

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

PJM Interconnection, L.L.C.

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Docket No. ER22-962-005

**MOTION FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING
OF PJM INTERCONNECTION, L.L.C.**

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) respectfully moves for an extension of time to submit its compliance filing directed by the Commission’s July 25, 2024 Order² in the above-captioned proceeding, related to PJM’s compliance with Order No. 2222.³ As discussed herein, given the nature of some of the directives contained within the July 25, 2024 Order and the corresponding need to confer and coordinate with PJM stakeholders, PJM respectfully requests a 60-day extension of time to submit its compliance filing, from the current date of August 26, 2024 to October 23, 2024.

I. BACKGROUND

In the July 25, 2024 Order, the Commission accepted PJM’s September 1, 2023 Order No. 2222 Compliance Filing, subject to further compliance.⁴ As relevant here, the Commission in Ordering Paragraph (B) directed PJM to submit its compliance filing within 30 days (by August 26, 2024), on the wide range of directives.

¹ 18 C.F.R. §§ 385.212, 385.2008.

² *PJM Interconnection, L.L.C.*, 188 FERC ¶ 61,076 (2024) (hereafter, the “July 25, 2024 Order”).

³ *Participation of Distributed Energy Res. Aggregations in Mkts. Operated by Reg’l Transmission Orgs. & Indep. Sys. Operators*, 172 FERC ¶ 61,247 (2020) (“Order No. 2222”), *order on reh’g*, 174 FERC ¶ 61,197 (“Order No. 2222-A”), *order on reh’g*, 175 FERC ¶ 61,227 (2021) (“Order No. 2222-B”).

⁴ *PJM Interconnection, L.L.C.*, Compliance Filing of PJM Interconnection, L.L.C., Docket No. ER22-962-005 (September 1, 2023) (hereafter, the “September 1, 2023 Order No. 2222 Compliance Filing”).

II. MOTION FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING

PJM respectfully requests a 60-day extension of time to submit its compliance filing, from the current date of August 26, 2024 to October 23, 2024.

Under Rule 2008, “the time by which any person is required or allowed to act under any statute, rule, or order may be extended by the decisional authority for good cause, upon a motion made before the expiration of the period prescribed or previously extended.”⁵ PJM submits that good cause exists to grant the requested extension in this circumstance, for the following four reasons.

First, additional time beyond the current date of August 26, 2024 will afford PJM critical opportunities to engage with its stakeholders and receive their feedback on the directives of the July 25, 2024 Order. For example, the directive to further develop “a process for ongoing coordination, including operational coordination, that addresses data flows and communication between PJM and the EDC,”⁶ will require significant interface with PJM’s EDC working group and other stakeholders through the PJM Distributed Resources Subcommittee (“DISRS”). Stakeholder engagement has been a cornerstone of PJM’s Order No. 2222 compliance approach from its inception in October 2020, and an additional 60 days will allow PJM to hold the necessary meetings to engage with PJM stakeholders on these issues.

Second, additional stakeholder engagement and vetting will permit PJM to submit a more comprehensive compliance filing, which will correspondingly provide a more complete record upon which the Commission can base its decision in this proceeding. In the absence of sufficient time to engage with stakeholders and receive their feedback for incorporation into PJM’s compliance filing, this feedback would by default be entered into the docket *after* PJM’s

⁵ 18 C.F.R. § 385.2008(a).

⁶ July 25, 2024 Order at P 171.

submission, via comments in support, protests, and responsive pleadings. Granting the requested extension will therefore enhance administrative efficiency by identifying and addressing intervenor perspectives, to the extent possible, *prior* to the submission of PJM’s next compliance filing.

Third, no party will be prejudiced by granting the requested extension. This is because: (i) as a Federal Power Act section 206⁷ proceeding, the Commission is not statutorily required to act on PJM’s compliance filing in this docket by a specific date; (ii) under Rule 213, all parties are procedurally permitted to file responsive pleadings to PJM’s submission,⁸ irrespective of whether PJM files on August 26, 2024 or October 23, 2024; and (iii) October 23, 2024 is still years away from expected implementation of Order No. 2222 in the PJM Region.

Fourth, the Commission has previously found good cause to grant extensions of compliance deadlines for RTOs/ISOs in rulemakings, specifically when such extensions will permit additional stakeholder engagement. This has been true both in this specific rulemaking,⁹

⁷ 16 U.S.C. § 824e.

⁸ *See* 18 C.F.R. § 385.213(a)(2), (3) (“An answer may not be made to a protest, an answer, a motion for oral argument, or a request for rehearing, unless otherwise ordered by the decisional authority. A presiding officer may prohibit an answer to a motion for interlocutory appeal. If an answer is not otherwise permitted under this paragraph, no responsive pleading may be made An answer may be made to any pleading, if not prohibited under paragraph (a)(2) of this section.”).

