

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

Joint Consumer Advocates)	
)	
v.)	Docket No. EL25-18-000
)	
PJM Interconnection, L.L.C.)	
)	

**ANSWER OF PJM INTERCONNECTION, L.L.C.
TO THE ANSWER OF THE JOINT CONSUMER ADVOCATES
IN OPPOSITION TO MOTION FOR EXTENSION OF TIME**

PJM Interconnection, L.L.C. (“PJM”), pursuant to Federal Energy Regulatory Commission (“Commission” or “FERC”) Rules of Practice and Procedure 212 and 213,¹ submits this Motion for Leave to Answer and Answer to the answer of the Joint Consumer Advocates’² opposition to the requested motion for extension of time to answer the underlying complaint.³ For the reasons set forth below, the Commission should grant the requested 45-day extension of time to answer the Joint Consumer Advocates’ complaint.

I. MOTION FOR LEAVE TO ANSWER

The Commission’s rules provide that a party may answer comments where the decisional authority permits the answer for good cause shown. The Commission has accepted responses to comments and protests when doing so will ensure a more accurate and complete record or will assist the Commission in its deliberative process by clarifying the issues.⁴ All of these criteria are

¹ 18 C.F.R. §§ 385.212 and 385.213.

² The Joint Consumer Advocates are the Illinois Attorney General’s Office, Illinois Citizens Utility Board, Maryland Office of People’s Counsel, New Jersey Division of Rate Counsel, Office of the Ohio Consumer’s Counsel, and Office of the People’s Counsel for the District of Columbia (the “Joint Consumer Advocates”).

³ *Joint Consumer Advocates v. PJM*, Answer of the Joint Consumer Advocates in Opposition to PJM’s Motion for Extension of Time, Docket No. EL25-18-000 (Nov. 26, 2024) (“Joint Consumer Advocates’ Answer”).

⁴ The Commission regularly allows answers in such cases. *See, e.g., PJM Interconnection, L.L.C.*, 139 FERC ¶ 61,165, at P 24 (2012) (accepting answers to a protest because “they have provided information that assisted [the Commission] in [its] decision-making process”); *Cal. Indep. Sys. Operator Corp.*, 129 FERC ¶ 61,241, at P 16 (2009) (“[w]e will

met. Therefore, PJM respectfully requests that the Commission grant its Motion because the Answer will help clarify the record and contribute to an understanding of the issues.

II. ANSWER

The Joint Consumer Advocates' Answer agrees to a two-week extension of time, until December 23, 2024, to submit answers to the underlying complaint, but protests the requested 45-day extension of time "unless PJM agrees to an effective date for its upcoming section 205 filing later than February 15, 2025."⁵ Separately, after PJM requested the extension of time to answer this complaint, the PJM Power Providers Group ("P3") and the Electric Power Supply Association ("EPSA") filed a separate motion to dismiss,⁶ which PJM supports.⁷ That motion to dismiss, without prejudice, requests Commission action by December 16, 2024. Given the pending motion to dismiss, it would not be productive for PJM to prepare an answer to the underlying complaint before the Commission issues an order on that motion, especially while PJM is in the midst of preparing for the upcoming section 205 filings that will propose amendments to certain capacity market and interconnection process rules.

Regardless, to accommodate the Joint Consumer Advocates' agreement to the requested 45-day extension of time, PJM can commit to seek an effective date that will be later than February

accept the answers and responses to the requests for rehearing because they provide information that assisted us in our decision-making process"); *PJM Interconnection, L.L.C.*, 104 FERC ¶ 61,031, at P 10 (2003) (accepting answer because "it will not delay the proceeding, will assist the Commission in understanding the issues raised, and will [e]nsure a complete record upon which the Commission may act"); *KN Wattenberg Transmission LLC*, 94 FERC ¶ 61,189, at 6 (2001) (finding good cause to accept an answer to a request for rehearing "in order to insure a complete record in this proceeding"); *Tex. E. Transmission, LP*, 131 FERC ¶ 61,164, at P 1, n.3 (2010) (accepting answer to a request for rehearing that aided the Commission's decision-making); *Southwest Power Pool, Inc.*, 126 FERC ¶ 61,153, at P 18 (2009) (accepting answers that aided the Commission's decision-making).

⁵ Joint Consumer Advocates' Answer at 2.

⁶ *Joint Consumer Advocates v. PJM*, Motion of the PJM Power Providers Group and the Electric Power Supply Association for Dismissal, Without Prejudice, and Requested for Expedited Action and a Shortened Comment Answer Period, Docket No. EL25-18-000 (Nov. 26, 2024) ("EPSA and P3 Motion").

⁷ PJM will submit a separate answer in support of the EPSA and P3 Motion.

15, 2025 for the substantive capacity market changes contained in the forthcoming section 205 filing.⁸ As a result, the Commission should grant PJM’s originally requested motion for extension of time to answer the underlying complaint to January 23, 2025.

III. CONCLUSION

Based on the foregoing, the Commission should grant PJM’s motion for a 45-day extension of time to the current answer deadline and set the updated comment deadline to January 23, 2025.

Respectfully submitted,

/s/ Chenchao Lu

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

Chenchao Lu
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403
(610) 666-2255
Chenchao.Lu@pjm.com

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

⁸ If the Commission grants PJM’s motion to extend the deadline to file answers to the underlying complaint to January 23, 2025, then PJM would seek an effective date on the substantive capacity market changes that is after February 15, 2025, but not significantly later to avoid any further delay of the currently posted auction schedule.

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 Audubon, PA this 2nd day of December 2024.

/s/ Jesse Jacobs

Jesse Jacobs
Sr. Legal Operations Analyst I
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403
(610) 666-2255
Jesse.Jacobs@pjm.com