



December 22, 2025

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Tentative Order on Interconnection and Tariffs for Large Load Customers (Docket M-2025-3054271)

The Shapiro’s Administration appreciates the opportunity to submit comments to the Pennsylvania Public Utility Commission, as the Commission considers new guidance governing the interconnection and tariffs for data center-driven large load additions occurring with increasing frequency throughout the Commonwealth.¹ Given the pace of development, and the scale at which development is occurring, the timing of this effort is both timely and urgent. The Shapiro Administration has supported the development of data centers, recognizing that there is a battle for global supremacy over artificial intelligence that presents real national security imperatives for the United States.

The Administration has cut red tape and invested in energy generation, site readiness, and workforce development, making Pennsylvania an increasingly attractive home for the data centers that make AI possible. But as we continue to encourage responsible data center development, the Administration also believes that it is critical that we focus on keeping energy prices affordable and our grid secure. The Shapiro Administration is eager to continue to partner with technology companies that engage with and provide benefits to local communities, that protect the environment and prevent costs from being passed on to other ratepayers. The Commission’s Tentative Order addresses many of these priorities, and the Administration commends the Commission for its work, while encouraging it to go further to ensure that uniform rules that will protect ratepayers are established through this process.

Recent developments in the energy landscape are without precedent, and events—even since the Tentative Order was issued—have evolved rapidly. Not only is the overall magnitude of load increase historic, but the nature of these large loads is unique. Large data center loads are often majority comprised of power electronic loads (PEL) as opposed to the mechanical loads (e.g. electric motors) traditionally seen in industrial and commercial interconnections. These large PELs can rapidly increase and decrease electricity demand, resulting in challenging reliability situations for grid operators to manage. The demand magnitude and unique nature of large load interconnections will require significant system expansion investments that should be borne by

¹ Bloomberg New Energy Finance, “*AI and the Power Grid: Where the Rubber Meets the Road*”, December 1, 2025 (accessed 12/16/25) <https://about.bnef.com/insights/clean-energy/ai-and-the-power-grid-where-the-rubber-meets-the-road/>

large loads that triggered these costs. Interconnection of these large loads must not sacrifice electricity reliability or electric bill affordability for the rest of Pennsylvania’s electricity consumers. Given the rapid developments in the energy space in recent months, the Shapiro Administration encourages the Commission to strengthen the consumer protections contained in the proposed Tentative Order.

The model tariff represents a voluntary approach, with significant discretion provided to each jurisdictional electric distribution company (EDC). The Shapiro Administration commends the Commission for acting quickly to provide guidance to EDCs as large load interconnection requests proliferate. Under different circumstances, this voluntary approach might be sufficient. However, the Shapiro Administration believes that recent dramatic shifts in the electricity sector require stronger action to protect reliability and affordability for consumers. The Administration encourages the Commission to finalize a strengthened model tariff, then move to adopt parallel regulatory measures which to create consistency across Pennsylvania EDCs with respect to 1) ensuring reliability, and 2) protecting consumers from undue costs as large data center-driven loads interconnect to the grid.²

Reliability

Taking these issues in turn, the Shapiro Administration encourages the Commission to provide a greater focus on the reliability impacts of large load interconnections. The North American Electric Reliability Corporation (NERC) is responsible for developing and enforcing reliability standards for the bulk power system (BPS). NERC generally does not regulate distribution system reliability, other than for critical infrastructure protection (under-frequency/voltage load shedding),³ and to promote coordination between transmission and distribution systems related to distributed energy resources and reliability impacts.⁴

In Pennsylvania, the Commission has jurisdiction over the reliability of the distribution system. NERC has raised serious concerns about the potential reliability impacts of large load interconnections. NERC registered entities, which include but are not limited to transmission

² In this regard, the Administration supports the Commission’s recent action to deliver a Notice of Proposed Rulemaking on modernizing the Commission’s electric interconnection regulations for both load and distributed energy resources at its March 26, 2026 public meeting (Docket M-2025-3059032) PA PUC, “PUC Votes to Advance Rulemaking to Modernize Electric Interconnection Regulations“, 12/18/2025, (accessed 12/19/2025)<https://www.puc.pa.gov/press-release/2025/puc-votes-to-advance-rulemaking-to-modernize-electric-interconnection-regulations-12182025> (accessed 12/19/2025)

