as the customer's identity, location, in-service dates, peak load and ramp schedule, telemetry specifications, backup generation (including fuel type and permitting limitations), and contracts or service agreements with its Load Serving Entity ("LSE"), which may include power supply rate information.[7] Because the Commission rejected IRAS, all retail customers that satisfy the definition of Large Load, including some existing PJMICC and Steel Producers members, will be included in the Registry for "informational purposes" only.[8]

The Order finds that PJM's existing confidentiality rules under section 18.17 of the PJM Operating Agreement ("OA") will adequately safeguard Registry data.[9] This holding is significant, but section 18.17 of the OA was not expressly designed for retail end-use customer data, and the Order does not specify how access will be limited among the many entities eligible to receive it.

[6] Comments of the PJM Industrial Customer Coalition, Docket No. ER26-3515-000, at 1, 3 (Sept. 3, 2026) ("PJMICC Comments").
[7] October 9 Order at PP 16, 33.
[8] *Id.* at P 50.
[9] October 9 Order at P 49.

The October 9 Order therefore fails "to consider an important aspect of the problem"[10] and does not address the significant competitive and security implications of disclosure. Accordingly, PJMICC and Steel Producers request that the Commission clarify that:

1. PJM must segment access to Registry data on a "need-to-know" basis, so that each recipient receives only the data relevant to its own planning and operational responsibilities, consistent with the scope limits in OA section 18.17.7, which provides for Transmission Owners to receive only confidential generator data that impacts that Transmission Owner's planning.

2. Confidentiality protections for retail customer data in the Registry will be no less restrictive than those for generator data, including limiting access to operational employees and prohibiting disclosure to marketing employees.

3. An LSE may access Registry data only for the Large Loads that it serves, not as a broad-based access to potential customers, consistent with OA Section 18.17.7.

4. Retail customers listed in the Registry will have the same rights as PJM Members under OA section 18.17 to designate data as confidential and prevent it from being disclosed to other PJM Members or others.

5. Information on retail customer rates or pricing will be excluded from the Registry and redacted from contracts that are added to the Registry.

These clarifications are consistent with the Commission's October 9 Order, with PJM's commitment to limit Registry access to "as small a universe of entities as possible," and with the protections the OA already affords generator data.[11]

However, if the Commission does not grant the requested clarifications, PJMICC and Steel Producers respectfully request rehearing, as set forth below.

## III. STATEMENT OF ISSUES/ERRORS FOR ALTERNATIVE REHEARING REQUEST

If the Commission grants all of the above requested clarifications in full, the issues and errors raised in PJMICC's and Steel Producers' alternative request for rehearing will be resolved.

[10] *Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co*., 463 U.S. 29, 43 (1983) ("an agency rule would be arbitrary and capricious if the agency . . . failed to consider an important aspect of the problem").
[11] October 9 Order at P 42; OA § 18.17.7.

However, if the Commission does not grant the requested clarifications in full, PJMICC and Steel Producers seek rehearing on the following issues:

1. The October 9 Order errs because it does not provide substantial evidence to support the inclusion of existing Large Loads, including industrial customers, in the Registry, even for "informational purposes." 5 U.S.C. § 706(2)(A); *Vistra Corp. v. FERC*, 80 F.4th at 312; *South Carolina Pub. Serv. Auth. v. FERC*, 762 F.3d 41, 55 (D.C. Cir. 2014); *Sacramento Mun. Util. Dist. v. FERC*, 616 F.3d 520, 528 (D.C. Cir. 2010).

2. The October 9 Order is arbitrary and capricious because it does not sufficiently account for the critical nature of the information the Registry will collect and the need to protect that information consistent with governing rules. 5 U.S.C. § 706(2)(A); *Vistra Corp. v. FERC*, 80 F.4th at 312; *South Carolina Pub. Serv. Auth. v. FERC*, 762 F.3d 41, 55 (D.C. Cir. 2014); *Sacramento Mun. Util. Dist. v. FERC*, 616 F.3d 520, 528 (D.C. Cir. 2010).

3. The October 9 Order is unjust, unreasonable, and unduly discriminatory or preferential because it affords retail customer data less protection than the Operating Agreement affords generator data. 16 U.S. Code § 824d-824e; *California Indep. Sys. Operator Corp. v. FERC*, 372 F.3d 395, 400 (D.C. Cir. 2004); *S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014).

