

May 5, 2026

**National Conference of Regulatory
Attorneys 2026**

**FERC's Data Center
ANOPR and the
Rise of Hyperscale
Load**

**Elizabeth Barnes
Deputy Chief Counsel**



Comments of the Pennsylvania Public Utility Commission; Docket No. RM26-4



The integration of large load must be planned in an orderly fashion, respecting physical limits that our grid faces both in the context of the facilities used for transmission and distribution as well as the area of system stability, energy prices, and resource adequacy. So too, jurisdictional lines must be respected, not just for the sake of history and precedents, but because our near century-long bright line of jurisdiction provides major economic development benefits to our nation and individual states through predictability. With that in mind, the PA PUC submitted comments regarding jurisdiction as well as likely violations of the major questions doctrine and nondelegation doctrine. Although we believe that in many respects the ANOPR goes beyond what is legally and economically justified, there remains opportunity for further discussion. https://www.puc.pa.gov/media/3729/ferc-rm26-4-pa-puc-comments_11212025.pdf



Electric Pricing



Residential Default Service Price To Compares (PTC) - in cents per kWh:

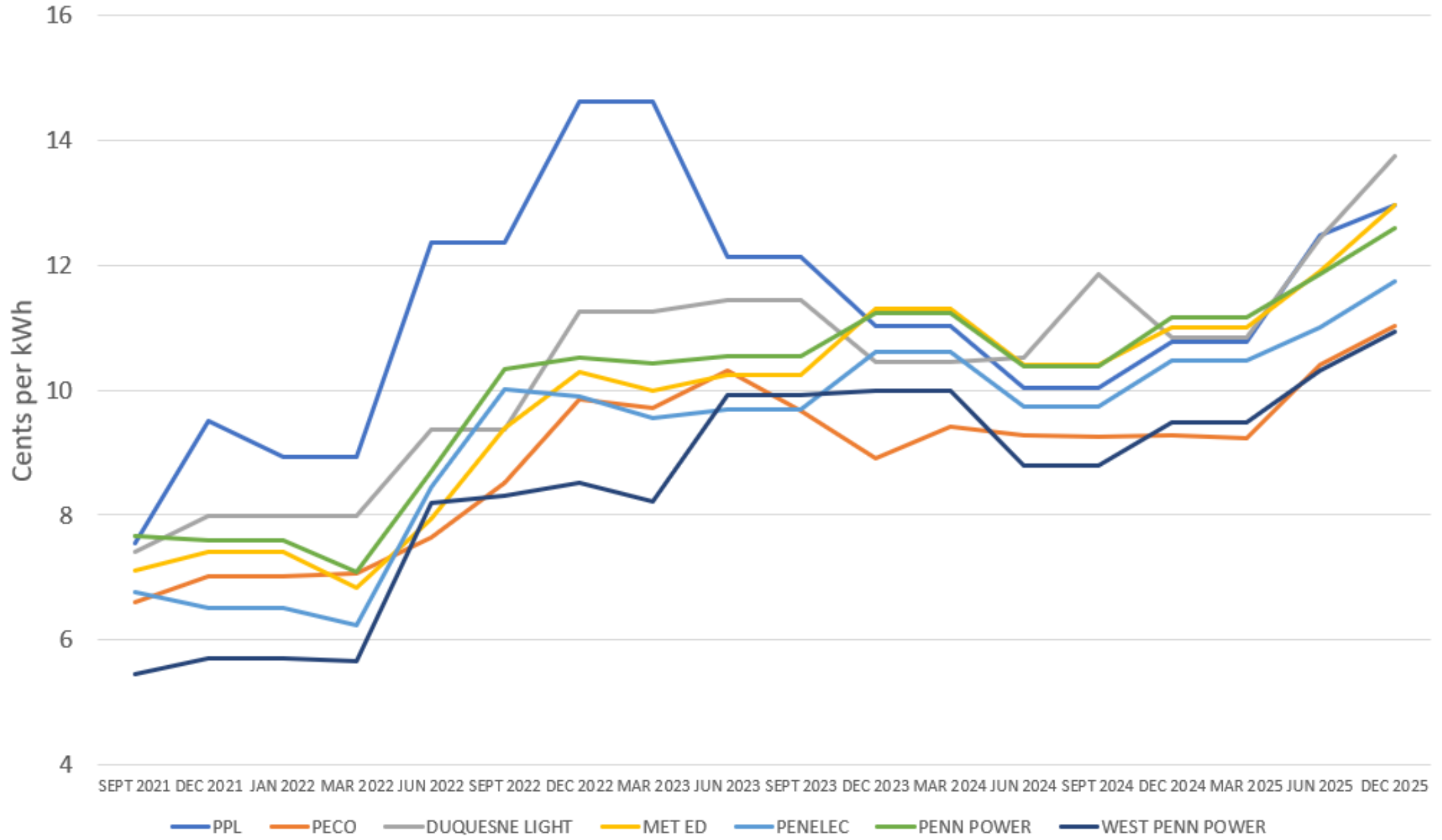
	JUNE 1 2025 PTC	DECEMBER 1 2025 PTC	PERCENT CHANGE on DEC 1
PPL	12.490	12.953	3.7%
PECO	10.400	11.024	6.0%
DUQUESNE	12.43	13.75	10.62%
MET ED	11.905	12.965	8.9%
PENELEC	11.004	11.747	6.75%
PENN POWER	11.858	12.606	6.31%
WEST PENN	10.318	10.947	6.1%

Residential Electric PTCs

December 2024
and
December 2025
Compared:

	DEC 1 2024 PTC	DEC 1 2025 PTC	PERCENT CHANGE 2024-25
PPL	10.771	12.953	20.26%
PECO	9.273	11.024	18.88%
DUQUESNE	10.85	13.75	26.73%
MET ED	11.011	12.965	17.75%
PENELEC	10.474	11.747	12.15%
PENN POWER	11.168	12.606	12.88%
WEST PENN	9.481	10.947	15.46%

EDC Residential PTCs 2021 - 2025





PAPUC

PENNSYLVANIA PUBLIC UTILITY COMMISSION

**PJM
Capacity Auction**





PJM Capacity Auction Results

RPM Base Residual Auction Resource Clearing Price Results in the RTO

Delivery Year	Auction Results				
	Resource Clearing Price	Cleared UCAP (MW)	RPM Reserve Margin ¹	Total Reserve Margin ^{1,2,6}	Cleared MW Times Clearing Price (\$ billion)
2017/18	\$120.00	167,003.7	20.1%	19.7%	\$7.5
2018/19	\$164.77	166,836.9	20.2%	19.8%	\$10.9
2019/20	\$100.00	167,305.9	22.9%	22.4%	\$7.0
2020/21 ³	\$76.53	165,109.2	23.9%	23.3%	\$7.0
2021/22	\$140.00	163,627.3	22.0%	21.5%	\$9.3
2022/23	\$50.00	144,477.3	21.1%	19.9%	\$3.9
2023/24	\$34.13	144,870.6	21.6%	20.3%	\$2.2
2024/25	\$28.92	147,478.9	21.7%	20.4%	\$2.2
2025/26 ⁴	\$269.92	135,684.0	18.6%	18.5%	\$14.7
2026/27 ⁵	\$329.17	134,205.3	18.9%	18.9%	\$16.1
2027/28	\$333.44	134,478.1	14.4%	14.8%	\$16.4



December 2025 PJM Capacity Auction Results

<https://insidelines.pjm.com/pjm-auction-procures-134479-mw-of-generation-resources/>

- The capacity of the resources procured is short of PJM’s reliability requirement by 6,623 MW, meaning that the committed supply is less than what would be required to meet the one-event-in-10-year reliability standard of a 20% reserve margin.
- *“This does not necessarily mean, however, that the PJM system will be unable to serve load reliability in the delivery year. PJM continues to hold a reserve margin of 14.8%, and there are several mitigating factors that could improve the reliability picture for the system in the 2027/2028 Delivery Year.”*
 - Expected reduction in the forecasted peak demand for the 2027/2028 Delivery Year.
 - Potential for generators with announced retirements to continue operating.
 - Some generators that could not make year-round capacity commitments are still expected to be available to provide energy when needed.



December 2025 PJM Capacity Auction Results

<https://insidelines.pjm.com/pjm-auction-procures-134479-mw-of-generation-resources/>

“We believe that these factors will result in the system being very close to the one-in-10 standard in the delivery year,” said Stu Bresler, Executive Vice President - Market Services and Strategy, who becomes chief operating officer on Jan. 7. “But this auction leaves no doubt that data centers’ demand for electricity continues to far outstrip new supply, and the solution will require concerted action involving PJM, its stakeholders, state and federal partners, and the data center industry itself.”



DECEMBER 3, 2025 GOVERNOR'S LETTER TO PJM:

December 3, 2025

Mr. David Mills
Chair, PJM Board of Managers
2750 Monroe Blvd.
Audubon, PA 19403

Dear Chairman Mills,

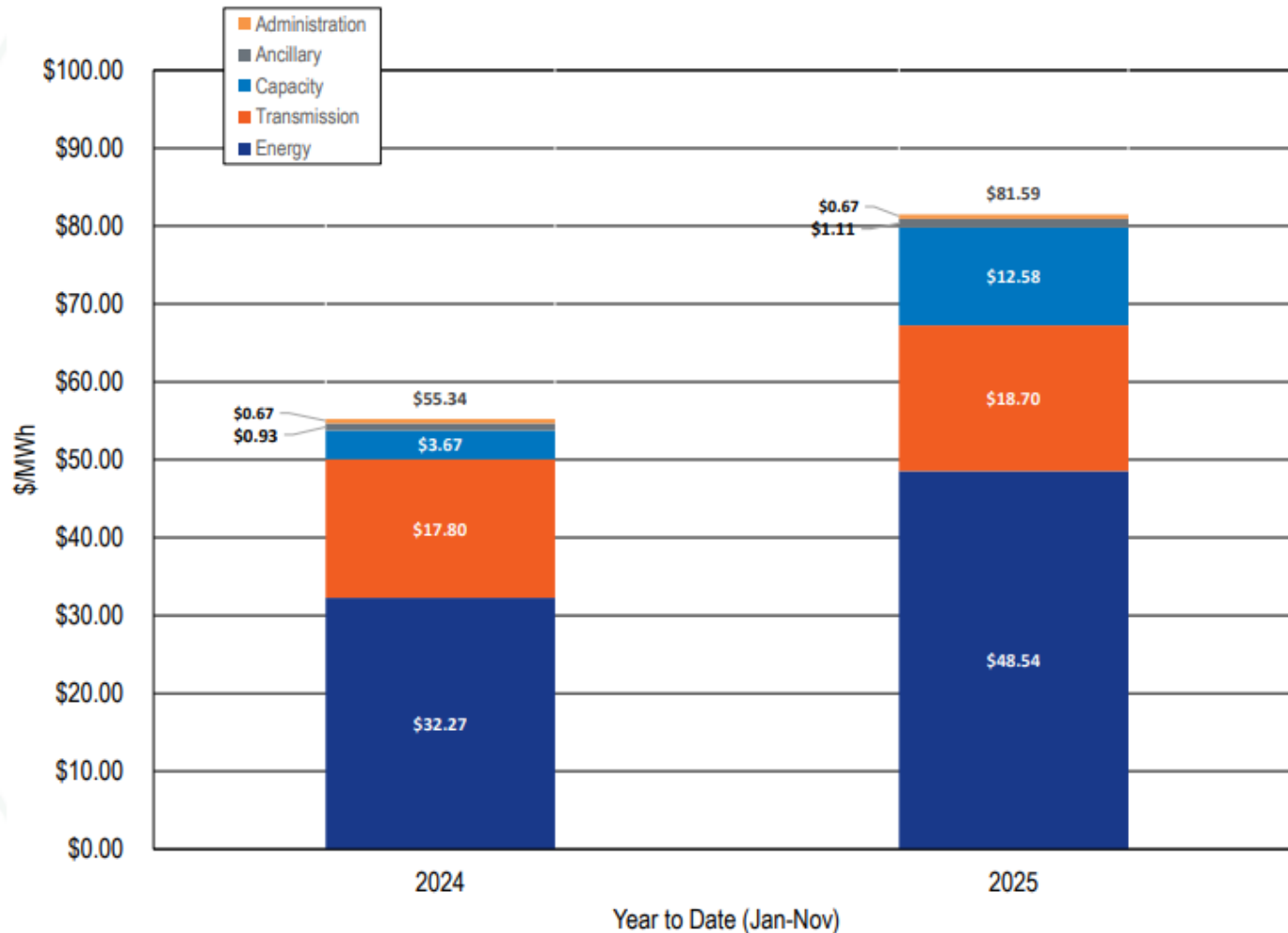
Over the last three months—since your August 8 letter initiating the Critical Issue Fast Path (CIFP) process—the PJM community has sought to find consensus solutions to integrate large load additions (LLAs) into our shared grid while ensuring reliability and affordability. The November 19 Members Committee votes—in which all twelve proposals were overwhelmingly rejected—make clear that this effort has fallen well short of consensus, and more importantly, has failed to provide both the reliability and affordability that our communities rely on from PJM.