³ NERC, “Frequently Asked Questions”, March 2023, (accessed 12/16/25) <https://www.nerc.com/globalassets/who-we-are/news/2023/march-2023-nerc-frequently-asked-questions-faq.pdf>

⁴ NERC, “Transmission and Distribution Coordination Strategies: SPIDERWG White Paper, October 2023, (accessed 12/16/25) https://www.nerc.com/globalassets/our-work/reports/white-papers/tanddcoordinationdocument_draft_white_paper.pdf

owners and distribution providers,^{5,6} may eventually need to meet NERC reliability standards for large loads.⁷ Unfortunately, these large load standards remain several years away from being finalized.⁸ In the interim, NERC has created a large load task force,⁹ issued a white paper,¹⁰ and published draft guidance as a bridge to standards.¹¹ Large data center loads in the Commonwealth are generally served through energy service agreements with EDCs. Given the reliability concerns raised by NERC and the Commission’s reliability jurisdiction, the Administration believes it would be appropriate for the Commission to provide stronger guidance to EDCs on how to maintain reliability while interconnecting large data center loads, and further that the Commission include NERC’s interim guidance, as appropriate, into its guidance to EDCs and regularly update its guidance to EDCs in order to align with evolving interim NERC guidance.

Appropriate MW Size Designation for Large Load Tariffs in Pennsylvania

The Commission’s Tentative Order found that large load customers should be defined as 50 megawatts (MW) individually or 100 MW in the aggregate. The Shapiro Administration is concerned that sole reliance on a MW size threshold to define a large load may be insufficient as it does not capture the system reliability risks related to interconnection and operation of the facility. Failure to adequately characterize these loads as part of the interconnection process could create reliability issues.

NERC defines “large loads” as:

⁵ For example, see NERC, “ERO Enterprise Registration Practice Guide: Distribution Provider “directly connected” determinations <https://www.nerc.com/globalassets/programs/registration/registration-documentation/ero-enterprise-registration-practice-guide-distribution-provider-directly-connected-determinations.pdf>

⁶ NERC defines “distribution providers” as entities that “Provides and operates the “wires” between the transmission system and the end-use customer. For those end-use customers who are served at transmission voltages, the Transmission Owner also serves as the Distribution Provider. Thus, the Distribution Provider is not defined by a specific voltage, but rather as performing the distribution function at any voltage.” See NERC’s Glossary at https://www.nerc.com/globalassets/standards/reliability-standards/glossary_of_terms.pdf

⁷ NERC suggests that certain large loads could potentially become NERC registered entities subject to reliability standards in NERC’s comments to FERC on the advanced notice of proposed rulemaking (ANOPR) on “Ensuring the Timely and Orderly Interconnection of Large Loads”, (accessed 12/16/25), https://www.nerc.com/globalassets/who-we-are/legal--regulatory/filings--orders/nerc-filings-to-ferc/2025/large_load_anopr_comments_final_digicert.pdf [Herein referred to as NERC ANOPR Comments]

⁸ Graphic extracted from NERC ANOPR Comments

⁹ NERC, Large Load Task Force Webpage, (accessed 12/16/25), <https://www.nerc.com/who-we-are/committees/reliability-and-security-technical-committee-rstc/subcommittees-working-groups-and-task-forces/large-loads-task-force-lltf>

¹⁰ NERC, “Characteristics and Risks of Emerging Large Loads: Large Loads Task Force White Paper”, July 2025, <https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/whitepaper-characteristics-and-risks-of-emerging-large-loads.pdf>, (accessed 12/19/2025) [Herein referred to as the NERC White Paper]

¹¹ NERC, “Preliminary Draft Reliability Guideline: Risk Mitigation for Emerging Large Loads”, predated May 2026, https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/draft_reliabilityguideline_riskmitigationforemerginglargeloads.pdf, (accessed 12/19/25), [Herein referred to as NERC Draft Guidelines]

“Any commercial or industrial individual load facility or aggregation of load facilities at a single site behind one or more point(s) of interconnection that can pose reliability risks to the BPS due to its demand, operational characteristics, or other factors. Examples include, but are not limited to, data centers, cryptocurrency mining facilities, hydrogen electrolyzers, manufacturing facilities, and arc furnaces.”¹²

