UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Independent Market Monitor for PJM	)	
	)	Docket No. EL26-30-000
v.	)	
	)	
PJM Interconnection, L.L.C	)	

COMMENTS OF THE JOINT CONSUMER ADVOCATES[1]

I. INTRODUCTION

Pursuant to Rule 206(f) of the Federal Energy Regulatory Commission (Commission or FERC) Rules of Practice and Procedure,[2] the following intervenors in this docket, collectively the Joint Consumer Advocates, submit these comments in support of the Complaint of the Independent Market Monitor for PJM ("IMM") filed with FERC on November 25, 2025[3]:

- Pennsylvania Office of Consumer Advocate (PA OCA),[4]
- People of the State of Illinois by the Office of the Illinois Attorney General (IL OAG),[5]
- Maryland Office of People's Counsel (MPC),[6]

[1] The Joint Consumer Advocates include the Pennsylvania Office of Consumer Advocate, People of the State of Illinois by the Office of the Illinois Attorney General, Maryland Office of People's Counsel, Delaware Division of the Public Advocate, Office of Ohio Consumers' Counsel, and Illinois Citizens Utility Board.
[2] 18 C.F.R. § 385.206(f).
[3] *Independent Market Monitor for PJM v. PJM Interconnection L.L.C.*, Docket No. EL26-30-000 (filed Nov. 25, 2025), (Complaint or IMM Complaint).
[4] The PA OCA has moved to intervene in this proceeding. *See* (doc-less) Motion to Intervene of the Pennsylvania Office of Consumer Advocate, Docket No. EL26-30-000 (filed Dec. 11, 2025) (PA OCA Intervention). The PA OCA represents the interests of Pennsylvania's utility consumers before the Commission. *See* 71 P.S. § 309-4 (outlining powers of Consumer Advocate to represent Pennsylvania's utility consumers in FERC proceedings and federal courts); PA OCA Intervention.
[5] The IL OAG has moved to intervene in this proceeding. *See* (doc-less) Motion to Intervene of the Illinois Attorney General's Office, Docket No. EL26-30-000 (filed Nov. 26, 2025) (IL OAG Intervention). The IL OAG represents the People of the State of Illinois[5] and their interest in receiving reliable electric services at the least possible cost. *See* 15 ILCS 205/6.5(c), (d); IL OAG Intervention.
[6] MPC has moved to intervene in this proceeding. See (doc-less) Motion to Intervene of the Maryland Office of People's Counsel. Docket No. EL26-30-000 (filed Dec. 12, 2025).

- Delaware Division of the Public Advocate (DE DPA),[7]
- Office of the Ohio Consumers' Counsel (OCC),[8] and
- Illinois Citizens Utility Board (CUB).[9]

In the Complaint, the IMM requests "that the Commission rule that PJM has the authority to add large new data center loads only when they can be served reliably as defined both by transmission and capacity adequacy."[10]

The IMM Complaint is timely and necessary given the surge within the PJM region of large loads attributable to data centers and artificial intelligence (AI). The magnitude of additional load from data center and AI consumers enabled by an undisciplined interconnection process to the PJM grid will impact grid reliability for existing consumers, has been a leading contributor to an expensive capacity market, and has imposed costs for transmission expansion on all customers in the region. PJM's primary job is to ensure grid reliability for its 67 million electricity users. Aside from fulfilling its fundamental role and obligation of ensuring grid reliability and administering efficient energy and capacity markets, PJM serves no purpose in pursuing the policy aim of continued proliferation of data centers and AI within the region if it conflicts with PJM's ability to meet its priority obligations. PJM can and must say "no" to the undisciplined interconnection of data center and AI large loads to the PJM transmission system to protect grid

[7] DE DPA has moved to intervene in this proceeding. *See* (doc-less) Motion to Intervene of the Delaware Division of the Public Advocate. Docket EL26-30-000 (filed Dec. 15, 2025). DE DPA represents the interests of Delaware's utility consumers, particularly residential and small commercial consumers, and has authority to appear on behalf of the interests of Delaware consumers before "federal administrative and regulatory agencies and commission in matters involving rates, services, and practices of public utilities." 29 *Del. C.* § 8716(e)(2), (3).