As representatives of millions of PJM customers, we actively engaged in the Critical Issue Fast Path (CIFP) process on Large Load Additions (LLAs) at multiple points, including in collaboration with other stakeholders. All our engagement has been intended to protect customers from excessive price increases in future Base Residual Auctions, to secure grid reliability and to develop new mechanisms that incent new generation. Given the Members' votes, we are greatly concerned that we will shortly end up with the least desirable outcome: forthcoming auctions that yield extraordinarily high prices but neither

- Requests to extend the price floor and ceiling for one additional auction.
- Next auction: June 2026.

PJM Market Monitor - Wholesale Electric Prices: 2024 - 2025

Total Cost of Wholesale Power



Percent of total generation charges:

	2024	2025
ADMIN	1.2%	.8%
ANCILLARY	1.6%	1.4%
CAPACITY	6.6%	15.4%
TRANSMISSION	32.2%	22.9%
ENERGY	58.3%	59.5%

Increase 2024 - 2025: 47.4%

A megawatt hour (MWh) equals 1,000 kilowatts of electricity generated per hour.

<https://www.pjm.com/-/media/DotCom/committees-groups/committees/mc/2025/20251217/20251217-item-04---market-monitoring-report---presentation.pdf>



Resource Adequacy



November 6 Tentative Order for Comment

Complaints

Learn how to submit a complaint with a public utility. You can also search existing formal complaints.

GET DETAILS

PUC Advances Plan to Balance Data Center Growth and Consumer Protection

Published on 11/6/2025

Filed under: [Electric](#)

Tentative Order outlines model tariff for large-load customers, aiming to strengthen reliability and ensure new users pay their fair share

HARRISBURG – The Pennsylvania Public Utility Commission (PUC) today voted 3-2 to advance its ongoing review of large-load growth — including hyperscale data centers — by issuing a **Tentative**

- M-2025-3054271 <https://www.puc.pa.gov/docket/M-2025-3054271>
- 30-day comment period - closed December 22.
- 100+ comments (mostly individuals)
- **Utilities:** EDCs, EAP, PAWC, generators/suppliers.
- **Advocates:** OCA, OSBA, CAUSE-PA, CAC, Industrials, environmentalists.
- **Data Centers:** Amazon, Google, Data Center Coalition.
- **Government:** Governor, State Reps and Senators.

Resource Adequacy: Large Load Tariffs Next?



- Final Order - Model large load tariff
- Also being looked into by the General Assembly and the Administration.
- Also being looked at in other states, PJM, FERC, Federal Government, etc.
- PPL tariff in rate case pending

January 16: Trump Admin & Governors



Trump Administration Calls for Emergency Power Auction to Build Big Power Plants Again

Building a more reliable and affordable electricity supply for American industry and families across the Mid-Atlantic U.S.

[Energy.gov](https://www.energy.gov)

January 16, 2026

4 min

<https://www.energy.gov/articles/trump-administration-calls-emergency-power-auction-build-big-power-plants-again>

WASHINGTON—U.S. Secretary of Energy Chris Wright and Secretary of the Interior Doug Burgum, vice-chair and chair of the National Energy Dominance Council (NEDC) respectively, today joined Mid-Atlantic governors urging PJM Interconnection, LLC (PJM) to temporarily overhaul its market rules to strengthen grid reliability and reduce electricity costs for American families and businesses by building more than \$15 billion of reliable baseload power generation.

Governor Shapiro Secures Federal Support to Extend PJM Price Cap, Saving Consumers Tens of Billions of Dollars and Preventing Price Hikes Across 13 States

Governor Shapiro's energy leadership continues to drive progress to expand generation and protect consumers.