The Commission should consider modifying its definition of large loads to consider not just a size threshold, but also whether the facility has certain specific high-risk operational characteristics that NERC has identified and mapped to specific system risks, and which the Commission should specify and enumerate. The Commission should include sufficient information to enable a developer to determine whether the proposed facility features those operational characteristics early in the planning process, and should further include information about “safe harbor” choices in facility design or operation that the Commission has judged would mitigate some or all system risks in order to exclude a facility from treatment as a “large load” on the basis of those operational characteristics. In addition to a MW peak demand threshold, NERC has identified these characteristics to include whether the load was subject to fast interconnection timelines, the demand profile, load predictability, ramp rates (in the operational horizon), load type (e.g., percent PEL), voltage sensitivity (e.g. ride-through settings), inaccurate dynamic models of the load, and internal segmentation.¹³

Deposits, Financial Security & Collateral from Large Load Customers

The Commission suggests financial security should be graduated based on the size of load, in amounts sufficient to cover the large load’s share of network upgrade costs that benefit the large load customer, reflecting a risk-based approach that allows for reductions/refunds over time, and incorporating credit worthiness and liquidity. The Shapiro Administration generally agrees with the Commission’s approach but encourages the Commission to maintain provisions that ensure collateral is both secure and sufficient.

Network Upgrades and Contributions in Aid of Construction (CIAC)

The Shapiro Administration agrees that the large load triggering customer should fully bear interconnection costs that solely benefit the interconnecting customer. The Commission proposes that large loads should make a CIAC for network upgrades that benefit the entire system if the large load-triggering customer receives more than half of the benefit of the upgrade. The Administration generally agrees with this concept but is concerned that the method for determining beneficiaries of network upgrades has not been specified. This is a contentious issue in regional *transmission* planning because some common methods for determining beneficiaries are not appropriate for all system violations. For example, PJM Interconnection’s solutions-based distribution factor (DFAX) method for informing regional transmission cost allocation was found to be appropriate for identifying beneficiaries when solving for thermal or voltage related reliability violations, but was found to be unjust and unreasonable for identifying beneficiaries

¹² NERC White Paper

¹³ NERC White Paper

when solving for stability or short-circuit related reliability concerns.¹⁴ The Commission should be more specific about the appropriate methods for determining beneficiaries based on the reliability issue triggering the network upgrade.

The Tentative Order suggests that ratepayers could be required to contribute to cost recovery of network upgrades triggered by large load customer interconnection when the large load customer captures less than 50% of the benefits. The Commission should provide additional guidance on cost allocation methodology when ratepayer funding is used to recover network upgrade costs triggered by large load interconnection. The Commission should also address cost allocation methods when project beneficiaries extend beyond one EDC service territory. For example, it is conceivable that a large load interconnection to the 230 kV system would require a network upgrade that benefits customers within and beyond the EDC's retail service territory.

The Tentative Order does not explicitly state that CIACs are not included in the utility's rate base and therefore cannot be used to generate a rate of return. It is common practice not to include CIACs in a utility's rate base (i.e., a reduction in rate base).¹⁵ In an abundance of caution, it should be made explicitly clear in the final order that CIACs should not be added to the utility's rate base.

The Shapiro Administration agrees that in addition to the required CIACs, there could be a voluntary CIAC—for network upgrades that benefit the system—and that this voluntary CIAC could be one of many criteria used to qualify for expedited load queue consideration and/or load interconnection. The Administration encourages the Commission to provide clearer regulatory guidance on expedited load queue and interconnection processes that ensure maintenance of reliability. Specifically, it is unclear how an expedited load interconnection track would work with the Commission's bi-annual network open season cluster study process.