4. The October 9 Order errs by permitting access to undefined "other entities" and to LSEs and other entities who have marketing functions without clearly defined limitation, contrary to the Commission's duty to protect consumers and competitive markets. NAACP v. FPC, 425 U.S. 662, (1976); *Pub. Util. Dist. No. 1 of Snohomish Cnty., Wash. v. FERC*, 272 F.3d 607 (D.C. Cir. 2001). *See also* 18 C.F.R. § 35.34(k)(6).

5. The October 9 Order errs by approving the Registry despite rejection of the IRAS proposal that the Registry was designed to support, without substantial evidence that the Registry is properly designed for non-IRAS purposes. 5 U.S.C. § 706(2)(A); *Vistra Corp. v. FERC*, 80 F.4th at 312; *South Carolina Pub. Serv. Auth. v. FERC*, 762 F.3d 41, 55 (D.C. Cir. 2014); *Sacramento Mun. Util. Dist. v. FERC*, 616 F.3d 520, 528 (D.C. Cir. 2010).

## IV. PROCEDURAL HISTORY

On August 13, 2026, PJM filed, pursuant to section 205 of the Federal Power Act ("FPA")[12], proposed revisions to its Open Access Transmission Tariff ("Tariff") and Reliability Assurance Agreement ("RAA") to establish: (1) a definition of Large Load; (2) a Large Load Registry; (3) a new service known as IRAS, which was proposed as a program to require New

[12] 16 U.S. Code § 824d.

Large Loads to bring their own sources of power or to be curtailed earlier than other load during a grid emergency; (4) a requirement for LSEs serving New Large Load (as defined in PJM's Tariff proposal) to designate new capacity resources; (5) rules for BYONC arrangements; and (6) rules to exclude Eligible New Large Load from the Variable Resource Requirement ("VRR") curve (collectively, "IRAS Filing").[13] Notice of the filing was published in the Federal Register, with interventions and protests due on or before September 3, 2026.[14] PJMICC filed a doc-less Motion to Intervene on August 14, 2026, and filed Comments ("PJMICC Comments") on September 3, 2026, urging, among other things, that existing Large Loads be excluded from the Registry or, if included, be afforded due process and robust confidentiality protections.[15] On September 3, 2026, Steel Producers filed a doc-less Motion to Intervene. On September 15, IECA filed out-of-time Comments ("IECA Comments"), which the Commission accepted in its October 9 Order.[16]

On October 9, 2026, the Commission issued the October 9 Order, accepting PJM's proposal to establish the Registry and approving PJM's definition of Large Load, while rejecting the remainder of PJM's proposal, and directing PJM to submit a compliance filing within 30 days.[17] While the Commission addressed some of PJMICC's Comments, it did not address certain concerns in sufficient detail to explain how retail customer data will be meaningfully protected. Consequently, PJMICC and Steel Producers timely submit this Request for Clarification or, in the Alternative, Rehearing in response to the October 9 Order.[18]

[13] October 9 Order at P 1.
[14] *Id.* at P 5 (citing 91 Fed. Reg. 53407 (Aug. 18, 2026)).
[15] PJMICC Comments at 5-8.
[16] The Commission accepted IECA's out-of-time comments in its October 9 Order. *See* October 9 Order at P 10.
[17] October 9 Order at PP 2, 13, 48.
[18] 16 U.S.C. § 825l(a); 18 C.F.R. § 385.713.

## V. REQUEST FOR CLARIFICATION

PJMICC and Steel Producers respectfully request clarification regarding five issues: (1) segmentation of Registry data on a "need-to-know" basis; (2) confidentiality protections for retail customer data that are no less restrictive than those for generator data; (3) limitation of each LSE's access to data for its own customers; (4) confirmation that retail customers listed in the Registry will have the same rights as PJM Members under OA section 18.17; and (5) exclusion or redaction of information on retail customers' rates or pricing.

As a threshold point, competition is the foundation of PJM markets. The emphasis in this Request for Clarification on the need for specific confidentiality clarifications is directly related to the importance confidentiality plays in competitive markets—both electric markets and the industries in which Large Load customers serve. Without confidentiality regarding key terms such as supplier relationships, contracts, load information, and more, competition will be undermined, and the risks of market power and antitrust concerns will increase. Further, there is a direct line from confidentiality to competition and from competition to affordability: competitive markets discipline prices only when market participants cannot exploit non-public information about their customers and rivals.