[8] Under Ohio R.C. Chapter 4911, the OCC is the authorized representative of approximately 4.5 million Ohio residential utility consumers. OCC has moved to intervene in this proceeding. See (doc-less) Motion to Intervene of the Office of the Ohio Consumers' Counsel. Docket EL26-30-000 (filed Dec. 11, 2025).

[9] CUB is an Illinois-based statewide organization of residential ratepayers. The Citizens Utility Board Act, the Illinois statute that created and governs CUB, states that CUB shall "Represent and protect the interests of the residential utility consumers of this State." CUB has moved to intervene in this proceeding. See (doc-less) Motion to Intervene of the Illinois Citizens Utility Board. Docket EL26-30-000 (filed Dec. 12, 2025).

[10] IMM Complaint, at p. 3.

reliability unless and until there exists sufficient resource adequacy, as defined by existing reliability benchmarks, to serve that load. An unreliable grid counterproductively harms the interests of all PJM ratepayers to be reliably served and to pay just and reasonable rates for reliable service. The IMM Complaint puts reliability front and center before the Commission. By granting the requested relief, FERC would force PJM to reassert the top priority for which it was created: to reliably provide electricity to its 67 million electricity users. For these and the more specific reasons outlined below, the Commission should grant the relief requested in the IMM's Complaint.

II. COMMENTS

A. PJM can and must require and maintain the disciplined interconnections of large loads to transmission service to ensure the overall reliability of the regional grid; PJM's failure to exercise its existing authority to do this either has or will result in existing consumers paying unjust and unreasonable prices for less reliable service quality.

In its role as Independent Market Monitor, the PJM IMM has extensively studied the results of the most recent PJM base residual auctions (BRA) and found that large loads have overwhelmingly contributed to the unprecedented spike in capacity prices paid by PJM ratepayers. The IMM Complaint correctly alleges that:

> Data center load growth is the primary reason for recent and expected capacity market conditions, including total forecast load growth, the tight supply and demand balance, and high prices. But for data center growth, both actual and forecast, the capacity market would not have seen the same tight supply demand conditions, the same high prices observed in the 2025/2026 BRA and the 2026/2027 BRA, and the currently expected tight supply conditions and high prices for subsequent capacity auctions."[11]

The unprecedented spike in demand due to AI data centers has challenged the structure of a market based on incremental load growth and resulted in substantial increases in both capacity and energy prices. In PJM, capacity prices effective June 1, 2025, skyrocketed by approximately 833%

[11] IMM Complaint, at pp. 3-4 (footnotes omitted).

increasing from $28.92 per MW-day to $269.92 per MW-day,[12] and further increased to $329.17 per MW-day for 2026-2027.[13] Overall total wholesale electricity prices in PJM increased by more than 40% compared to the third quarter of 2024.[14]

The Joint Consumer Advocates represent the end-users or ratepayers who are paying for this extraordinary data center load, at a time when other affordability concerns are increasingly squeezing the pocketbooks of ratepayers. Stopgap measures have been to no avail and, more importantly, provide no clear solution for the future.

Two options to address the current challenges are presented by the IMM Complaint. Either (1) PJM must implement its governance documents[15] that provide existing authority for PJM to discipline the process for interconnection to the transmission grid to ensure resource adequacy and adequate operating reserves; or (2) PJM's governance documents fail to clearly establish detailed terms and conditions of disciplined transmission service interconnection to ensure resource adequacy and adequate operating reserves.[16] Under either scenario presented in the Complaint,

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[12] PJM, 2025/2026 Base Residual Auction Report, at p. 3 (July 30, 2024), https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.ashx.

[13] PJM, 2026/2027 Base Residual Auction Report, at p. 3 (July 22, 2025), https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2026-2027/2026-2027-bra-report.pdf.