Minimum Contract Terms

The Tentative Order recommends a minimum contract length of 5 years but declined to establish a specifically required contract term. The Shapiro Administration believes a 5-year minimum contract term is of potential value as a backstop. However, as a general matter, contract terms should be dictated by the utility's cost recovery needs to fully serve the large load customer (i.e., cost causation) and avoid cost-shifting and cross-subsidization from other ratepayers. It is these principles—cost causation and avoidance of cost shifting or cross subsidization—that should serve as the regulatory standard. Specifically, the Administration recommends the Commission set stronger regulatory requirements that direct utilities to establish minimum contracts terms that

¹⁴ See *Public Service Electric and Gas Company v. FERC*, No. 19-1091 (D.C. Cir. March 2, 2021), <https://ferc.gov/sites/default/files/2021-03/TransportRoomDC19-1091PSEandG-Opinion.pdf>, (accessed 12/19/25), and *Consolidated Edison Company of New York v. FERC*, No. 15-1183 (D.C. Cir. August 9, 2022)

¹⁵ CIAC's represent non-investor provided capital that may be recorded on a utility's balance sheet as a liability that is amortized over the life of the asset. See for example, the Financial Accounting Institute's CIAC definition at <https://financialaccounting.com/glossary.pdf> (accessed 12/19/25)

ensure full recovery of utility costs to serve the large load customer to prevent cost shifting to other customers.

Interconnection Studies and Agreements

The Tentative Order encourages utilities to meet with stakeholders to discuss process and implications of large load interconnections, including but not limited to the bar for entry into EDC queues, queue management, interconnection requirements, and load ramping requirements. The Tentative also proposes that EDCs should make a good faith effort to implement reasonable improvements. The Administration believes that these voluntary approaches offer too much flexibility with an EDC-by-EDC determination of important details, because this process is time consuming, balkanizing, and does not provide sufficient guidance on reliability. If EDCs are competing to attract large loads, this flexibility could result in a “race-to-the-bottom” that could sacrifice grid reliability and affordability for consumers. The Commission should set minimum standards for interconnection studies and agreements that will ensure maintenance of system reliability and consumer protection.

NERC has identified near-term, high-priority risks related to large load interconnection to include:¹⁶

- Long-term planning for resource adequacy - to ensure sufficient generation and transmission is available to serve the new large loads
- Operations and balancing – to ensure there are sufficient operating reserves to balance load variability and fast ramp rates that may negatively impact the stability of system voltage and frequency.
- Power system stability – upfront identification of system stability risks – especially related to ride-through, voltage and angular stability, and oscillations - to inform mitigation measures.

Currently, most of these risks are operationally managed by PJM Interconnection, but PJM cannot do its job without better information and coordination with the state jurisdictional utility with large load interconnection responsibility. Enhanced coordination between large retail loads and bulk power system operators is an important step to avoiding reliability risks. NERC’s level 2 information request alert,¹⁷ with 5 recommendations, a list of specific questions, and a data submission worksheet¹⁸ provides guidance and a format for collecting this information.

At minimum, the Commission should encourage jurisdictional EDCs to comply with NERC’s level 2 alert recommendations, require similar data submission requirements to the Commission,

¹⁶ *NERC White Paper*

¹⁷ NERC, “Industry Recommendation: Large Load Interconnection, Study, Commissioning, and Operations”, initial distribution September 9, 2025, <https://www.nerc.com/globalassets/programs/bpsa/alerts/2025/nerc-alert-level-2--large-loads.pdf> (accessed 12/19/25), [*Herein referred to as NERC Level 2 Alert*]

¹⁸ NERC Level 2 Alert data submission worksheet, <https://www.nerc.com/globalassets/programs/bpsa/alerts/2025/data-submission-worksheet-large-load-alert-2.xlsx> (accessed 12/19/25)

regularly monitor EDC compliance with NERC's recommended actions and guidelines, and/or develop similar requirements for PA EDCs that are not NERC registered entities.¹⁹ Beyond this minimum, NERC's draft reliability guidelines recommend that transmission owners should establish large loads interconnection requirements with clear design and performance criteria that address identified risks including: voltage and frequency ride-through, protection settings, stability, operational ramping limits, power quality, communication, under-voltage/frequency and manual load shedding participation, oscillation mitigation, and high-frequency data monitoring.²⁰ For the benefit of reliability, and in the interim while NERC is developing its regulatory approach, the Commission should track NERC's interim actions and establish reliability requirements that reflect NERC's guidance.

