

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

)	
Calpine Corporation, Dynegy Inc.,)	
Eastern Generation, LLC, Homer City)	
Generation, L.P., NRG Power Marketing)	
LLC, GenOn Energy Management, LLC,)	
Carroll County Energy LLC,)	Docket No. EL16-49
C.P. Crane LLC, Essential Power, LLC,)	
Essential Power OPP, LLC, Essential)	
Power Rock Springs, LLC, Lakewood)	
Cogeneration, L.P., GDF SUEZ Energy)	
Marketing NA, Inc., Oregon Clean)	
Energy, LLC and Panda Power)	
Generation Infrastructure Fund, LLC)	
v.)	
PJM Interconnection, L.L.C.)	
)	
PJM Interconnection, L.L.C.)	ER18-1314-000
)	ER18-1314-001
)	
PJM Interconnection, L.L.C.)	EL18-178-000
)	(Consolidated)

ANSWER OF PJM INTERCONNECTION, L.L.C.

Pursuant to Rule 213 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) respectfully submits this answer (“Answer”) in support of the Organization of PJM States, Inc.’s (“OPSI”) motion for extension of filing deadline.² Specifically, PJM supports OPSI’s request that the Commission extend the deadline for filing testimony, evidence, and/or argument to October 11, 2018. In addition, it is appropriate to extend

¹ 18 C.F.R. §385.213.

² *Organization of PJM States, Inc., Motion for Extension of Filing Deadline*, Docket Nos. EL16-49-000, ER18-1314, and EL18-178-000 (filed July 27, 2018).

the deadline for filing reply testimony, evidence, and/or argument to November 28, 2018.³ In this response and through a separate waiver request to be subsequently filed, PJM proposes to delay the 2022/2023 Base Residual Auction (“BRA”) that was to be held in May 2019 and suggests dates for Commission action that would allow for an orderly conduct of the upcoming BRA.

I. PJM’s Support for OPSI’s Requested Extension.

Since the issuance of the Commission’s June 29, 2018 Order in this proceeding,⁴ PJM has worked diligently to develop a mechanism that will enable the implementation of a resource-specific fixed resource requirement alternative. As part of this process, through a series of public stakeholder meetings and postings, PJM is soliciting stakeholder input on a number of details needed to implement such an approach. Given the number of issues that need to be addressed in response to the Commission’s June 29 Order, the modest amount of additional time would be beneficial for preparing responsive filings.

II. PJM’s Proposed New Date for the 2019 BRA.

PJM acknowledges that an extension of the filing deadlines will require delaying the final order date to allow time for the Commission to adequately review all filings and replies, as well as issue an interim and subsequent final order. This would necessitate delaying the upcoming 2022/2023 BRA given the existing tariff imposed deadlines. Thus, PJM’s support of OPSI’s motion for an extension of the filing deadline is based on the expectation that the 2022/2023 BRA be delayed in order to accommodate the

³ While OPSI seeks to extend the deadline to file replies by November 26, 2018, PJM believes an extension that provides an additional two days beyond OPSI’s request is prudent given the holiday weekend immediately preceding this date.

⁴ PJM Interconnection, L.L.C., 163 FERC ¶ 61,236 (2018) (“June 29 Order”).

additional time. As a result, consistent with the Commission's June 29 Order, PJM intends to file a separate waiver request to delay the upcoming BRA and associated pre-BRA tariff imposed deadlines.⁵ In the waiver request, PJM anticipates requesting a delay of the 2022/2023 BRA to August 14, 2019. Such a waiver would be needed only upon the Commission granting OPSI's motion for extension of filing deadline.

III. Suggested Dates for Commission Action.

While there is generally no specific deadline for Commission action in a Section 206 proceeding, given the finding in the Commission's June 29 Order that the existing PJM tariff is unjust and unreasonable and the impracticability of issuing refunds to reverse settled auction results, it is important that any subsequent process in this docket occur in a timely manner while still allowing for meaningful Commission deliberation. Accordingly, PJM respectfully requests that the Commission:

- issue an initial order in this docket directing a compliance filing by PJM by January 15, 2019;
- direct PJM to submit any required compliance filing within thirty days of such order (*i.e.*, February 14, 2019) and
- issue a final order on compliance by March 15, 2019.

This proposed schedule will provide PJM and Capacity Market Sellers with approximately five months to undertake the tariff imposed obligations in advance of the delayed BRA. PJM believes Commission action on or close to the above dates will allow the 2019 BRA to proceed on August 14, 2019.

⁵ See *Id.*, P 173. PJM expects to file such a waiver request on August 13, 2018.

IV. Conclusion.

Based on the foregoing, the Commission should grant OPSI's motion for an extension of the filing deadlines and establish a new timeline consistent with the dates proposed above. In the meantime, PJM is committed to working with OPSI and all stakeholders to build consensus on a mechanism to implement a resource-specific fixed resource requirement alternative.

Respectfully submitted,



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Dated August 9, 2018

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, this 9th day of August, 2018.

/s/ Chen Lu
Chenchao Lu

Attorney for
PJM Interconnection, L.L.C.