

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

PJM Interconnection, L.L.C.

)
)

**Docket Nos. EL19-100-000
ER20-584-000**

**MOTION OF PJM INTERCONNECTION, L.L.C.
TO HOLD PROCEEDINGS IN ABEYANCE**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission’s (the “Commission”) Rules of Practice and Procedure,¹ and the Commission’s directives in its April 30, 2021 Order,² PJM Interconnection, L.L.C. (“PJM”) hereby submits this Motion to Hold Proceedings in Abeyance (the “Motion”). Specifically, PJM respectfully requests that the Commission hold the paper hearing in the above-captioned proceedings in abeyance, subject to the outcome of a Federal Power Act (“FPA”) section 205³ filing that PJM intends to submit on or before June 1, 2021, to implement a revised Effective Load Carrying Capability (“ELCC”) construct for determining the relative amount of capacity that variable, limited duration, and combination resources may offer in PJM’s capacity market (known as the “Reliability Pricing Model” or “RPM”) or provide in a Fixed Resource Requirement (“FRR”) capacity plan.

¹ 18 C.F.R. § 385.212.

² *PJM Interconnection, L.L.C.*, 175 FERC ¶ 61,084, at Ordering Para. (C) (2021) (the “April 30, 2021 Order”) (“PJM is hereby directed to submit its initial brief in Docket No. EL19-100-000 on or before June 1, 2021. The deadline to file responses to PJM’s initial brief will be June 22, 2021, and the deadline to file replies to those responses will be July 9, 2021. If PJM wishes to file a revised ELCC proposal pursuant to FPA section 205 on or before June 1, 2021, then PJM may move to hold the paper hearing in abeyance, and must, in that event, file such motion on or before May 14, 2021.”).

³ 16 U.S.C. 824d.

I. BACKGROUND

The Commission established the paper hearing in the above-captioned proceedings to investigate the justness and reasonableness of PJM’s rules for determining the capacity capability of all types of generating units in PJM. On April 10, 2020, the Commission held the paper hearing in abeyance to allow PJM and PJM stakeholders time to develop and file under FPA section 205 a revised approach for determining generation resources’ capacity capabilities.⁴ The Commission specified that it was holding the paper hearing “in further abeyance until Commission action on that filing.”⁵

On October 30, 2020, PJM submitted such an FPA section 205 filing to implement an ELCC approach that included, among other things, a “transition mechanism.”⁶ In the April 30, 2021 Order, the Commission rejected PJM’s October 30, 2020 Filing, finding the proposed transition mechanism to be unjust, unreasonable, and unduly discriminatory or preferential.⁷ The Commission explained that “[w]hile we reject the ELCC proposal because we find the proposed transition mechanism to be unjust and unreasonable and unduly discriminatory, we note that PJM’s ELCC framework, without the transition mechanism, appears to be a just and reasonable approach to determining the accredited capacity value of Variable Resources, Limited Duration Resources, and Combination Resources.”⁸

In rejecting PJM’s October 30, 2020 Filing, the Commission lifted the abeyance of the paper hearing in the above-captioned proceedings, and stated that “[i]f PJM wishes to file a revised

⁴ *PJM Interconnection, L.L.C.*, 171 FERC ¶ 61,015, at PP 34-35 (2020).

⁵ *Id.* at P 35.

⁶ *PJM Interconnection, L.L.C.*, Effective Load Carrying Capability Construct Tariff Filing of PJM Interconnection, L.L.C., Docket No. ER21-278-000 (Oct. 30, 2020) (the “October 30, 2020 Filing”).

⁷ April 30, 2021 Order at P 17.

⁸ *Id.*

ELCC proposal pursuant to FPA section 205 on or before June 1, 2021, then PJM may move to hold the paper hearing in abeyance, and must, in that event, file such motion on or before May 14, 2021.”⁹

II. MOTION TO HOLD PROCEEDINGS IN ABEYANCE

In accordance with the Commission’s directives in the April 30, 2021 Order, PJM hereby informs the Commission of its intent to submit a revised ELCC proposal through a new FPA section 205 filing, on or before June 1, 2021, and accordingly moves to hold the paper hearing in the above-captioned proceedings in abeyance, subject to the outcome of the aforementioned FPA section 205 filing. Good cause exists to grant this Motion, as the revised ELCC approach that PJM intends to submit on or before June 1, 2021, will obviate the need for the paper hearing in the above-captioned proceedings.

⁹ *Id.* at P 18.

III. CONCLUSION

In accordance with the foregoing, PJM respectfully requests that the Commission grant this Motion, and hold the paper hearing in the above-captioned proceedings in abeyance, subject to the outcome of the FPA section 205 filing that PJM intends to make on or before June 1, 2021.

Respectfully submitted,

/s/ Thomas DeVita

Craig Glazer
Vice President – Federal Government Policy
PJM Interconnection, L.L.C.
1200 G Street, N.W.
Suite 600
Washington, D.C. 20005
(202) 423-4743
Craig.Glazer@pjm.com

Thomas DeVita
Senior Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403
(610) 635-3042
Thomas.DeVita@pjm.com

Paul M. Flynn
Ryan J. Collins
Wright & Talisman, P.C.
1200 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 393-1200 (phone)
(202) 393-1240 (fax)
flynn@wrightlaw.com
collins@wrightlaw.com

*On behalf of
PJM Interconnection, L.L.C.*

May 14, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this 14th day of May 2021 caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Thomas DeVita

Thomas DeVita

Senior Counsel

PJM Interconnection, L.L.C.

2750 Monroe Boulevard

Audubon, PA 19403

(610) 635-3042

Thomas.DeVita@pjm.com