The Shapiro Administration believes the Commission should provide more guidance on interconnection study requirements, especially in light of NERC's large load risk observations. NERC has recommended development of a framework for classifying large loads, and development of large load models that can simulate risks associated with each category of large load classification.²¹ NERC has also developed draft guidelines that include detailed guidance on interconnection studies that include minimum data collection requirements, readiness criteria, detailed study requirements (steady-state, dynamic, and short-circuit models, as well as triggers for special assessments). While all of these recommendations may not be suitable for EDCs, it is clear that NERC has identified critical gaps it is aiming to fill in the existing interconnection study regime. The Commission should begin an investigation of EDC system interconnection data collection, modeling, and analysis to determine if required enhancements should be made to better assess and understand the potential impacts of large load interconnections.

The Shapiro Administration is supportive of expedited interconnection options, particularly for large loads committed to bringing their own generation and committed to self-construction of infrastructure upgrades. However, the Commission should provide more guidance on how the network open season cluster studies will be conducted, including but not limited to phases of study, applicant modification and study retooling opportunities, determination of network upgrade beneficiaries, EDC coordination with the transmission owners and transmission operators, etc. The implementation requirements for the 6-month timeline for semi-annual load interconnection cluster studies are unclear and could create conflicts with an expedited load interconnection track unless the timelines and parameters of each is given careful consideration. Similar proposals, such as the joint proposal made by four governors, including Governor Shapiro, as part of PJM's Critical Issue Fast Path process, include mechanisms to expedite new generation projects while minimizing potential disruption to projects in existing generation queue cluster studies. The Administration encourages the Commission to adopt an expediting

¹⁹ As of December 3, 2025, Duquesne Light, PECO, PPL, and First Energy Pennsylvania Electric Company are NERC registered transmission owners and distribution providers, among other potential registration categories https://www.nerc.com/globalassets/programs/registration/compliance-registry-files/nerc_compliance_registry_matrix_excel.xlsx

²⁰ NERC Draft Guidelines

²¹ NERC White Paper

mechanism that would similarly allow for an expedited load interconnection study track without creating conflicts with simultaneous load interconnection cluster studies.

Minimum Demand Charges

The Shapiro Administration agrees with the application of demand charges to large loads, as these charges are meant to recover costs associated with meeting peak usage and to incent shifting demand to lower cost periods. The Tentative Order suggests a minimum monthly demand charge of 80% of contracted demand taken at the single highest 15-minute integrated kW peak, which can be no less than the greater of either 80% of contract capacity for the contract term, or 80% of the highest monthly billing demand over the last 11 months. The Administration appreciates the establishment of these minimums but encourages the Commission to further specify that demand charges reflect system peak periods (e.g., seasonal, on/off peak periods, time-of-use) to incentivize load shifting, and that these peak periods be reevaluated regularly to align with evolving system conditions.

In addition to demand charges, the Shapiro Administration believes the Commission should provide more guidance on tracking and allocating bulk power system costs attributed to large load interconnection and operation. For example, large PEL loads can have unprecedented ramp rates that impact frequency/voltage regulation, which will require increased ancillary service procurement (e.g., regulation up/down). Ancillary service (e.g., synchronized reserves, regulation and frequency response service, etc.) cost allocation mechanisms for large loads should be implemented to ensure large loads cover their cost of service without shifting costs to other ratepayers. Similarly, beyond interconnection-triggered large load network upgrades, these large loads are also triggering the need for historic investments in PJM regional transmission plan expansion, with costs ultimately recovered from load. The Commission should require utilities to track local and regional transmission enhancement costs triggered by large load interconnection and allocate those costs to large loads.

Exit or Early Contract Termination Fees

The Tentative Order suggests a 42- or 48-month period for large load customers to notify the EDC of their intent to reduce contracted capacity. The Shapiro Administration agrees that the 48-month period that aligns with the PJM load forecast is preferable. For early exit/termination fees, the Commission proposes a variety of options generally reliant on completing the initial contract term, providing notice, and whether contracted capacity is reduced by more or less than 20%. The Administration believes that the initial contract term should ensure full recovery of utility fixed costs to serve the large load. If the large load chooses to exit or terminate before the completion of the initial term, the exit fee should be calculated on a case-by-case basis and should allow the utility to fully recover its planned fixed costs of serving the contracted capacity. In other words, the utility is making a long-term infrastructure commitment to serve the large load, assuming the load operates over a term that allows the utility to recover its costs with the specified rate. Contract terms and exit/early termination fees should allow for full recovery of these costs and should prevent stranded costs to serve large loads from being shifted to other

ratepayers. Finally, the Administration agrees that the utility could attempt to mitigate the exit/early termination fee by assigning the stranded capacity to another large load and should prohibit large loads from assigning obligations without the utility's consent.