For more than two years, the Governor has been sounding the alarm on PJM's broken market rules and warning that rising energy costs would be passed directly onto consumers unless immediate action was taken.

<https://www.pa.gov/governor/newsroom/2026-press-releases/gov-shapiro-secures-federal-support-to-extend-pjm-price-cap>

January 16: Statement of Principles



“The National Energy Dominance Council within the White House and the Undersigned Governors Urge PJM Expeditiously to File Proposed Tariff Revisions at FERC that Reflect the Set of Principles Stated Below:”

- Provide 15-year price certainty for new capacity resources. Hold a Reliability Backstop Auction to procure new capacity resources by September 2026.
- Extend capacity price floor/ceiling for an additional 2 base capacity auctions.

January 16: Statement of Principles



- Allocate Costs to Data Centers: PJM should allocate the cost of any new capacity procured through the reliability backstop auctions to load serving entities with new data centers.
- Improve load forecasting.
- Accelerate generation interconnection studies.
- Stakeholder process to reform capacity market.

January 16: Statement of Principles



The Undersigned Governors agree to:

- Use their authority to ensure that their PUCs design rate structures to ensure that costs are allocated to data centers and protect residential customers.
- Pennsylvania, Indiana, Ohio, Maryland, Virginia, West Virginia, Delaware, Illinois, Michigan, New Jersey, Tennessee, North Carolina, Kentucky.

January 16: PJM Announcement



<https://insidelines.pjm.com/pjm-board-outlines-plans-to-integrate-large-loads-reliably/>

News

PJM Board Outlines Plans To Integrate Large Loads Reliably

Proposals would balance system needs with affordability for consumers

January 16, 2026

85

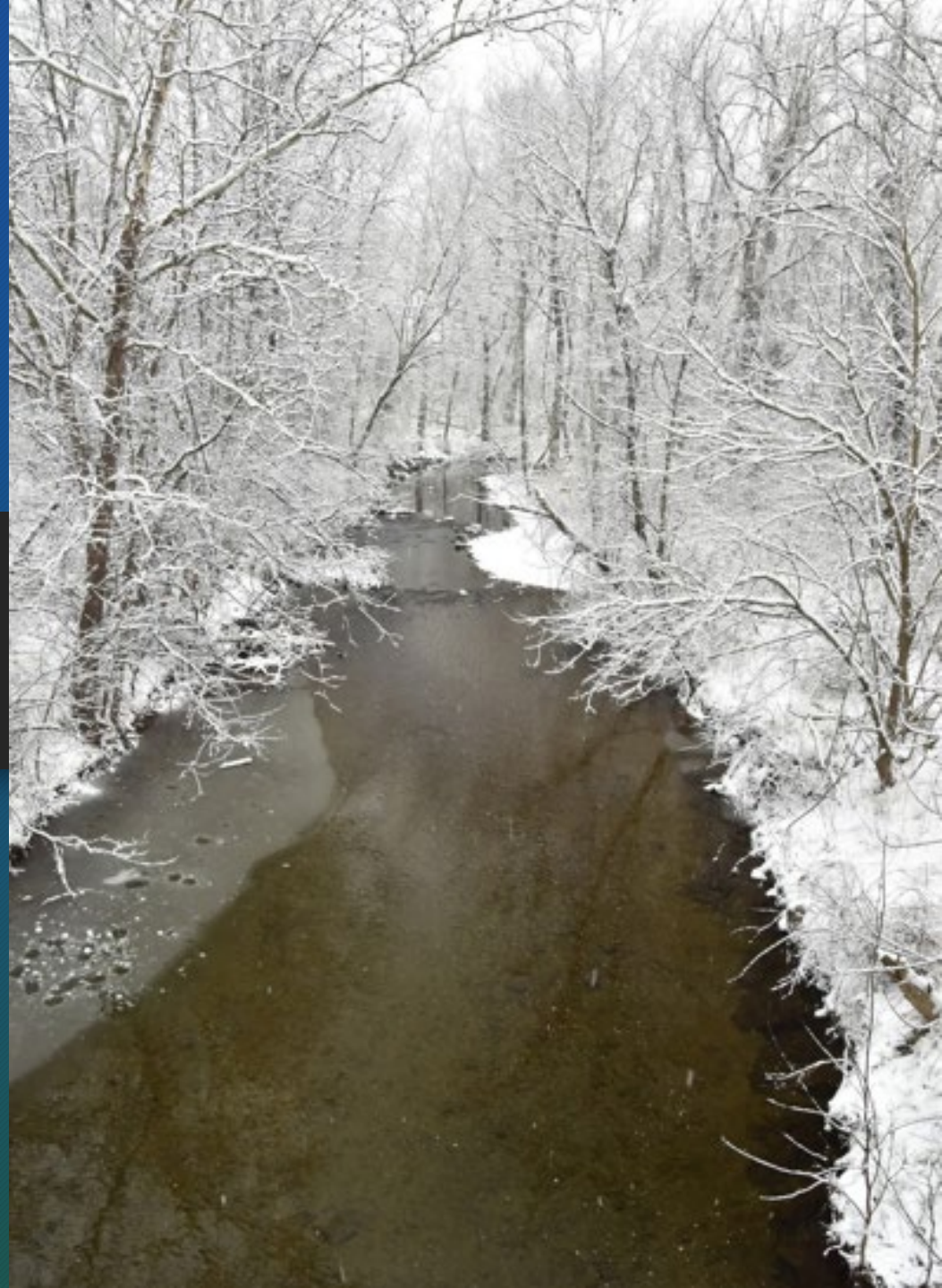


(Valley Forge, PA – Jan. 16, 2026) – The PJM Board of Managers today outlined a series of actions to be taken by PJM and its stakeholders in 2026 to address the multiple challenges of integrating new data centers and other large load customers onto the grid while preserving electricity system reliability and affordability for the 67 million people PJM serves.