Additionally, in restructured states, a customer's supplier relationship is typically confidential, and disclosure of retail customers' LSEs could affect the functioning of retail markets.[19] Further, confidentiality has antitrust considerations: Customer-specific load, contract, and supplier data shared among LSEs and competitive suppliers could facilitate coordination, targeting, or segmenting of customers or customer bases.

[19] PJMICC Comments, at 6.

The Commission and PJM both recognize that PJM's existing rules contemplate these concerns. The rules already mask resource names, load identity, and submitter identity to protect market-sensitive information.[20] The rules also provide for data segmentation on a "need-to-know" basis. Registry data warrants at least equivalent protection. The FERC should affirm that these protections apply on an equivalent basis to load, as set forth below.

### A. The Commission should clarify that PJM must collect and segment access to Registry data on a "need-to-know" basis.

The Order accepts PJM's proposal to make Registry information available to Authorized Commissions, Transmission Owners, Electric Distributors, LSEs, the Independent Market Monitor ("IMM"), the Commission, and other entities, "subject to appropriate confidentiality and data protection safeguards."[21] PJM itself acknowledged that the Registry "is expected to collect information that may be confidential or commercially sensitive, or that may implicate infrastructure security concerns," and that it therefore must permit access to "as small a universe of entities as possible."[22] In rejecting requests for broader access, the Commission explained that "the Large Load Registry will be available only to entities that already have access to this sort of information and consistent with existing confidentiality rules," rules "that currently do not allow state consumer advocates or similar entities to have access to this type of information."[23] However, beyond this, the Order does not specify how that universe will be limited in practice, or whether each recipient will receive the entire Registry or only the portion relevant to its responsibilities.

The OA already provides a model. When PJM shares confidential generator information with Transmission Owners, it does so only for generators that are or will be "modeled within the

[20] OA § 18.17.1(e)(i).
[21] October 9 Order at P 49. *See also id.* at P 34.
[22] *Id*. at P 42.
[23] *Id.* at P 49.

Transmission Owner's energy management system" or "identified in a Transmission Owner's restoration plan."[24] The same principle should govern the Registry: a Transmission Owner or Electric Distributor should receive data only for Large Loads located on or directly affecting its own system, and no recipient should receive Registry data beyond what it needs to perform its planning and operational responsibilities. The Commission should clarify that this principle of the OA applies to retail customers' data and that PJM must implement this need-to-know segmentation in its compliance filing or the PJM Manuals.

Further, because the Commission rejected IRAS, the core reason for developing the Registry is no longer present. The Commission did affirm in the October 9 Order that the Registry will "provide PJM with the information necessary to address operational impacts" of Large Loads and "enable PJM to better forecast load growth and to plan and manage its transmission system."[25] In addition to segmenting data PJM does collect, the Commission should clarify that PJM's data collection must be limited to data that relates to the operational and planning purposes set forth in the Order.

### B. The Commission should clarify that confidentiality protections for retail customer data in the Registry will be no less restrictive than the protections for generator data.

Generator data is provided substantial protection in the OA, and for good reason: in PJM, generators operate in a competitive marketplace. Per the OA, confidential generator data provided to Transmission Owners may be provided "only to transmission function employees," may be used only for the Transmission Owner's reliability and transmission functions, and may not be disclosed "to any person, including marketing function employees," except as expressly permitted.[26]

[24] OA § 18.17.7(a).
[25] October 9 Order at P 48.
[26] OA § 18.17.7(c)-(d).

Similarly, data available on PJM's Energy Management System ("EMS") terminals must be held in the Transmission Owner's secure control room and may not be disclosed to "marketing organizations, energy affiliates or independent third parties."[27]

Retail customer data in the Registry has similar competitive and security sensitivities as generator data. PJM may not know or understand retail customers' competitive sensitivities, as retail customers operate within particular industries. As PJMICC explained in its Comments, however, knowledge of a manufacturer's load size, location, demand response participation, and LSE relationships enables competitors, including international competitors, to infer critical operational intelligence.[28] The Registry will also contain backup generation details, permitting limitations, and contracts or service agreements between the Large Load and its LSE, which may include power supply rate information.[29] A large manufacturer's load profile and supply contracts should be viewed as at least as sensitive as a generator's real-time output. The Commission should clarify that Registry data will be disclosed only to transmission function (or equivalent planning and operations) personnel and will not be disclosed to marketing function employees, consistent with the separation of transmission and marketing functions under the Commission's Standards of Conduct, 18 C.F.R. Part 358.