Universal Service Cost Allocation

The Tentative Order proposes to require large load customers to contribute to utility hardship funds annually,²² with the minimum amount based on the customer's peak demand. The Commission seeks comment on whether the large load customers should also contribute the utility's low-income program or other programs. The Shapiro Administration believes large loads should contribute to universal service fund's customer assistance programs (CAP) to offset the burden on ratepayers to support program costs. Utility hardship funds are capitalized through voluntary, public utility and shareholder, and special contributions that benefit residential customers through grants.²³

The Shapiro Administration strongly believes the CAP programs are more appropriate than the hardship fund based on the greater reach of the former program. For example, hardship fund grants covered only 8,269 number of electric customers in 2022-2023, whereas CAP programs covered 317,627 electric customers in 2023.²⁴ The Administration also believes the fixed annual dollar amounts alone are not sufficient. Rather, the large load customers should also contribute monthly to the CAP program based on volumetric throughput (i.e., per kWh electricity consumed). The CAP rate for large loads should be calculated, and periodically adjusted, to offset or eliminate residential customer contributions to CAP program funding while increasing or holding steady the level of service provided by the CAP program.

Reporting Requirements

The Shapiro Administration supports the Commission's proposal that EDCs provide certain large load information to the commission on a semi-annual basis, with the information being subject to confidentiality protections but accessible to consumer advocates, enforcement bureaus, etc. This information includes but is not limited to: number of executed energy service agreements, number/amount of termination fees and early exit notices, large load interconnection development stages, aggregate investment made by EDCs to serve large loads, etc. In addition, the Commission proposes an annual reporting requirement with high level data on large load customer revenue actuals vs forecasts, distribution system impacts, curtailment enforcement, and equity and outreach efforts. The Administration believes collecting and tracking these data are

²² Industrial customer support of residential CAP programs is consistent with the Commission's 2019 policy statement that asserts no rate class will routinely be exempt from universal service or CAP obligations. See PA PUC "2019 Amendments to the Policy Statement on Customer Assistance Program", 52 PA Code §§ 69.261-69.267, located at <https://www.puc.pa.gov/pcdocs/1660711.pdf> (accessed 12/19/2025)

²³ PA PUC, "Universal Service Programs and Collections Performance: 2023 Report", September 2024, https://www.puc.pa.gov/media/3433/2023_universal_service_report-final_rev041525.pdf, (accessed 12/22/25), [herein referred to as *PUC 2023 Universal Service Report*]

²⁴ PUC 2023 Universal Service Report

critical to monitor and further notes the importance of collecting certain specific information relevant for system reliability, such as ride-through capabilities, expected load per-minute ramp rates, and the size and ramping capabilities of anticipated backup generation and storage systems.

The Shapiro Administration commends the Commission for initiating this proceeding. The scale and pace of large load interconnection requests is rapidly evolving, as is our understanding of the potential impacts on reliability of the power system and affordability for electric ratepayers. We recognize the reliability concerns expressed by NERC, related to large load interconnection. In addition, we are increasingly concerned about the affordability and reliability impacts of large loads, as represented by skyrocketing PJM capacity market prices that failed to achieve resource adequacy reliability requirements,²⁵ and historic proposed transmission expansion costs primarily to serve these large loads.²⁶ The Administration urges the Commission to strengthen its approach on reliability and affordability to reflect the urgency of developments in the energy landscape. Further, the Administration stands ready to continue to engage with and support the Commission given the significant reliability and affordability challenges developing before us.

²⁵ See PJM Base Residual Auction 2027-2028 results that were over 6 GW short in meeting PJM's Reliability Requirement, <https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2027-2028/2027-2028-bra-report.pdf> (accessed 12/19/25)

²⁶ See the preliminary list of \$8- \$10 billion in transmission projects that could be approved as part of the 2025 PJM Regional Transmission Expansion Plan (RTEP), <https://insidelines.pjm.com/pjm-presents-preliminary-short-list-of-projects-for-2025-rtep-window-1/> (accessed 12/19/25)