⁹ *See, e.g., Midcontinent Indep. Sys. Operator, Inc.*, 175 FERC ¶ 61,013, at P 5 (2021) (“We grant MISO’s, SPP’s, and PJM’s requests for extension, until April 18, 2022, April 28, 2022, and February 1, 2022, respectively, to submit their filings in compliance with the requirements of Order No. 2222”); *PJM Interconnection, L.L.C.*, Notice of Extension of Time, Docket No. ER22-962-001 (April 11, 2023) (“Upon consideration, notice is hereby given that PJM’s motion for a 120-day extension of time to and including September 1, 2023, to submit its compliance filing as directed by the March 1 Order is granted.”).

and in other rulemaking proceedings.¹⁰ Granting this motion would be consistent with this prior practice.

¹⁰ See, e.g., *Demand Response Compensation in Organized Wholesale Energy Markets*, Notice of Extension of Time, Docket No. RM10-17-000 (Jul. 8, 2011) (“ISO-NE states that the extension of time will allow further consideration by stakeholders of ISO-NE’s proposed tariff changes to its demand response program . . . Upon consideration, notice is hereby given that ISO-NE is granted an extension of time to and including August 19, 2011, to submit its compliance filing pursuant to Order No. 745.”); *Demand Response Compensation in Organized Wholesale Energy Markets*, Notice of Extension of Time, Docket No. RM10-17-000 (Jul. 11, 2011) (“MISO states that the extension of time will allow further discussion and consideration by stakeholders of MISO’s proposed compliance filing . . . Upon consideration, notice is hereby given that MISO is granted an extension of time to and including August 19, 2011, to submit its compliance filing pursuant to Order No. 745.”); *Demand Response Compensation in Organized Wholesale Energy Markets*, Notice of Extension of Time, Docket No. RM10-17-000 (Jul. 22, 2011) (“The NYISO states that additional time is needed to conduct analysis related to issues raised at a July 18th Market Issues Work Group meeting and to respond to any additional stakeholder concerns . . . Upon consideration, notice is hereby given that NYISO is granted an extension of time to and including August 19, 2011, to submit its compliance filing pursuant to Order No. 745.”); *Offer Caps in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Notice of Extension of Time, Docket No. RM16-5-000 (Jul. 17, 2018) (“CAISO asserts that this additional time will also allow for stakeholder consideration and approval from its Board of Governors . . . Upon consideration, notice is hereby given that CAISO’s motion is granted, extending the deadline for CAISO to comply with the Final Rule to and including April 30, 2019.”); *Integration of Variable Energy Resources*, Notice of Extension of Time, Docket No. RM10-11-000 (Oct. 18, 2013) (“CAISO states that the additional time is needed to obtain additional stakeholder input on the proposed revisions to its tariff, and to finalize the supporting materials . . . Upon consideration, CAISO is hereby granted an extension of time, to and including November 27, 2013, to submit a compliance filing.”); *PJM Interconnection, L.L.C.*, Notice of Extension of Time, Docket No. RM10-23-000 (Oct. 15, 2012) (“PJM states that the requested extension will permit PJM sufficient time to finalize the stakeholder process and related compliance activities . . . Upon consideration, notice is hereby given that PJM is granted an extension of time to and including October 25, 2012, to submit its filing to comply with Order No. 1000.”); *Credit Reform in Organized Wholesale Markets*, Notice of Extension of Time, Docket No. RM10-13-000 (Jan. 24, 2012) (“Upon consideration, notice is hereby given that all RTOs and ISOs are granted an extension of time to and including April 30, 2012, to comply with requirement of Order No. 741 that RTOs and ISOs enhance their ability to offset market obligations in bankruptcy.”); *Standardization of Small Interconnection Agreements and Procedures*, Notice of Extension of Time, Docket No. RM02-12-000 (Nov. 4, 2005) (“The motion states that the CAISO requires additional time to incorporate stakeholder input in developing the SGIP and SGIA compliance filings. CAISO further states that the press of the other stakeholder initiatives has delayed the development of a stakeholder process focusing on these SGIP and SGIA compliance filings . . . Upon consideration, notice is hereby given that an extension of time for the CAISO to make SGIP and SGIA compliance filings is granted to and including February 10, 2006, as requested by the CAISO.”).

III. CONCLUSION

In accordance with the foregoing, PJM respectfully requests that the Commission grant this motion, as discussed herein.

Respectfully submitted,

/s/ Thomas DeVita

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

July 30, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of July, 2024 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
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