[14] Monitoring Analytics, State of the Market Report for PJM: January through September, at pp. 17-19 (Nov. 13, 2025), https://www.monitoringanalytics.com/reports/PJM_State_of_the_Market/2025/2025q3-som-pjm.pdf.

[15] These governing documents include the PJM Open Access Transmission Tariff ("OATT"), the PJM Operating Agreement ("OA"), and the PJM Reliability Assurance Agreement ("RAA"). *See Governing Documents*, PJM, https://www.pjm.com/library/governing-documents.aspx (last visited Dec. 13, 2025) (listing PJM's governing documents).

[16] *See* IMM Complaint, at pp. 1-2 & nn. 3-7 (first citing OA Schedule 6, OATT Attachment DD, RAA; then citing OA Schedule 6 § 1.1; and then citing *Reg'l Transmission Orgs.*, Order No. 2000, 65 Fed. Reg. 809, 810, 875, 955 (January 6, 2000), *order on reh'g*, Order No. 2000-A, 90 FERC ¶ 61,201 (2000), *aff'd sub nom. Pub. Util. Dist. No. 1 of Snohomish County, Washington v. FERC,* 272 F.3d 607 (D.C. Cir. 2001)); *see also* IMM Complaint, at pp. 8-10 & nn. 17-20 (first citing OA § 10.4(iv) ("The Office of the Interconnection … shall…[c]omply with NERC, and Applicable Regional Entity operation and planning standards, principles and guidelines…"); then citing OATT § 1 (Definitions O-P-Q, "PJM Control Area") (PJM is recognized by NERC as responsible for the PJM Control Area); then citing RAA Art. 1 (Control Area) (purpose of Control Area is to provide sufficient generating capacity to maintain operating reserves in accordance with Good Utility Practice); then citing OA § 1 (Definitions G-H) (defining "Good Utility Practice" as "any of the practices, methods and acts engaged in or approved by a significant portion of the electric utility industry during the relevant time period, or any of the practices, methods and acts which, in the exercise of reasonable judgment in light of the facts known at the time the decision was made, could have been expected to accomplish the desired result at a reasonable cost consistent with good business practices, reliability, safety and expedition."); and then citing RAA Art. 1).

PJM's failure to clarify and enforce its existing authority and to protect reliable transmission service and resource adequacy within the region is unjust and unreasonable.[17]

PJM does not have an absolute obligation to permit the interconnection of large loads to the transmission system if the consequence of serving that load is the diminished reliability of wholesale service to existing users of the bulk power system (BPS). As the RTO, PJM has certain key tools available to it to ensure the continued reliability of the grid: (1) planning, (2) the authority to review and approve requests for new interconnections to the transmission grid,[18] (3) designing and administering the capacity market construct, including the reliability backstop mechanism, and (4) enforcing reliability criteria established by NERC or Reliability*First*.

PJM, as a balancing authority and transmission operator, must enforce reliability criteria on users of the BPS, including local utilities and load serving entities.[19] FERC's jurisdiction for establishing a reliability benchmark is well-settled.[20] The RAA requires PJM to "establish an acceptable level of capacity resources consistent with the principles and standards established by NERC, and, through its delegate responsible for PJM, Reliability*First*.[21] As stated by Asim Haque, vice president of state and member services for PJM, "PJM's most important job is maintaining grid reliability," and it is "committed to strengthening the reliability and long-term resilience of the grid under a wide range of extreme scenarios, including the severe winter weather we have recently seen in other parts of the country."[22] This most important job means that PJM must focus

