September 18, 2025

Mr. Manu Asthana
President and CEO
PJM Interconnection
2750 Monroe Boulevard
Norristown, PA 19403

Dear Mr. Asthana,

America's energy landscape is experiencing a transformation as regions across the country see significant electricity demand growth to power industries of the future—from the artificial intelligence revolution to the re-shoring of advanced manufacturing. Fostering these projects and the energy infrastructure needed to serve them represents an extraordinary economic opportunity for our country. I also acknowledge there are challenges too. We must work together to seize this unique moment in the nation's history.

In that spirit, I write today to ask for your perspective on a critical but often overlooked tool: load forecasting. At a time when utilities forecast hundreds or thousands of megawatts of growth, improving forecasts by even a few percentage points in the right direction—up or down—can impact billions of dollars in investments and customer bills. Put simply, we cannot efficiently plan the electric generation and transmission needed to serve new customers if we don't forecast how much energy they will need as accurately as possible.

Our experience to date tells us that large loads, such as data centers, have characteristics that call for new and improved forecasting methods. Given the size and volume of new large *load* interconnection requests, I'm optimistic that utilities have an opportunity to apply similar criteria to those currently used to assess the commercial readiness of large projects in the *generator* interconnection queue. These objective criteria include observable milestones such as contracts, financial security deposits, and physical site control.[1]

I appreciate that many regions are still exploring and learning how best to improve their load forecasting tools for new large loads, while other regions have been integrating large loads for some time. To help me understand how the Commission might support these efforts and promote best practices across the country, I would like to open up a dialogue on the following questions:

[1] *See, e.g.*, post-Technical Conference comments submitted in FERC Docket No. AD24-11-000, including CEBA December 9 Post-Technical Conference Comments at 12-13; DCC December 9 Post-Technical Comments at 12; Google December 9 Post-Technical Conference Comments at 7-8; Wilson Energy Economics December 9 Post-Technical Conference Comments at 2, 7.

(1) How do you, the utilities in your footprint, and state regulators obtain information that verifies when and whether prospective large loads in your region will reach commercial operation?

(2) To what extent are prospective large load requests subject to consistent, objective screening criteria before they are included in the load forecast?

(3) How do you forecast how the actual electricity consumption of a large load will compare to its requested level of interconnection service?

(4) How do you coordinate with utilities at the regional or interregional level to share best practices on large load forecasting and ensure that large load interconnection requests are not double-counted?

I look forward to discussing these issues with you soon. The Commission stands ready to collaborate with you to ensure our country can fully realize the opportunities before us and ensure reliable, affordable, and abundant energy for all American families and businesses.

Sincerely,



David Rosner
Chairman
Federal Energy Regulatory Commission