

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

Big Shoulders Storage LLC)	
Complainant,)	
)	
v.)	Docket No. EL24-141-000
)	
PJM Interconnection, L.L.C.)	
Respondent.)	

**JOINT MOTION TO DISMISS COMPLAINT AND STIPULATED
SATISFACTION AGREEMENT OF PJM INTERCONNECTION, L.L.C. AND
BIG SHOULDERS STORAGE LLC**

Pursuant to Rule 206(j) of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) and Big Shoulders Storage LLC (“BSS”) respectfully submit this joint motion to dismiss and stipulated agreement to withdraw the complaint in the captioned proceeding.² PJM and BSS request that the Commission accept this stipulated agreement without condition and issue an ordering dismissing the Complaint with prejudice. In accordance with Rule 206(j), PJM and BSS represent that the underlying Complaint will be satisfied through the Commission’s acceptance of the stipulated withdrawal agreement specified below.

I. STIPULATED SATISFACTION AND WITHDRAWAL AGREEMENT

In resolving the Complaint and requesting that the Commission dismiss the complaint with prejudice, PJM and BSS agree and stipulate as follows:

¹ 18 C.F.R. § 385.206.

² *Big Shoulders Storage LLC v. PJM Interconnection, L.L.C.*, Complaint of Big Shoulders Storage LLC, Requesting Fast Track Processing and Shortened Comment Period, Docket No. EL24-141-000 (Sept. 20, 2024) (“Complaint”). This stipulated withdrawal agreement also resolves the issues pending between PJM and BSS in BSS’s related waiver request filed in *Big Shoulders Storage LLC*, Request for Limited Waiver, Expedited Action, and Shortened Comment Period of Big Shoulders Storage LLC, Docket No. ER24-2698-000 (Aug. 2, 2024). Accordingly, upon a Commission order granting this complaint, the Commission may dismiss BSS’s related waiver request as moot.

- 1) PJM will refund any remaining deposits and payments made by BSS for Transition Cycle #1;
- 2) BSS will be allowed to submit its reinstated Interconnection Request by application duly submitted by the close of the Transition Cycle #2 application window, which opened on June 21, 2024, and will close on December 17, 2024;
- 3) If the Commission grants this Motion and BSS meets all the requirements of Part VII of the PJM Open Access Transmission Tariff for applications in Transition Cycle #2, including but not limited to all the forms, information, modeling data, site control evidence and financial security, study deposits, and readiness payments required for projects in Transition Cycle #2, by the application deadline for that cycle, PJM will study BSS's project in Transition Cycle #2; provided, however, that PJM makes no guarantee of the outcome of that study.

II. CONCLUSION

Based on the stipulated agreement described above, PJM and BSS request that the Commission accept this stipulation without condition and dismiss the underlying complaint with prejudice. PJM and BSS also request expedited action on this motion, by December 2, 2024, or as soon thereafter as possible, to provide certainty as to the resolution of this proceeding.³

Respectfully submitted,

Craig Glazer

/s/ Wendy B. Warren
Wendy B. Warren

³ To the extent the Commission deems it necessary, PJM and BSS request waiver of any PJM tariff provisions necessary to facilitate the relief requested in this motion.

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Counsel to Big Shoulders Storage LLC

Dated: November 4, 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 4th day of November 2024.

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