- Significant load forecasting improvements and increased role for states.
- Avenues for new large loads to bring their own new generation or enter into a connect and manage framework subject to earlier curtailment.
- Creation of an accelerated interconnection track for state-sponsored generation projects.
- Immediate initiation of a backstop generation procurement process to address short-term reliability needs.
- A review of PJM markets to assess how they can best work in combination to support investment.
- Seeking comment on extending capacity price floor and ceiling. January 30.



Load Forecasting



Load Forecasting in 2026:



- M-2025-3058496 - December 4 Public Meeting
- Act 45 of 2025 - tasked the PUC with exercising more oversight of electric load forecasting.
- PUC data requests to EDCs and OPSI States
- Consultant hired to produce long-term load forecasts.

**PENNSYLVANIA PUBLIC UTILITY COMMISSION
HARRISBURG, PENNSYLVANIA 17120**

***Evaluation of Proposals
To Select the Resource
Adequacy Consultant***

**Public Meeting of December 4, 2025
Agenda No. 3058496-TUS
Docket No. M-2025-3058496**

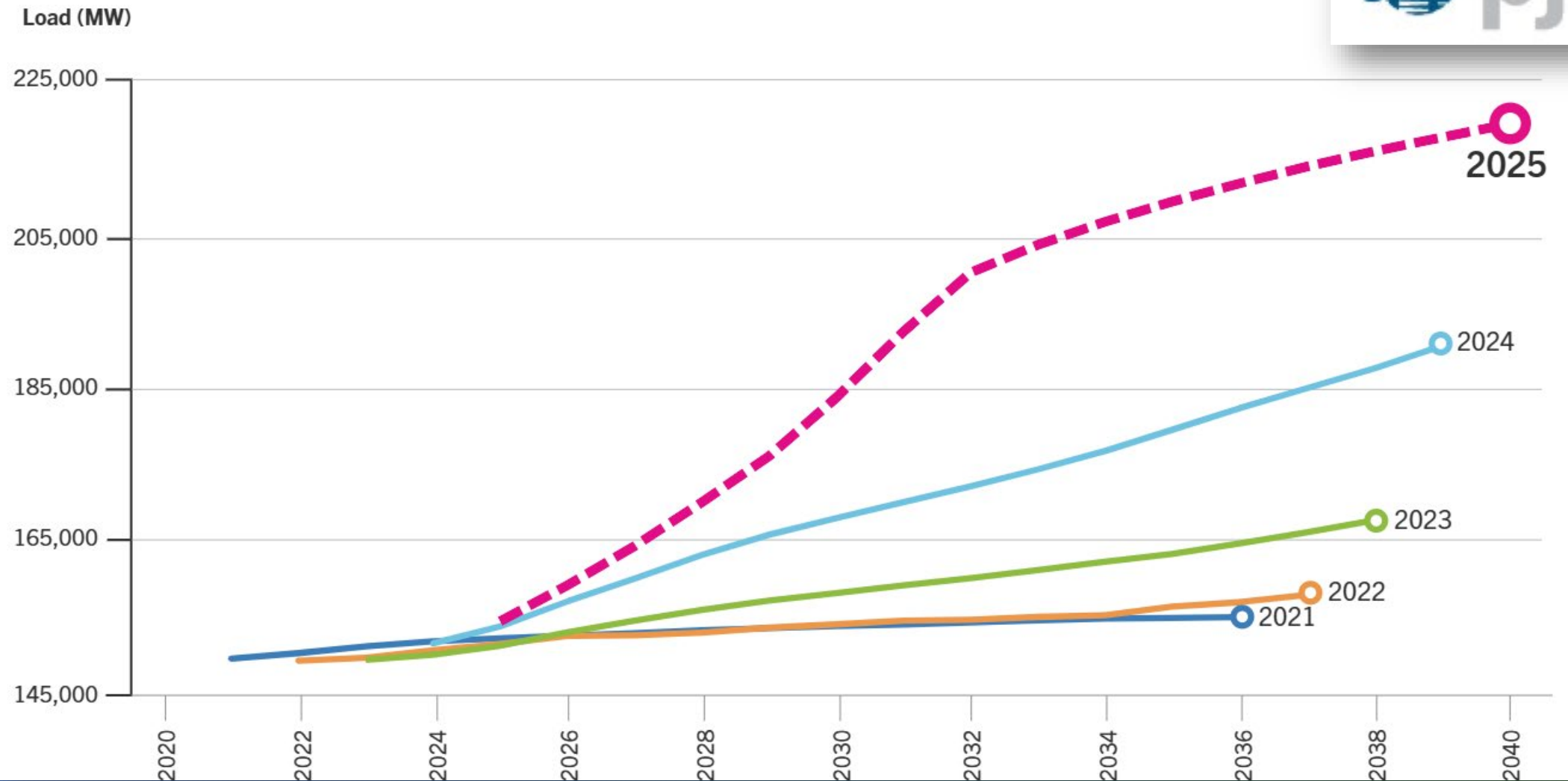
STATEMENT OF CHAIRMAN STEPHEN M. DeFRANK

*Before us for consideration today is a preliminary selection for a consultant in response to the Commission's Request for Proposals for a Resource Adequacy Consultant. First, I would like to commend Vice Chair Barrow for her foresight in convening a series of stakeholder conversations on resource adequacy last year. Since then, the Commission held its resource adequacy technical conference and its *en banc* hearing on large load tariffs. The proposal today is another component of the Commission's ongoing efforts to ensure affordability and reliability in this time of unprecedented change to our electric grid.*

<https://www.puc.pa.gov/pcdocs/1904795.pdf>



PJM RTO Summer Peak Demand Forecast



<https://services.pjm.com/annualreport2024/planning/>

MW: megawatt, which is a unit of measurement for power that is equal to one million watts.

