



# **Order 2222 and Large Load Flexibility: What They Have in Common**

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# Order 2222: Flexibility Promised vs Flexibility Delivered

## Policy idea (2020)

- Aggregated DERs would provide flexible capacity at scale
- Markets opened to DERs across all RTOs
- Expected rapid participation

## Today (2026)

- PJM: ~290 MW aggregated DER capacity (PJM peak >160 GW)
- ISO-NE: ~20 MW aggregated solar + storage (ISO-NE peak >25 GW)

Participation <0.1% of system capacity

## Why?

- Distribution utilities retain operational control
- Reliability planning requires hard telemetry and verification
- Infrastructure and cost recovery unresolved
- ISOs added restrictions to manage risk

**Compliance occurred.**  
**Is there participation at scale?**

# What Order 2222 Teaches Us About Data Centers

## Today's challenge

- PJM load forecast: +30 GW data center demand by 2030
- Reliability margins tightening
- New generation and transmission slow to materialize

## Proposed solution

- Treat data centers as flexible loads (curtailment, behind-the-meter generation)

## Planning reality

- Grid planning assumes worst-case system stress
- Unless flexibility is **defined, measured, and enforceable**, planners must assume near-full load exposure

## What actually works

- **Defined service types**  
(maximum grid draw, firm curtailment obligations)
- **Verification infrastructure**  
telemetry, measurement, coordination
- **Clear cost allocation and regulatory authority**
- Flexibility can support operations.  
But **reliability planning still requires firm capacity.**

Order 2222 shows that verification moves more slowly than policy ambition  
It revealed that flexibility becomes real capacity only when institutions can verify it. The data center debate is now rediscovering the same constraint.