



## I. ANSWER

CEG's opposition to PJM's proposal is based on unsupported and speculative assertions about the potential allegedly discriminatory behavior of Transmission Owners related to co-located load issues.

CEG proposes three options. The CEG options are to reject PJM's new definition, to implement additional compliance measures to prevent discrimination against large load projects not sponsored by Transmission Owners, or to clarify that the Commission will not accept discrimination against large load projects not favored by Transmission Owners.

CEG has not demonstrated any actual issues with PJM's proposed language. The Market Monitor supports PJM's use of the Point of Change in Ownership rather than Point of Interconnection because it is consistent with the physical meaning of co-location as defined in the December 18<sup>th</sup> Order (at P 164) and for the reasons stated by PJM.<sup>5</sup>

In the proposed revisions to the OATT, PJM defines co-located load including the Point of Change in Ownership language:

'Co-Located Load' shall mean a configuration that refers to end-use customer load that is physically connected to the facilities of an existing or planned Generating Facility on the Project Developer's side of the Point of Change in Ownership to the Transmission Provider's Transmission System.<sup>6</sup>

PJM directly addresses the Point of Ownership issue in a footnote (at 3 n.14):

This includes changing the term 'Point of Interconnection' in the Order on Show Cause definition to 'Point of Change in Ownership.' The Point of Change in Ownership, defined in Tariff, Part VIII, Subpart A, section 400, Definitions P, is the point at which 'the Project Developer's Interconnection Facilities connect to the Transmission Owner's Interconnection Facilities' and therefore is the appropriate demarcation point for Co-Located Load. The Point of Interconnection, defined in the same section of the Tariff, means

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<sup>5</sup> See Compliance Filing at 3.

<sup>6</sup> Compliance Filing, Attachment A.

the point where Interconnection Facilities connect to the Transmission System and thus could include connection to Transmission Owner Interconnection Facilities, which would not be appropriate.

The Market Monitor agrees that discrimination against projects not owned by Transmission Owners in favor of projects owned by Transmission Owners is not appropriate. The Market Monitor will investigate specific allegations of discriminatory behavior in the interconnection process.

## II. MOTION FOR LEAVE TO ANSWER

The Commission's Rules of Practice and Procedure, 18 CFR § 385.213(a)(2), do not permit answers to protests, answers, or requests for rehearing unless otherwise ordered by the decisional authority. The Commission has made exceptions, however, where an answer clarifies the issues or assists in creating a complete record.<sup>7</sup> In this answer, the Market Monitor provides the Commission with information useful to the Commission's decision making process and which provides a more complete record. Accordingly, the Market Monitor respectfully requests that this answer be permitted.

## III. CONCLUSION

The Market Monitor respectfully requests that the Commission afford due consideration to this answer as the Commission resolves the issues raised in this proceeding.

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<sup>7</sup> See, e.g., *PJM Interconnection, L.L.C.*, 119 FERC ¶61,318 at P 36 (2007) (accepted answer to answer that "provided information that assisted ... decision-making process"); *California Independent System Operator Corporation*, 110 FERC ¶ 61,007 (2005) (answer to answer permitted to assist Commission in decision-making process); *New Power Company v. PJM Interconnection, L.L.C.*, 98 FERC ¶ 61,208 (2002) (answer accepted to provide new factual and legal material to assist the Commission in decision-making process); *N.Y. Independent System Operator, Inc.*, 121 FERC ¶61,112 at P 4 (2007) (answer to protest accepted because it provided information that assisted the Commission in its decision-making process).

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Respectfully submitted,



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Dated: February 25, 2026

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Eagleville, Pennsylvania,  
this 25<sup>th</sup> day of February, 2026.



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