PJM 20-Year Load Forecast

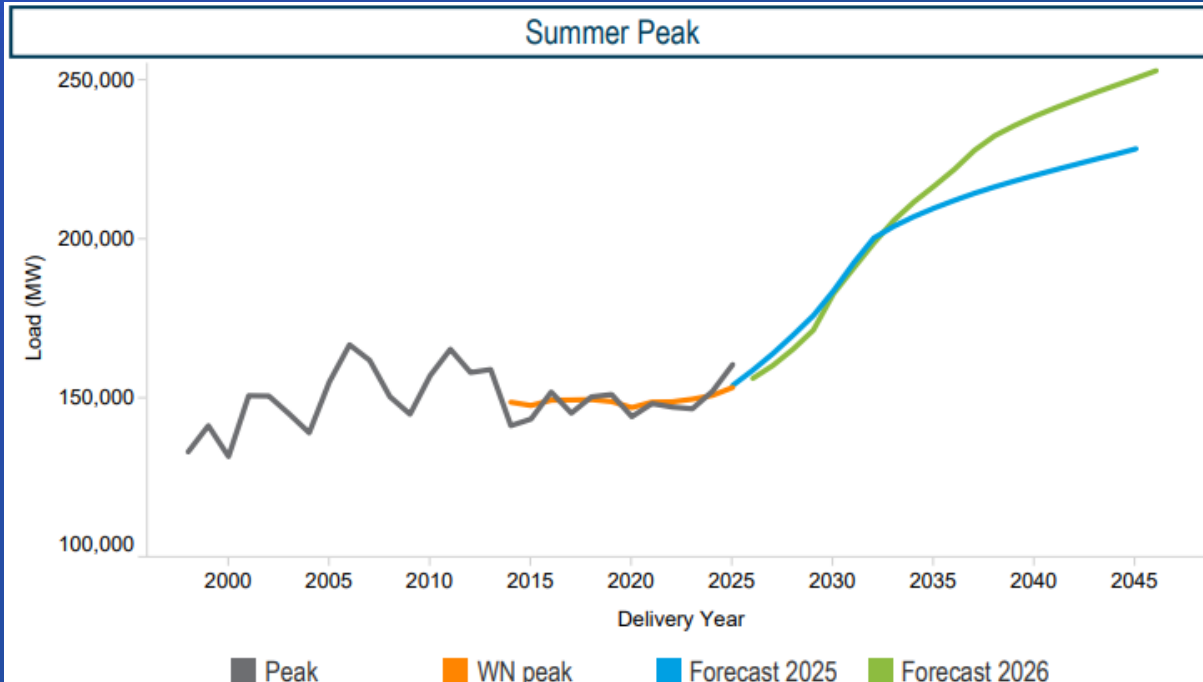
The screenshot shows the PJM Inside Lines website. The header includes the PJM logo, the text 'PJM Inside Lines', and navigation links for 'HOME', 'ARCHIVES', and 'CONTACT'. Below the header is a breadcrumb trail: 'Home > Planning > PJM's Updated 20-Year Forecast Continues To See Significant Long-Term Load Growth'. A 'Planning' tag is visible. The main headline reads 'PJM's Updated 20-Year Forecast Continues To See Significant Long-Term Load Growth'. Below the headline is a sub-headline: 'Demand for Near-Term Years Adjusted Slightly Downward'. The date 'January 14, 2026' is displayed. There are social media sharing icons for Facebook, X, Pinterest, and WhatsApp. At the bottom, the beginning of the article text is visible: 'The PJM 2026 Long-Term Load Forecast Report confirms the trend of significant growth in electricity demand over the next 20 years but slightly decreases the expected load growth'.

The PJM 2026 Long-Term Load Forecast Report confirms the trend of significant growth in electricity demand over the next 20 years but slightly decreases the expected load growth for near-term years compared with last year's report.

The 2026 Long-Term Load Forecast Report anticipates lower peak demand in the near-term through 2032 due to updates to the electric vehicle and economic forecasts as well as improved vetting of requested adjustments for data centers and large loads.

