

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

American Clean Power Association)	
Solar Energy Industries Association)	
Advanced Energy United,)	
)	
Complainants,)	
)	
v.)	Docket No. EL25-22-000
)	
PJM Interconnection, L.L.C.,)	
)	
Respondent.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME AND REQUEST FOR
WAIVER OF ANSWER PERIOD AND EXPEDITED RULING
OF PJM INTERCONNECTION, L.L.C.**

PJM Interconnection, L.L.C. (“PJM”), pursuant to Rules 212 and 2008(a) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),¹ respectfully requests a twenty-five day extension of time, until January 10, 2025, to answer the Complaint filed by American Clean Power Association, Solar Energy Industries Association, and Advanced Energy United (“Complainants”) against PJM in the captioned proceeding.² PJM is authorized to state that Complainants do not oppose this motion.

In light of Complainants’ non-opposition, PJM further requests that the Commission waive the answer period for this motion and grant PJM’s extension request

¹ 18 C.F.R. §§ 385.212, 385.2008(a).

² *Am. Clean Power Ass’n v. PJM Interconnection, L.L.C.*, Complaint and Request for Fast Track Processing of American Clean Power Association, Solar Energy Industries Association, and Advanced Energy United, Docket No. EL25-22-000 (Nov. 26, 2024) (“Complaint”). Pursuant to the Commission’s November 27, 2024 Notice in this proceeding, PJM’s answer to the Complaint currently is due on December 16, 2024.

as expeditiously as possible, but no later than December 10, 2024. There is good cause for the Commission to approve the requested extension of the current deadline, as set forth below.

I. MOTION FOR EXTENSION AND REQUEST FOR WAIVER AND EXPEDITED ACTION

The Complaint concerns PJM’s guidance, provided through stakeholder presentations, regarding interpretation of the “adjacent parcels” requirement for Project Developers to demonstrate Site Control.³ Complainants contend that the provided guidance is inconsistent with Complainants’ interpretation of the Tariff and implementation details set forth in PJM Manual 14H, section 7.2.2,⁴ and is further inconsistent with the “underlying intent” of the Commission’s recent rulemaking in Order Nos. 2023 and 2023-A.⁵

The Commission’s notice of the Complaint directed PJM, as the respondent, to file an answer by December 16, 2024. PJM respectfully requests that the Commission extend this deadline by twenty-five days, to January 10, 2025.

Good cause exists for the requested extension of time. The Complaint raises serious allegations regarding PJM’s implementation of the Tariff with respect to its interpretation of the requirements necessary to demonstrate Site Control during each Decision Point of a Cycle.⁶ As such, the Complaint warrants PJM’s careful consideration

³ Complaint at 6-9 (citing Tariff, Part VI, Subpart D, section 309(A)(1)(b)). Terms not otherwise defined herein shall have the meaning set forth in the PJM Open Access Transmission Tariff (“Tariff”).

⁴ Complaint at 16-17.

⁵ *Id.* at 18-23 (citing *Improvements to Generator Interconnection Procedures and Agreements*, Order No. 2023, 184 FERC ¶ 61,054, at P 583, *limited order on reh’g*, 185 FERC ¶ 61,063 (2023), *order on reh’g & clarification*, Order No. 2023-A, 186 FERC ¶ 61,199 (2024), *appeals pending*, Petition for Review, *Advanced Energy United v. FERC*, Nos. 23-1282, et al. (D.C. Cir. Oct. 6, 2023)).

⁶ *See id.* at 11-17.

and response. The requested extension will provide PJM adequate time to look into the Complaint's allegations thoroughly and prepare its response to the Complaint, and will facilitate the development of a robust record on which the Commission can render a decision. The requested, modest, twenty-five-day extension of time will not prejudice Complainant or any other party to the proceeding, or otherwise unduly delay resolution of the issues raised in the Complaint.

PJM respectfully requests that the Commission: (i) grant PJM's unopposed request to extend the answer to the Complaint from December 16, 2024, to January 10, 2025; (ii) waive the five-day period for answers to this motion since Complainants do not oppose it; and (iii) issue an order as soon as practicable but no later than December 10, 2024. Good cause exists for waiving the answer period and taking expedited action, as waiving comments and issuing an order no later than December 10, 2024, will provide PJM and other interested parties with certainty regarding the time allowed to develop comprehensive responses to the Complaint.

II. CONCLUSION

For the reasons stated above, PJM respectfully requests that the Commission (i) grant PJM's request to extend the time to answer the Complaint, from December 16, 2024, to January 10, 2025; (ii) waive the five-day period for answers to this motion; and (iii) issue an order granting the relief requested in this motion no later than December 10, 2024.

Respectfully submitted,

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

December 2, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on each person designated on the service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 2nd day of December 2024.

/s/ Elizabeth P. Trinkle

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