[17] *See* IMM Complaint, at p. 11 (requesting specific relief).
[18] Order No. 2000 at 955 ("The Regional Transmission Organization must be the only provider of transmission service over the facilities under its control, and must be the sole administrator of its own Commission-approved open access transmission tariff. The Regional Transmission Organization must have the sole authority to receive, evaluate, and approve or deny all requests for transmission service. The Regional Transmission Organization must have the authority to review and approve requests for new interconnections.")
[19] 16 U.S.C. § 824o.
[20] *Planning Res. Adequacy Assessment Reliability Std.*, Order No. 747, 134 FERC ¶ 61,212, PP 20-26 (2011).
[21] *PJM Interconnection, L.L.C.*, 134 FERC ¶ 61,066, P 74 (2011) ("We will accept PJM's proposal to the extent that it is consistent with the RAA, but make clear that nothing in our acceptance should be construed as permitting PJM to violate the RAA.").
[22] Ariana Whitehair, West Virginia Executive, The Stability of the PJM Grid, May 31, 2023, https://wvexecutive.com/the-stability-of-the-pjm-grid/ (quoting Asim Haque).

on reliability and resource adequacy in all its operations, including when connecting large load customers.

Reliability*First* established the "one day in ten year" loss of load expectation principle (LOLE) for planning purposes within PJM beginning in 2011.[23] This is found in reliability standard, BAL-502-RF-03.[24] The importance of BAL-502-RF-03 for grid reliability planning purposes cannot be overstated. As FERC explained:

> If resources cannot meet load, or are insufficient to provide a reserve margin above expected load, then instability, uncontrolled separation or cascading failures can result from the unanticipated loss of a system element. If this situation occurs, reliable operation is not achieved due to resource inadequacy.[25]

While FERC has made clear that standard BAL-502-RF-03 does not impose a requirement for a user of the BPS to construct or otherwise invest in additional transmission, distribution, or generation resources or capacity,[26] PJM, as the RTO and balancing authority, can and must engage in proper planning and not permit a local utility's large load[27] to interconnect to the transmission system unless and until there exists sufficient resource adequacy, as defined by benchmark BAL-502-RF-03, to serve that load.

Order No. 2000 provided RTOs with the authority to review and approve requests for new interconnections to the transmission grid.[28] The flip side of the authority to approve is the authority to not approve. Without the authority to reject or postpone, the authority to approve is a mere rubber stamp, and PJM cannot protect the reliability of the power grid if it ignores this

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[23] Order No. 747, PP 31-34.
[24] https://www.nerc.com/globalassets/standards/reliability-standards/bal/bal-502-rf-03.pdf.
[25] Order No. 747, P 25.
[26] Order No. 747, P 26.
[27] Within PJM, large loads interconnect directly through local utilities. Local utilities, not large loads, are the direct users of the BPS.
[28] Order No. 2000, 65 Fed. Reg. at 955 ("The Regional Transmission Organization must be the only provider of transmission service over the facilities under its control, and must be the sole administrator of its own Commission-approved open access transmission tariff. The Regional Transmission Organization must have the sole authority to receive, evaluate, and approve or deny all requests for transmission service. The Regional Transmission Organization must have the authority to review and approve requests for new interconnections.")

responsibility. Rejecting or postponing the addition of a new large load would not impose a requirement on any user of the PJM system to invest in additional transmission, distribution, or generation resources or capacity, and, importantly, it would preserve the use of capacity resources that cleared in previous capacity auctions to provide reliable service to existing users. Thus, it must be within PJM's existing authority to ensure grid reliability by requiring and maintaining the disciplined interconnection of new load to the interstate transmission system.

Indeed, clearly only PJM has the authority to say "no" to the requests of local utilities to add large loads to the interstate multi-jurisdictional BPS administered by PJM.[29] A state's power ends at the local utility and does not consider consistently or comprehensively the impacts of the large load request on the reliability and resource adequacy of the larger PJM administered BPS.[30] If states cannot say no to the addition of large loads to the BPS sponsored by the local utility that have an adverse impact on the BPS, then PJM must be able to. Otherwise, there is an impermissible "gap" between the states and PJM. As the U.S. Supreme Court said in *EPSA*, "there is no regulatory 'no man's land'" in wholesale electricity markets.[31] Indeed, the answer cannot be that no entity