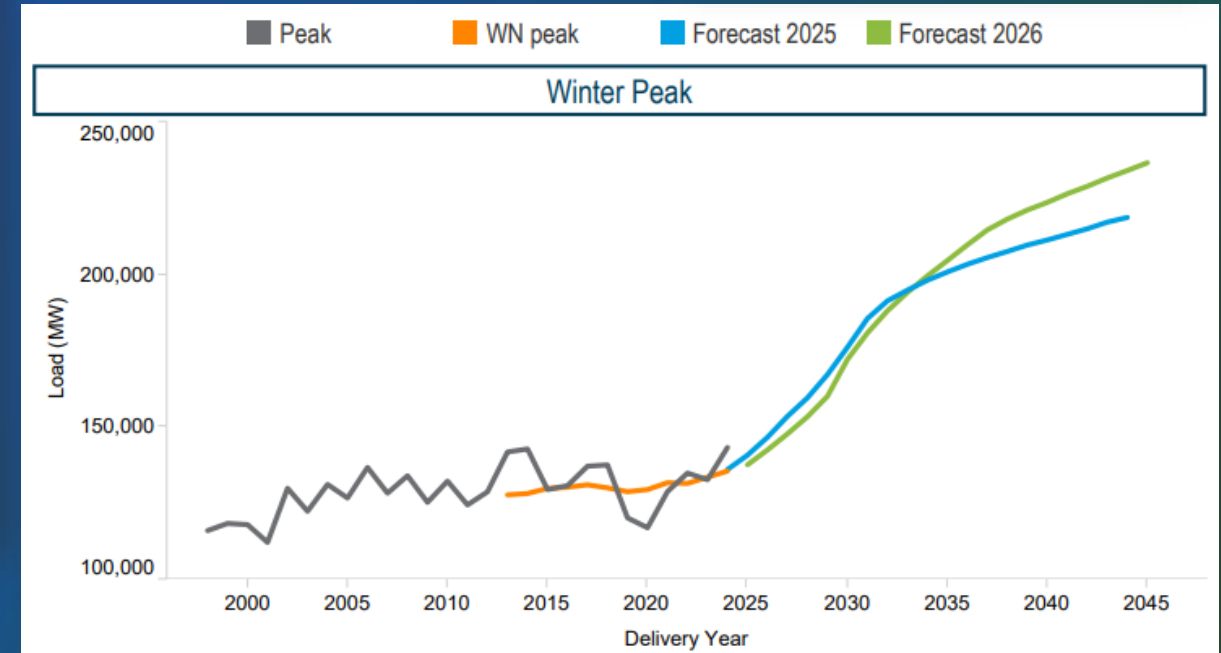
<https://insidelines.pjm.com/pjms-updated-20-year-forecast-continues-to-see-significant-long-term-load-growth/>

PJM 20-Year Load Forecast



Summer peak load growth is projected to average 3.6% per year over the next 10-year period and 2.4% over the next 20 years

<https://www.pjm.com/-/media/DotCom/library/reports-notices/load-forecast/2026-load-report.pdf>



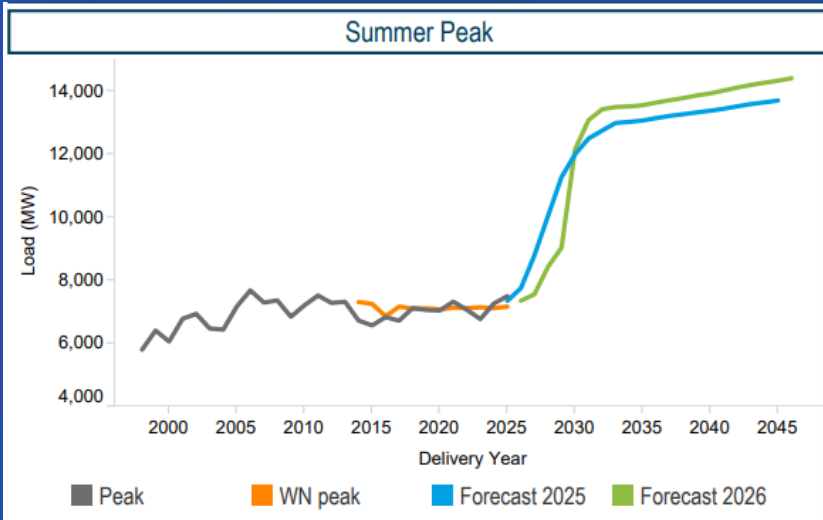
Winter peak load growth is projected to average 4.0% per year over the next 10-year period and 2.7% over the next 20 years.

WN Weather-normalized load produced by model run showing median historical seasonal peaks

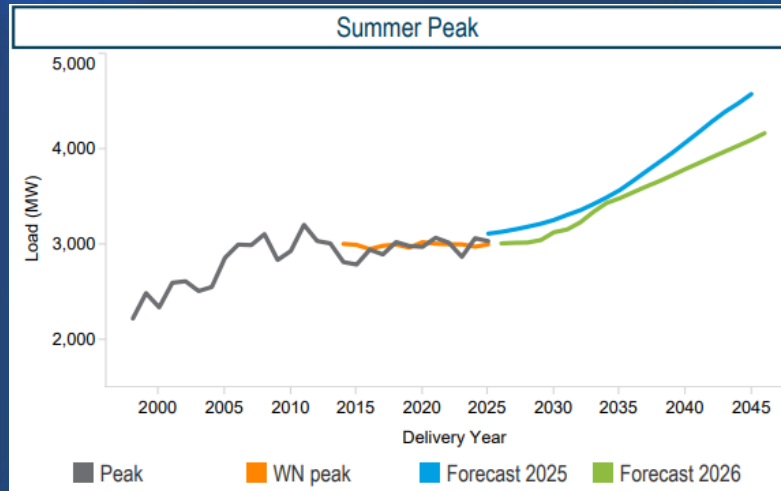
PJM 20-Year Load Forecast



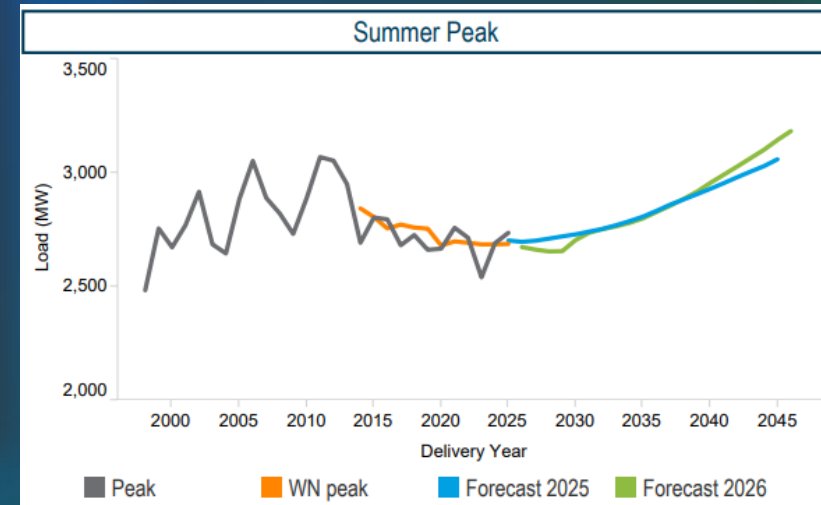
PPL Electric Utilities (PL)



