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The Honorable Chris Wright
Secretary of Energy
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

**Re: Request for Emergency Order Under Federal Power Act, Section 202(c),
Encompassing Relief for Both Specified Resources and the Operation of Backup Generation
Resources**

Dear Secretary Wright:

Because of anticipated system conditions, pursuant to Federal Power Act ("FPA"), Section 202(c)¹ and part 205, subpart W, of the regulations of the Department of Energy ("DOE" or "Department"),² and also in response to the January 22, 2026 letter,³ PJM Interconnection, L.L.C. ("PJM") respectfully requests that the Secretary of Energy ("Secretary") find that an imminent electric reliability emergency will exist that will threaten transmission reliability and the ability to serve load in the PJM Region due to a shortage of electric energy, a shortage of facilities for the generation of electric energy, and other causes as set forth herein.

And in the event that PJM determines that generation from Specified Resources (as described further below and as will be listed on Exhibit A) is necessary to meet the electricity demand that PJM anticipates in its service territory, PJM requests an order directing PJM to dispatch such unit or units and to order their operation only as needed to maintain reliability.

PJM also requests authorization for PJM to direct backup generation resources (whether auxiliary, standby, directly connected, battery storage or other, and whether synchronized or not to the bulk power system) at large loads to operate as a last resort before declaring an Energy Emergency Alert (EEA) 3 (i.e., before firm load interruption) or during an EEA 3.⁴ PJM further requests that any order make clear that PJM may call upon its Transmission Owners to work with Electric Distribution Companies to take lawful actions to implement this aspect of the requested relief and support customers in bringing these backup resources online.

¹ 16 U.S.C. § 824a(c).

² 42 U.S.C. § § 7101 and 7151(b).

³ Letter from Secretary of Energy Chris Wright to Reliability Coordinators and Balancing Authorities (Jan. 22, 2026), <https://www.energy.gov/documents/leveraging-backup-generation-facilities-during-energy-emergencies>.

⁴ See NERC Reliability Standard EOP-011-4, Attachment 1, at 3.1 ("The Reliability Coordinators and the energy deficient Balancing Authority shall continue to take all actions initiated during EEA 2.").

PJM respectfully requests that the Secretary issue an order granting the relief requested herein as soon as possible, and for such order to be effective through 11:59 p.m. Eastern Prevailing Time on September 18, 2026, which is the date temperatures in the PJM Region are forecasted to decrease. Granting the relief on this timeline will help PJM keep this generation online for peak times and for a period of time thereafter while the emergency conditions abate.

* * *

PJM is requesting emergency relief to assist in maintaining reliable electric service under ongoing emergency system conditions that are forecasted to persist through at least the end of Friday, September 18.

At the time of this request, PJM has issued a Maximum Generation/Load Management Alert and declared an Energy Emergency Alert Level 1 (EEA-1) for September 17–18, 2026 due to the combined impacts of elevated electric demand, generation outages, planned transmission outages, and significant firm export obligations. Indeed, PJM is forecasted to be approximately 700 MW below its reserve margin on September 17, 2026.

PJM forecasts demand at or around 133,285 MW (or higher) on September 17. System conditions are being driven by elevated demand, a high generation outage rate due to planned outages during the autumn outage season, and numerous planned transmission outages. In addition, north-to-south transfers are being limited by loading on the Conastone-Peach Bottom 5012 500 kV facility. These conditions are increasing system stress. In addition, generation outages (anticipated to reach around 33,191 MW) across the RTO are reducing operating flexibility and increased reliance on all available resources, and such issues are being experienced most acutely in BGE, PEPCO, and Dominion zones, to maintain transmission flows within established limits.

The forecasted conditions raise a significant risk of emergency conditions that could jeopardize electric reliability and public safety. Such conditions could arise from, among other things, PJM RTO capacity deficiencies and/or transmission constraints. On the evening of September 15, 2026, when system conditions were comparatively more mild, PJM experienced transmission overloads in parts of its system that required implementation of Transmission Loading Relief (“TLR”). As temperatures and loads increase, the potential for such circumstances increase further. And if unforeseen contingencies – like generation or line losses – were to arise, the reliability impacts to the PJM system could be significant.

PJM is actively evaluating emergency actions, including a TLR request, recalling off-system sales, and deployment of Demand Response resources as needed.

All available generation resources across the PJM footprint have been committed to support reliability on September 17 and September 18. Issuance of a Section 202(c) emergency order would allow PJM to operate otherwise emission-limited generating units and utilize the provisions available under Attachment O of Manual 13 to obtain additional generation needed to support reliability and manage transmission constraints. The requested Section 202(c) order will provide PJM with additional operational flexibility to respond to generation and transmission

contingencies, maintain reliability under stressed system conditions, and manage expected emergency operations through September 18.

Further, PJM may need to implement Load Management, recall off-system sales and take other emergency actions within its authority over the remainder of the week.

PJM anticipates that some generating units will imminently be limited in their power output due to emissions, effluent, and other limits established by environmental permits and state or other requirements, or that, due to continuing hot temperatures and the need for generation, may become subject to such operational limitations. Such limitations will cause them to be unable to interconnect or to discontinue operations absent relief because they have, in some instances, little remaining run time. Specifically, PJM has been informed that the operation of generators that may be impacted by permit restrictions on sulfur dioxide, nitrogen oxides, carbon monoxide, wastewater release, and other air pollutants (including ammonia) or other limitations, such as fuel throughput.⁵ The operational limits, permit restrictions, and interconnection limitations will collectively be called “Operating Limits.” The units appearing on the version of Exhibit A that will be submitted to accompany this application previously did not oppose the relief PJM is requesting herein, and any units added to Exhibit A are not and will not be in opposition to the requested relief.

