UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C. *et al*.	)	Docket No. EL25-49-000
Large Loads Co-Located at Generating Facilities	)	Docket No. AD24-11-000
Constellation Energy Generation, LLC Complainant, v. PJM Interconnection, L.L.C. Respondent.	)	Docket No. EL25-49-000

COMMENTS OF THE

BUSINESS COUNCIL FOR SUSTAINABLE ENERGY

Pursuant to Rules 212 and 213 of the Federal Energy Regulatory Commission's (the "Commission" or "FERC") Rules of Practice and Procedure,[1] and pursuant to the Commission's February 21, 2025 *Notice of Institution of Section 206 Proceeding and Refund Effective Dates*[2] issued in the referenced proceedings, the Business Council for Sustainable Energy ("BCSE" or "Coalition") respectfully submits the following comments.

BCSE is a coalition of companies and trade associations from the energy efficiency, natural gas, and renewable energy sectors, and also includes independent electric power producers, investor-owned utilities, public power, industrial manufacturers, commercial end-users, and energy and environmental service companies. BCSE was founded in 1992, and advocates for policies at state, national and international levels that increase the use of

[1] 18 C.F.R. §§ 385.212, 385.213 (2024).

[2] *Notice of Institution of Section 206 Proceeding and Refund Effective Dates*, Docket Nos. EL25-49-000, AD24-11-000, EL25-20-000 (consolidated) (issued February 21, 2025).

commercially-available clean energy technologies, products and services. The coalition's diverse business membership is united around realizing a vibrant and competitive U.S. economy and the creation of a secure, affordable and sustainable energy future for the country.[3]

BCSE supports FERC taking action as soon as is practicable to address the issues related to the co-location of large loads and encourages FERC and PJM to consider the specific issues in this context of energy reliability, resource adequacy, implications for energy costs, as well as infrastructure and transmission planning.

I. SUMMARY

BCSE recognizes that co-location load arrangements are becoming increasingly common in PJM and this occurrence raises various planning, cost and market design issues. However, meeting this new load quickly and affordably is critical. Load growth is being driven by several factors, including expansion of data centers, artificial intelligence, and domestic manufacturing reasons – all of which are important to national security and the modernization of the U.S. energy system. There are supply side and demand side solutions available to address this load growth, and updated market rules are needed that can support this new load. The Commission should work as quickly as possible to provide direction, and resolve issues related to serving large loads.

In reviewing the various FERC issues considered as part of the November 1, 2024 Technical Conference and the Post-Technical Conference Comment submissions, BCSE provides an important resource for the Commission's consideration, *Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems*, published

[3] More information about BCSE is available at: www.bcse.org. As BCSE is a diverse coalition, not all BCSE members endorse or take positions on the issues included in these comments. The comments contained in this filing represent the position of BCSE as an organization, but not necessarily the view of any particular member with respect to any specific issue.

in February 2025 by Duke University's Nicholas Institute for Energy, Environment & Sustainability.

II. BCSE PERSPECTIVES

BCSE is a diverse coalition of organizations from all parts of the energy industry. While individual BCSE members have filed comments in this proceeding reflecting specific perspectives, BCSE offers the following comments in response to the Commission's Show Cause order:

- BCSE appreciates the consideration of the broad set of issues related to load growth and co-location of large loads into the U.S. energy system. BCSE's *2025 Sustainable Energy in America Factbook*[4] provides data on load growth in 2024 in PJM and ERCOT specifically, and contrasts this data with trends in electricity demand over the past several decades.
- BCSE recognizes that load growth of all sizes is being driven by several factors, including expansion of data centers, artificial intelligence, and domestic manufacturing – all of which are important to national security, economic competitiveness and the modernization of the U.S. energy system.
- There are supply-side and demand-side energy solutions available to meet this new demand. Critical to making these solutions available and to lowering costs is the need to update the relevant market rules, and to make these updates as quickly as possible.
- FERC should work as quickly as possible to provide direction and resolve issues related to large loads.

[4] Business Council for Sustainable Energy, BloombergNEF, 2025 Sustainable Energy in America Factbook, February 2025, www.bcse.org/factbook

- In considering updates to market rules, FERC should note the following resource:
    - *Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems*,[5] published in February 2025 by Duke University's Nicholas Institute for Energy, Environment & Sustainability.

V. CONCLUSION

BCSE thanks the Commission for its consideration of these important issues and requests that the Commission consider these comments in the development of its decisions on co-location of large loads.

Respectfully submitted,

/s/

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[5] Duke University's Nicholas Institute for Energy, Environment & Sustainability, *Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads*, February 2025, www.nicholasinstitute.duke.edu/publications

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this pleading has been served this day upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC this 23h day of April, 2025.

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