[29] Large loads interconnect directly through local utilities. Local utilities, not large loads, are the direct users of the BPS. A state (through its statutes, regulations, and public utility commission) has the authority to regulate the disciplined interconnection requests of large loads to the local utility distribution system to ensure resource adequacy at the state level. However, many states in the PJM region are restructured where the local distribution utility is not responsible for providing the electricity for new loads. These states rely on connection to the transmission system for the delivery of wholesale power to their electricity users and rely on PJM to provide resource adequacy when they are connected to the PJM transmission system. As explained in dicta in *Hughes v. Talen Energy Mktg.*, "Until relatively recently, most state energy markets were vertically integrated monopolies—*i.e.*, one entity, often a state utility, controlled electricity generation, transmission, and sale to retail consumers. Over the past few decades, many States, including Maryland, have deregulated their energy markets. In deregulated markets, the organizations that deliver electricity to retail consumers—often called "load serving entities" (LSEs)—purchase that electricity at wholesale from independent power generators. To ensure reliable transmission of electricity from independent generators to LSEs, FERC has charged nonprofit entities, called Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs), with managing certain segments of the electricity grid…RTOs and ISO administer a number of competitive wholesale auctions…[including]…a "capacity auction" to ensure the availability of an adequate supply of power at some point far in the future." 578 U.S. 150,154 (2016).

[30] *See supra* n. 29.

[31] *FERC v. Elec. Power Supply Ass'n*, 577 U.S. 260, 290 (2016)) (*EPSA*).

has jurisdiction to provide a qualified no to transmission interconnections to protect the reliability of the regional power system. PJM's providing a qualified "no" to the interconnecting local utility's request to add new large loads to the grid unless and until there exists sufficient transmission capacity and resource adequacy does not run afoul of state authority to regulate retail sales. As also said in *EPSA*, "FERC regulation does not run afoul of § 824(b)'s proscription [of FERC regulating retail sales] just because it affects – even substantially – the quantity or terms of retail sales."[32] The clarification of PJM's role in maintaining the reliability of the BPS sought in the Complaint does not prevent, and should not prevent, the state from enacting regulations on the interconnection of new large load customers to the local utility's distribution system.

Finally, PJM's capacity market must produce just and reasonable rates,[33] which means, in part, that it must function to maintain sufficient capacity to keep the system reliable. "FERC extensively regulates the structure of the PJM capacity auction to ensure that it efficiently balances supply and demand, producing a just and reasonable clearing price."[34] FERC previously found the PJM capacity market unjust and unreasonable because it maintained insufficient capacity to keep the system reliable.[35] PJM's capacity market is an administrative construct that was not designed to address this sudden surge of extraordinary, large loads attributable to data centers and AI.[36] The

[32] *Id.* at 262.
[33] 16 U.S.C. § 824d(a)-(b).
[34] *Hughes v. Talen Energy Mktg., LLC*, 578 U.S. 150, 157 (2016) (citing *FERC v. Elec. Power Supply Ass'n*, 577 U.S. 260, 268 (2016)).
[35] *See PJM Interconnection, L.L.C.*, 115 FERC ¶ 61,079 (2006) (PJM Capacity Market Order). As a replacement, FERC accepted a settlement proposal establishing the Reliability Pricing Model (RPM) for the procurement and pricing of unmet capacity obligations on a multi-year, forward basis. *See PJM Interconnection, L.L.C.*, 117 FERC ¶ 61,331 (2006) (2006 RPM Settlement Order).
[36] In an ongoing Illinois Commerce Commission docket reviewing the connection of large loads to the Commonwealth Edison distribution system, the utility's witness testified that large load interconnection requests accounted for only 80 MW in 2019, but jumped to 652 MW in 2022, to 3,931 MW in 2024, and to an astonishing 8,272 MW in 2025. The average large load demand over the last twelve months equals 700 MW, which is roughly equivalent to the demand of 1,400 big box retail stores and matches the demand of a small city. *See Commonwealth Edison Company, Filing proposing changes to new service requests for large demand project applicants or customers (tariffs filed June 23, 2025)*, Ill.C.C. Docket No. 25-0677 (cons.), ComEd Ex. 1.0 at 6, https://icc.illinois.gov/docket/P2025-0677/documents/369550. *See also* Eliza Martin& Ari Peskoe, Extracting Profits from the Public: How Utility Ratepayers Are Paying for Big Tech's Power, Environmental and Energy Law Program, Harvard Law School, 4 &n.3

