

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

**Affirmed Energy LLC**

**v.**

**PJM Interconnection, L.L.C.**

**Docket No. EL24-124**

**CORRECTED JOINT MOTION TO EXTEND STAY**

On July 15, 2024, PJM Interconnection, L.L.C. (PJM) and Affirmed Energy LLC (Affirmed) filed a joint motion in the above-captioned proceeding requesting that the Commission stay the proceeding to and including September 30, 2024 and extend the period for answers to the complaint in the above-captioned proceeding from July 19, 2024 to and including October 30, 2024. The Commission granted that extension on July 18, 2024. Under the July 18 notice, answers and interventions in response to Affirmed’s complaint are due October 30, 2024. Pursuant to Rule 212 of the Federal Energy Regulatory Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.212, PJM Interconnection, L.L.C. (“PJM”) and Affirmed Energy LLC respectfully request that the Commission grant a short extension of the current deadline for answers and comments in this proceeding until Monday, November 11, 2024.<sup>1</sup>

PJM and Affirmed are continuing to engage in discussions over the status of PJM’s withholding of Affirmed’s collateral, the subject of Affirmed’s complaint. To

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<sup>1</sup> This corrected motion fixes an error in the joint motion filed by these parties on October 28, 2024.

ensure the parties can continue these negotiations, and in light of the looming October 30 deadline, PJM and Affirmed jointly request a short extension of the answer and comment deadline until November 11, 2024. Allowing these parties a modest extension of the stay currently in place will increase the likelihood that the parties can resolve their dispute, thereby obviating the need for the Commission to expend valuable resources to resolve this proceeding. Moreover, a short extension of the stay will not prejudice any party to this proceeding. Good cause thus exists for this short extension of the October 30 deadline for answers and comments.

Respectfully submitted,

/s/ John Lee Shepherd, Jr.  
John Lee Shepherd, Jr.  
Hunton Andrews Kurth LLP  
2200 Pennsylvania Ave, NW  
Suite 900  
Washington, DC 20037  
(202) 955-1500  
jshepherd@hunton.com

*Counsel for PJM Interconnection, L.L.C.*

/s/ Anand Viswanathan  
Anand Viswanathan  
Jenner & Block LLP  
1099 New York Avenue, NW  
Suite 900  
Washington, DC 20001-4412  
(202) 639-6044  
aviswanathan@jenner.com

*Counsel for Affirmed Energy LLC*

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing to be served upon the parties on the official service list maintained by the Secretary in this proceeding.

Dated at Washington, D.C., this 29th day of October 2024.

/s/ Anand Viswanathan

Anand Viswanathan

Jenner & Block LLP

1099 New York Ave NW #900

Washington, DC 20001

(202) 639-6044

aviswanathan@jenner.com