### C. The Commission should clarify that an LSE may access Registry data only for the Large Loads that it serves.

The Order confirms that the LSE serving a Large Load is obligated to provide the Registry information for that customer.[30] It does not follow that every LSE should have access to the Registry information of *every other LSE's customers*. Many LSEs, particularly competitive retail

[27] OA § 18.17.6(c).
[28] PJMICC Comments at 6.
[29] October 9 Order at P 33.
[30] *Id.* at PP 43, 50.

suppliers, have marketing functions and compete to serve Large Loads. In restructured states, a customer's supplier relationship is typically confidential, and disclosure of that relationship could affect the functioning of retail markets.[31] A competitive supplier seeking to serve a Large Load should not have access to information that is confidential between that customer and its current LSE.[32] The Commission should clarify that an LSE's access to Registry data is limited to its own customers and that Registry data may not be used as a marketing tool.

### D. The Commission should clarify that retail customers listed in the Registry will have the same rights as PJM Members under OA section 18.17 to designate data as confidential and prevent it from being disclosed.

Under the OA, Members are provided with specific rights and protections, such as the right to designate information as confidential and to prevent its disclosure to other PJM Members. As explained above, many retail customers are not PJM Members. Consequently, to ensure that the OA protections apply to retail customers in the Registry, PJMICC and Steel Producers respectfully request that the Commission clarify that retail customers' data is automatically deemed confidential upon entry into the Registry or, at a minimum, that retail customers have sufficient opportunity to designate their own data in the Registry as confidential.

These clarifications matter because confidentiality is necessary to support competition in the energy industry and key industries that support the nation's economic growth. Additionally, confidentiality protection is needed for retail customers, particularly manufacturers, who must compete globally and for whom information in the Registry could be used as competitive intelligence by competitors.

[31] PJMICC Comments at 6.

[32] Broad access to customer utility account numbers in the Registry could also create security concerns, such as the possibility of unauthorized switching of a customer's supplier, or of demand response aggregators erroneously enrolling assets in programs.

### E. The Commission should clarify that information on rates will be excluded from the Registry and redacted from contracts that are added to the Registry.

A Large Load retail customer's electric rate or pricing information is one of the most sensitive pieces of competitive intelligence in its possession. It is closely guarded by many retail customers and is a core component of those customers' relationships with their respective LSEs. As mentioned above, many Large Load retail customers must compete globally in their respective industries. Their rates and contract terms are central to these customers' competitiveness.

A Large Load retail customer's rate or pricing information is not necessary for Transmission Owners, EDCs, LSEs, or PJM to perform planning or operational responsibilities. Because rate and pricing information is highly confidential and central to a retail customer's competitiveness, it should not be included in the Registry or, if it is included in contracts on file with the Registry, should be redacted for all recipients.

## VI. ALTERNATIVE REQUEST FOR REHEARING

If the Commission does not grant the clarifications requested above, PJMICC and Steel Producers respectfully request rehearing on the issues identified in Section III. First, the October 9 Order does not provide substantial evidence to support the inclusion of existing Large Load, including industrial customers and other energy-intensive customers, in the Registry.[33] The Commission recognized that, because IRAS was rejected, industrial customers will be included in the Registry only for informational purposes.[34] The October 9 Order's sole stated basis for including them is that PJM must have visibility into the full spectrum of Large Loads in its footprint.[35] The Order identifies no record evidence explaining why that visibility requires collecting existing customers' contracts, power supply rate information, supplier relationships,

[33] *See* 16 U.S.C. § 825l(b); 5 U.S.C. § 706(2)(A), (E).
[34] October 9 Order at P 50.
[35] *Id.* at PP 44, 50.

backup generation and permitting limits, and other site-specific data, much of which state-regulated utilities already hold subject to state confidentiality rules.

