TO: The Honorable Philip C. Baten
Presiding Administrative Law Judge

Pursuant to Rule 212 and 2008 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), PJM Interconnection, L.L.C. (“PJM”), respectfully requests a one business day extension to Monday, February 23, 2015 to respond to the “Motion of Keryn Newman and Alison Haverty To Strike Portions of the Cross-Answering Testimony of Steven R. Herling” (“Motion to Strike”) and a two day extension until Wednesday, February 25, 2015 to respond to the Motion to Compel filed on behalf of the Intervenor State Agencies in the captioned docket. PJM has notified Ms. Newman and counsel on behalf of the Intervenor State Agencies of this request. Both Ms. Newman and counsel for the State Agencies have no objection to the requested extensions.

I. Background

On January 8, 2015, in accordance with the procedural schedule, Steven R. Herling filed cross-answering testimony on behalf of PJM in the captioned docket. On February 6, 2015, Ms. Newman and Ms. Haverty filed a motion to strike certain portions of the cross-answering testimony of Steven R. Herling of PJM. On February 18, 2015, the Intervenor State Agencies filed a Motion

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2 The Intervenor State Agencies include: (i) the Joint Consumer Advocates comprised of the Pennsylvania Office of Consumer Advocate, the Virginia Office of the Attorney General’s Division of Consumer Counsel, the Delaware Division of the Public Advocate and the Maryland Office of People’s Counsel; and (ii) the Indicated State Commissions comprised of the Maryland Public Service Commission and the Delaware Public Service Commission.
to Compel Responses from PJM relative to PJM’s response to data requests JCA-PJM-3.6 and 3.7. Intervenor Agencies requested an expedited hearing of five days after their motion was filed, or February 23, 2015.

PJM has been working diligently to respond to both motions. PJM counsel’s progress has been hampered by the fact that she broke her arm over the holiday weekend. Due to her absence from work two days this week and her heavy work load, she will be unable to timely respond without the requested extensions. Good cause exists to grant the motion for an extension of time because this request seeks an extension that is limited in scope and only as necessary to allow PJM to submit a more complete response to each motion.

II. Conclusion

WHEREFORE, for the reasons set forth herein, PJM respectfully requests that the extension requests be granted to allow PJM to submit its response to the Motion to Strike be Monday, February 23, 2015 and the Motion to Compel by Wednesday, February 25, 2015.

Respectfully submitted,

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Dated: February 20, 2015

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Counsel for
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Audubon, PA, this 20th day of February, 2015.

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