magnitude of data center and AI demand enabled by an undisciplined interconnection process to the PJM grid will impact grid reliability for existing consumers and has created an expensive capacity market. PJM needs to utilize its tools of prudent planning, enforcement of reliability standards, and disciplined interconnection of large loads and extraordinary demand if PJM's capacity market are to return to just and reasonable levels for existing consumers. PJM's capacity market may need to be evaluated for potential design improvements to effectively implement its reliability and resource adequacy obligations.

B. PJM has improperly oriented its policy discussions to explore reactive solutions to the large load additions after they occur, entertaining solutions that would involve turning off the electricity for unidentified swaths of the PJM footprint, all in service of a single industry – PJM's possession of proactive ability to condition and pace the commencement of large load interconnections is a necessary tool to mitigate curtailments.

The PJM Board initiated a Critical Issue Fast Path (CIFP) – Large Load Additions process that engaged stakeholder discussions on how to address the impact to consumer costs and reliability imposed by large loads, with the ultimate goal of filing that solution with FERC.[37] Much to the dismay and surprise of the Joint Consumer Advocates, PJM initially included the option of curtailing power to residential end users, hospitals, schools, and small and large commercial end users to accommodate the extraordinary demands of data centers.[38] PJM continued on with this idea in its final proposal, which recommended that the PJM Board institute a second CIFP process "to ensure that loads are prioritized appropriately when load shedding is required in order to

(March 2025), https://eelp.law.harvard.edu/wp-content/uploads/2025/03/Harvard-ELI-Extracting-Profits-from-the-Public.pdf (City of Cleveland, Ohio has a 300 MW system).

[37] *See* David E. Mills, Chair, PJM Board of Managers, PJM Board Letter Regarding Implementation of Critical Issue Fast Path Process for Large Load Additions (Aug. 8, 2025), https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2025/20250808-pjm-board-letter-re-implementation-of-critical-issue-fast-path-process-for-large-load-additions.pdf.

[38] *See* PJM Interconnection, Critical Issue Fast Path - Large Load Additions, PJM Conceptual Proposal and Request for Member Feedback, p. 9 (Aug. 18, 2025), https://www.pjm.com/-/media/DotCom/committees-groups/cifp-lla/2025/20250818/20250818-item-03---pjm-conceptual-proposal-and-request-for-member-feedback---presentation.pdf ("PJM would direct the NCBL to areas as required to maintain reliability. This includes clarification of priority order, triggering emergency action, and projected hours/year.").

maintain supply and demand balance in real time operations."[39] This "follow-on work to enhance the current manual load shedding allocation methodology" is under the assumption that capacity in PJM will be "deficient."[40] Simply put, these proposals violate the core principles of reliability that RTOs like PJM were designed to protect.[41] PJM should create rules that would mitigate the degrading of grid reliability to the detriment of existing customers, by new large loads who have not contributed to or paid for that reliability. The remedy the IMM seeks in its Complaint would establish a proactive process for conditioning large load interconnections to the BPS, appropriately pacing the interconnections in step with maintaining grid reliability for the existing users of the BPS. This result conforms to the requirements of the Federal Power Act and is necessary for PJM's ability to fulfill its obligations as the administrator of the BPS in the PJM region.

PJM's role is undermined if these central obligations are undermined by the continued proliferation of data centers and AI deployment within its region. PJM is not responsible for advancing the interests of any specific industry, such as the development and proliferation of data centers and AI, except by policies and practices that meets its core mission to delivery electricity reliability to its customers, Thus, PJM's responsibility as it relates to this single industry should be to do the job it was created to do well – maintain reliability for the electric grid.

[39] PJM, Executive Summary: PJM Large Load Additions CIFP Stage 4 Package, p. 5, https://www.pjm.com/-/media/DotCom/committees-groups/cifp-lla/2025/20251119/20251119-item-02a---pjm-lla-cifp-stage-4-package---executive-summary.pdf.

