

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

Hummingbird Energy LLC ) Docket No. ER24-3006-000

**JOINT MOTION OF HUMMINGBIRD ENERGY LLC  
AND PJM INTERCONNECTION, L.L.C. TO CONTINUE TO HOLD  
PROCEEDING IN ABEYANCE AND REQUEST FOR EXPEDITED  
TREATMENT**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),<sup>1</sup> Hummingbird Energy LLC (“Hummingbird”) and PJM Interconnection, L.L.C. (“PJM”) submit this motion requesting that the Commission: (1) continue to hold the captioned proceeding in abeyance and defer any action on the waiver request filed in the captioned proceeding by Hummingbird on September 6, 2024,<sup>2</sup> until November 8, 2024; and (2) grant expedited treatment for this motion.

**I. MOTION TO CONTINUE TO HOLD THE WAIVER REQUEST  
PROCEEDING IN ABEYANCE**

Following submission of the Waiver Request, Hummingbird and PJM commenced discussion of potential avenues to resolve the issues raised in the Waiver Request. On September 20, 2024, Hummingbird and PJM filed a joint motion requesting that the

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<sup>1</sup> 18 C.F.R. § 385.212.

<sup>2</sup> *Hummingbird Energy LLC*, Request for Limited Waiver of Hummingbird Energy LLC, Docket No. ER24-3006-000 (Sept. 6, 2024) (“Waiver Request”).

Commission hold this proceeding in abeyance until October 21, 2024.<sup>3</sup> The Commission granted this request in a notice issued on September 26, 2024.<sup>4</sup>

## **II. REQUEST FOR EXPEDITED TREATMENT AND WAIVERS**

PJM and Hummingbird continue to communicate and work to resolve the issues between them. Hummingbird and PJM respectfully request expedited treatment of this motion and that the Commission issue an order holding the Waiver Request proceeding in abeyance for an additional 18 days, until November 8, 2024. Hummingbird and PJM further request waiver of any Commission rules and regulations as necessary for the Commission to grant the relief requested in this motion.

Good cause therefore exists for the Commission to continue to hold the Waiver Request proceeding in abeyance until November 8, 2024, because doing so would permit Hummingbird and PJM time to work toward resolution of the issues raised in the Waiver Request without the need for further proceedings before the Commission.

## **III. CONCLUSION**

For the reasons set forth in this motion, Hummingbird and PJM respectfully request that the grant this motion no later than October 21, 2024.

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<sup>3</sup> *Hummingbird Energy LLC*, Joint Motion of Hummingbird Energy LLC and PJM Interconnection, L.L.C. to Hold Proceeding in Abeyance and Request for Expedited Treatment, Docket No. ER24-3006-000 (Sept. 20, 2024).

<sup>4</sup> *Hummingbird Energy LLC*, Notice Granting Motion to Hold Proceeding in Abeyance and Extending Comment Period, Docket No. ER24-3006-000 (Sept. 26, 2024).

Respectfully submitted,

/s/ Wendy B. Warren

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***Counsel for Hummingbird Energy LLC***

Dated: October 18, 2024

## **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 Washington, D.C., this 18th day of October 2024.

/s/ David S. Berman  
***Attorney for PJM Interconnection,  
L.L.C.***