



The Commission definition of co-located load does not define co-located load as load that is isolated from PJM markets or that relies on removing a PJM capacity resource from the PJM markets.<sup>5</sup>

Co-Located Load:

“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.

Co-located load defines the physical and electrical location of the load and generation but not how the load and generation are treated in the market. Co-located load, as defined by the Commission and adopted by PJM, is fully consistent with the generation being in the capacity market and the load being treated like all other load. The Commission did not address the fundamental reliability issues that are raised by the addition of, and the expected addition of, large amounts of data center load. Neither the Commission order nor the PJM tariff filing should be assumed to address those issues unless the approach is clearly stated. Removal of existing capacity from the PJM markets in order to serve data center load would have a massive impact on the cost of power to all other customers in the PJM markets. Such an approach is completely inconsistent with affordability.

There are a significant issues not addressed in PJM’s filing. These are some examples. PJM’s filing does not address how it will ensure that the transmission system is not built to serve the entire gross output of a co-located generator or the entire gross load of a co-located load. In the absence of such details, the asserted savings from less than NITS service is likely to be illusory. PJM does not explain how it will or could prevent unexpected injections onto the grid from a co-located generator when the load drops suddenly. PJM does not explain how it will plan the transmission system to serve the load when the generator trips or is

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<sup>5</sup> See January 20<sup>th</sup> Filing, Attachment A & B, proposed definition of “Co-Located Load.”

unavailable as a result of an outage. The issues raised should be explicitly addressed in this filing or as soon as is practical.

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

Respectfully submitted,



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Dated: February 10, 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 10<sup>th</sup> day of February, 2026.



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