[40] *Id.*

[41] Energy Policy Act of 2005, Pub. L. No. 109-58, 119 Stat. 594. Section 219(a) of this Act directs FERC to "establish, by rule, incentive-based . . . rate treatments for the transmission of electric energy in interstate commerce by public utilities for the purpose of benefitting consumers by ensuring reliability and reducing the cost of delivered power by reducing transmission congestion." 16 U.S.C. 824s(a). *See also*, *August 2003 Blackout*, U.S. Dep't of Energy, https://www.energy.gov/oe/august-2003-blackout (last visited Dec. 15, 2025) (providing resources and documentation regarding the "worst power blackout in history" in the northeastern U.S. and southern Canada).

III. CONCLUSION

WHEREFORE, for the forgoing reasons, the Pennsylvania Office of Consumer Advocate, the Office of the Illinois Attorney General, the Maryland People's Counsel, the Delaware Division of the Public Advocate, the Office of Ohio Consumers' Counsel, and the Illinois Citizens Utility Board respectfully request that the Commission grant the relief requested by the Independent Market Monitor in its Complaint.

Counsel for: Darryl Lawrence Consumer Advocate Pennsylvania Office of Consumer Advocate Dated: December 15, 2025	Respectfully submitted, /s/ *Melanie Joy El Atieh* Melanie Joy El Atieh, Deputy Consumer Advocate Jacob Guthrie, Assistant Consumer Advocate Josiah Harmar, Assistant Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 717-783-5048 MElAtieh@paoca.org JGuthrie@paoca.org JHarmar@paoca.org
Counsel for: Office of the Illinois Attorney General, Kwame Raoul Dated: December 15, 2025	*/s/ Kimberly B. Janas* Susan L. Satter, Chief, Public Utilities Bureau Kimberly B. Janas, Counsel to the Attorney General Scott Metzger, Senior Assistant Attorney General 115 South LaSalle Street, 25th Floor Chicago, IL 60603 (312) 771-1632 susan.satter@ilag.gov kimberly.janas@ilag.gov scott.metzger@ilag.gov
Counsel for: David S. Lapp Maryland People's Counsel Maryland Office of People's Counsel Dated: December 15, 2025	/s/ *William Fields* William Fields, Deputy People's Counsel Philip Sussler, Senior Assistant People's Counsel 6 St. Paul Street, #2102 Baltimore, MD 21202 (410)767-8150 William.fields@maryland.gov Philip Sussler@maryland.gov

Counsel for: Delaware Division of the Public Advocate Jameson A.L. Tweedie, Public Advocate Dated: December 15, 2025	/s/ *David Crumplar* David Crumplar (DE Bar ID No. 5876) Deputy Attorney General 820 N. French St., 6th Floor Wilmington, DE 19801 Phone: 302-577-8400 *David.Crumplar@delaware.gov*
Counsel for: Office of the Ohio Consumers' Counsel Dated: December 15, 2025	/s/ *Maureen R. Willis* Maureen R. Willis (0020847) Ohio Consumers' Counsel Angela D. O'Brien Deputy Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, Suite 700 Columbus, Ohio 43215 Telephone: (614) 466-9567 maureen.willis@occ.ohio.gov Telephone: (614) 466-9531 angela.obrien@occ.ohio.gov
Counsel for: Illinois Citizens Utility Board Dated December 15, 2025	/s/ *Eric DeBellis* Eric DeBellis General Counsel Illinois Citizens Utility Board 309 West Washington Street Suite 800 Chicago, IL 60606 edebellis@citizensutilityboard.org

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on those parties on the official Service List compiled by the Secretary in these proceedings.

Dated at Harrisburg, Pennsylvania this 15th day of December, 2025.

/s/ *Josiah B. Harmar*
Josiah Harmar
Assistant Consumer Advocate
Pennsylvania Office of Consumer Advocate
PA Attorney ID # 338426
JHarmar@paoca.org