In the event that PJM identifies additional generation units that it deems necessary to operate to meet the electricity demand that PJM anticipates in its service territory beyond those already listed in Exhibit A, PJM shall provide prompt written notice to the Department of Energy at AskCR@hq.doe.gov listing those units that PJM has identified, in the form of an updated Exhibit A to this Application. PJM requests that any such additional units identified in this manner would be covered without the need for a separate order.

While multiple entities have confirmed Operating Limits based on emissions restrictions, PJM is also aware that many other generators are subject to similar permit limits and state requirements, and it is possible that some of these units could encounter an operational limitation due to a restriction under an environmental permit or state requirement at some point before 11:59 p.m. Eastern Prevailing Time on September 18, 2026. Because the output from all of the generators subject to these restrictions would help to reduce the need for any firm load shedding that may be required during this period, PJM seeks an order from the Department authorizing the provision of additional energy from any units identified in Exhibit A, as well as any other generating units that PJM may deem necessary to operate in excess of Operating Limits in order to maintain the reliability of the power grid in the PJM Region (the “Specified Resources”). It is reasonable to expect that any of the Specified Resources could exceed their Operating Limits during periods when PJM would need to dispatch the units during the emergency. Absent such an order, there is a risk that residences, hospitals, military facilities, water treatment plants, and other critical facilities may lose electric service to all or parts of their facilities due to the lack of adequate generation or transmission.

⁵ See DOE Order No. 202-26-35, Exhibit A (version 4; submitted July 16, 2026), available at: <https://www.pjm.com/-/media/DotCom/documents/other-fed-state/20260716-order-202-26-35-exhibit-a-version-4.pdf>.

Consistent with FPA section 202(c)(3) and DOE's February 4, 2026 Order Granting Rehearing, PJM also requests that the emissions or other environmental impacts from, hours of operation of, and fuel burned by Specified Resources⁶ while any orders issued pursuant to this request are in effect will not be counted toward applicable 12-month or 30-day rolling average limitations.

The relief requested would allow PJM to operate the Specified Resources consistent with PJM's Governing Agreements and Good Utility Practice in order to maintain the reliability of the power grid in the PJM Region to meet the emergency and serve the public interest. This request is tailored to allow only the Specified Resources to exceed their Operating Limits as necessary, to ensure reliability during the limited timeframe and because of the anticipated system conditions described in this application.

In addition, allowing PJM to call upon its Transmission Owners to work with Electric Distribution Companies to communicate the Department's order that backup generation facilities at large loads operate so that those large loads can rely on power generated by backup generation facilities could help the RTO avoid residential load shed at EEA level 3. PJM notes that the Department previously issued orders permitting other regions, including PJM, to dispatch such generation under similar circumstances.⁷ PJM further requests that consistent with the provisions of Section 202(c) of the Federal Power Act, issuance of an order that allows use of backup generation by large loads notwithstanding any applicable environmental limitations under federal, state, or local law or regulation.

PJM does not lightly request this authorization. It understands the importance of the Operating Limits that are at issue. However, authorizing the Specified Resources to operate, notwithstanding their Operating Limits, under these reliability-based conditions will address what otherwise would be emergency conditions that threaten the provision of reliable electric service to the residents and businesses in the greater PJM Region.

Additional Commitments

In support of this application, PJM makes the following additional commitments:

Public Notifications

PJM will take reasonable measures to notify the following that the Department has issued to PJM an emergency order: (1) relevant state officials in PJM's region, and (2) PJM's Members. At a minimum, PJM will post and share a description of the order on its website (with a link to the order) and identify the name, municipality or other political subdivision where generating units dispatched under the requested order are located by posting Exhibit A.

⁶ PJM will only dispatch Specified Resources (as identified in Exhibit A) under this Order as needed to maintain reliability or in the event that any portion of the RTO is in an EEA 1.

⁷ See, e.g., Amended Order No. 202-26-01A (Jan. 25, 2026); Order No. 202-26-06 (Jan. 26, 2026); Order No. 202-26-07 (Jan. 26, 2026); Order No. 202-26-23 (May 18, 2026); Order No. 202-26-33 and -33A (June 30, 2026 and July 2, 2026); Order No. 202-26-35 (July 14, 2026); Order No. 202-26-41 (Sept. 1, 2026).

Reporting Notifications

PJM will provide a specific notification to the Department by email to AskCR@hq.doe.gov reporting if generating units have been dispatched and operated in reliance on the emergency order. PJM is also prepared to provide any additional information the Department may request through necessary collaboration with generation resource owners. PJM will promptly respond to any requests from the Department for additional information.

Coordination with Generation Owners

PJM is communicating its intention to seek this emergency authorization to the generation owners. At PJM's direction, the generation owners will operate Specified Resources to the maximum extent practicable in accordance with an emergency order issued by the Secretary, any federal, state, or local environmental law or regulation. Such action or omission shall not be considered a violation of such environmental law or regulation in accordance with and subject to FPA, section 202(c) (2), (3) and (4), and the terms of the Department order requested herein.

Conclusion

PJM appreciates the Department's expedited consideration of this request.

Respectfully Submitted,

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