Second, the Order arbitrarily and capriciously fails to account for the critical nature of the information the Registry will collect and the need to protect that information in a manner consistent with governing rules. The Registry will compile site-level data on location, telemetry, backup generation, and contracts for each Large Load, which may include power supply rate information.[36] PJM itself acknowledged that the Registry may implicate infrastructure security concerns.[37] The Commission's own regulations protect Critical Energy/Electric Infrastructure Information ("CEII"),[38] and PJM's Operating Agreement recognizes that real-time grid and generator data may constitute CEII and strictly limits their use and disclosure.[39] Yet the Order accepts the Registry's safeguards solely by reference to PJM's existing confidentiality rules,[40] without addressing the fact that those rules expressly attach to Member data designated as confidential,[41] but do not expressly attach to retail customers listed in the Registry who are not PJM Members and cannot themselves designate their data as confidential. An agency's failure to appreciate the practical consequences of its legal determinations is arbitrary and capricious.[42]

Third, the Order affords retail customer data less protection than the OA affords generator data.[43] Generator data is provided substantial protection in the OA, but without an affirmative

[36] *Id.* at P 33.
[37] *Id.* at P 42.
[38] *See* 18 C.F.R. § 388.113.
[39] *See* OA § 18.17.6(b)-(c) (stating, in part, "The data and information produced by the EMS or other situational awareness tool, are confidential and/or commercially sensitive because they will display the real-time status of electric transmission lines and generation facilities, the disclosure of which could impact the market and the commercial interests of its participants. In addition, the responsive information will contain detailed information about real-time grid conditions, transmission lines, power flows, and outages, which may fall within the definition of Critical Energy Infrastructure Information (CEII) as set forth in 18 CFR § 388.113.").
[40] October 9 Order at P 49.
[41] OA § 18.17.1(a)-(b).
[42] *See State Farm*, 463 U.S. at 43.
[43] See OA § 18.17.7(c)-(d).

statement by the Commission that retail customer data must be protected on an equal basis to generator data, there remains uncertainty around whether retail customers will be adequately protected. This is unduly discriminatory. Both retail customers and generators operate in competitive contexts. Both are price-sensitive. Both rely on protection of strategic information. As a result, it would be unduly discriminatory to afford generators greater protection since retail customers and generators are similarly situated with respect to the need to protect competitive intelligence.

Fourth, the Order does not reconcile its acceptance of the Registry with the Commission's responsibility to protect consumers and competitive markets.[44] The Commission's stated mission is to "[a]ssist consumers in obtaining reliable, safe, secure, and economically efficient energy services at a reasonable cost through appropriate regulatory and market means, and collaborative effort."[45] Customer-specific load, contract, rate, and supplier data shared among LSEs and competitive suppliers could facilitate coordination, targeting, or segmenting of customers or customer bases, increasing the risk of market power abuse and antitrust concerns. By permitting access to undefined "other entities,"[46] and without limiting LSEs and other entities with marketing functions to non-marketing purposes, the Order is unjust, unreasonable, and unduly discriminatory or preferential.

Finally, the October 9 Order errs in approving the Registry while rejecting IRAS because the Registry was designed to support IRAS. While PJM consented to severance of the Registry from other parts of the filing, its justification for the Registry *without* IRAS was general, stating

[44] *See* 16 U.S. Code §§ 824d, 824e; *see also NAACP v. FPC*, 425 U.S. 662, 670 (1976) (explaining that the "public interest" phrasing of the Federal Power Act and Natural Gas Act as a directive to "promote the orderly production of plentiful supplies of electric energy and natural gas at just and reasonable rates").
[45] FERC, What FERC Does, https://www.ferc.gov/what-ferc.
[46] October 9 Order at P 49.

in part, "The registry will enable PJM to better forecast load growth, plan and manage the transmission system, and study and provide the anticipated new transmission services for co-located loads and Large Loads."[47] However, if the objective is to increase forecasting accuracy, the record does not explain how collecting such an extensive set of data into the Registry would improve upon the large load data that EDCs already compile, such as peak load contributions ("PLC") in their service territories. Neither PJM nor the Commission has provided sufficient justification for such an extensive collection of data on retail customers.

Accordingly, if the requested clarifications are not granted, the Commission should grant rehearing and either (1) exclude existing Large Loads from the Registry absent substantial record evidence supporting their inclusion, or (2) direct PJM to apply to Registry data the access limitations and protections described above, consistent with OA section 18.17.

[47] IRAS Filing at 22.

## VII. CONCLUSION

PJMICC and Steel Producers respectfully request that the Commission grant the clarifications set forth above, consistent with its holding in the October 9 Order, or, in the alternative, grant rehearing as set forth in Section VI.

Respectfully submitted,


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Dated: November 9, 2026

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served, via first-class mail, electronic transmission, or hand-delivery, the foregoing upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 9th day of November, 2026.

*/s/ Susan E. Bruce*

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