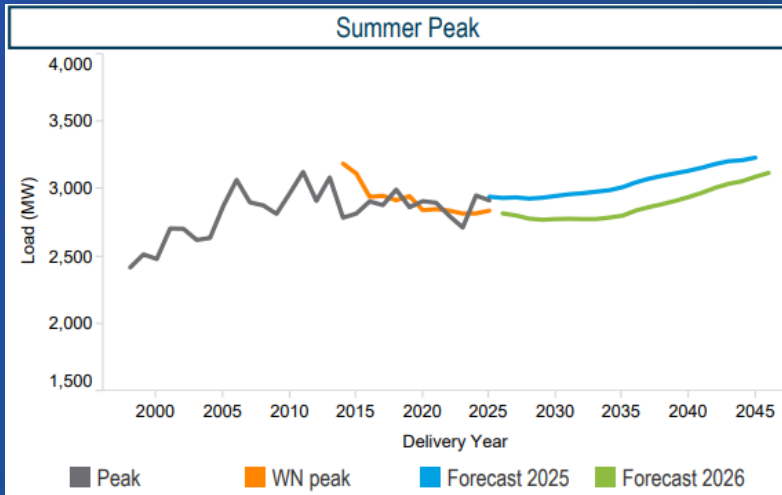
Metropolitan Edison (METED)



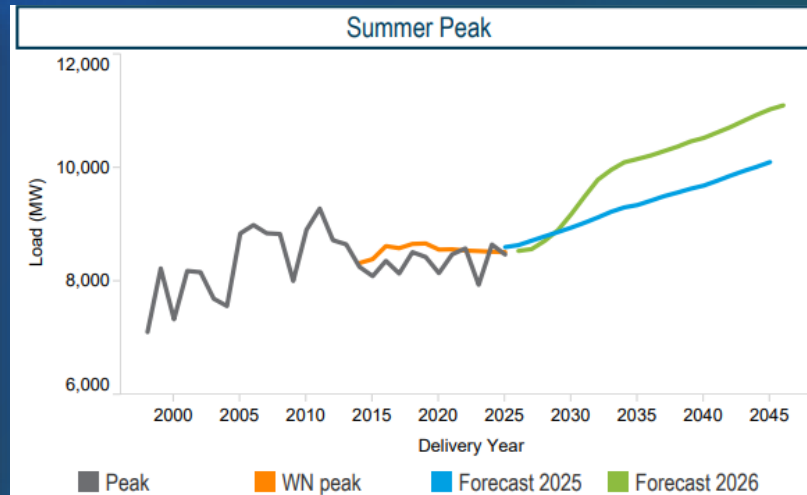
Duquesne Light Company (DLCO)



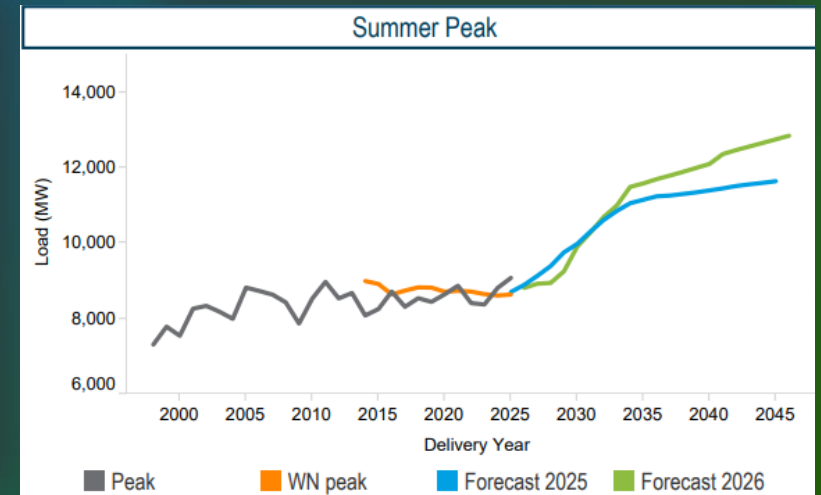
Pennsylvania Electric Company (PENLC)



PECO Energy (PECO)



Allegheny Power Systems (APS)



Energy Information Administration - January 2026 Projections:



Electricity consumption. We forecast electricity consumption will grow by 1% in 2026 and 3% in 2027, marking the first four years of consecutive growth since 2005-07, and the strongest four-year period of growth since the turn of the century. Rising electricity consumption in our forecast is mostly the result of growing power demand in the commercial and industrial sectors.

Electric Power Outlook Report

- Regional Electric Outlook
- Pennsylvania Electric Outlook
- Generation Plant Additions and Upgrades
- Existing Generating Facilities
- 10-Year Demand and Peak Forecasts

PAPUC

**Electric Power Outlook
for Pennsylvania
2024-2029**

August 2025

<https://www.puc.pa.gov/filing-resources/reports/electric-power-outlook-report/>



PENNSYLVANIA PUBLIC UTILITY COMMISSION

Thank You for Your Attention.

Elizabeth Barnes
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ebarnes@pa.gov