

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

DC Energy, LLC)	
DC Energy Mid-Atlantic, LLC)	
Complainant,)	
)	
v.)	Docket No. EL12-8-000
)	
PJM Interconnection, L.L.C.)	
Respondent.)	

**UNOPPOSED MOTION OF
PJM INTERCONNECTION, L.L.C.
FOR EXTENSION OF TIME TO FILE ANSWER
AND INTERVENTIONS**

EXPEDITED ACTION REQUESTED

Pursuant to Rules 212 and 2008 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008, PJM Interconnection, L.L.C. ("PJM"), with the consent of the complainants, DC Energy, LLC and DC Energy Mid-Atlantic, LLC (collectively "DC Energy Companies"), moves to extend, to December 2, 2011, the date for the filing of PJM's answer to DC Energy Companies' complaint ("Complaint") filed on October 27, 2011 and all interventions and other comments.

MOTION

On October 27, 2011, DC Energy Companies filed the Complaint concerning PJM's planned billing of Balancing Operating Reserve charges relating to certain DC Energy Companies' transactions. The Commission has directed that any response to the Complaint be filed by November 16, 2011.

PJM requests an extension of the answer, intervention, and comment date to and including December 2, 2011. Good cause exists to grant PJM's requested extension. The Complaint runs 68 pages and also contains several lengthy affidavits and attachments. Although PJM has been working diligently to prepare its answer to the Complaint, it has concluded that an extension of the current answer date is required to ensure that PJM's answer fully and effectively contributes to the record on which the Commission will resolve the issues in this proceeding.

The requested 16-day extension will not prejudice DC Energy Companies or any other interested party and should not materially affect the Commission's processing of the Complaint. On November 4, 2011, the Commission issued an order granting PJM's request for a limited waiver of certain sections of the PJM Open Access Transmission Tariff and the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. in order to suspend rebilling and associated payment obligations pending the issuance of a Commission order on the substantive issues raised in this proceeding.¹ Therefore, any short delay that the extension might produce will not harm DC Energy Companies.

PJM is authorized to state that the DC Energy Companies do not object to the requested extension of time for PJM's answer. Thus, PJM requests that the Commission act on this motion expeditiously without awaiting the filing of answers.

¹ PJM Interconnection, L.L.C., 137 FERC ¶ 61,109 (2011).

CONCLUSION

For the foregoing reasons, PJM requests that the Commission expeditiously grant its request for an extension of time for the filing of answers, interventions, and comments to and including December 2, 2011.

Respectfully submitted,

/s/ Deborah C. Brentani

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Dated: November 8, 2011

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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 8th day of November, 2011.

/s/ Deborah C. Brentani

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