

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

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

**UNOPPOSED MOTION OF PJM INTERCONNECTION, L.L.C. TO HOLD
PROCEEDING IN ABEYANCE AND REQUEST FOR EXPEDITED
TREATMENT**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),¹ PJM Interconnection, L.L.C. submits this motion (“Motion”) requesting that the Commission: (1) hold the captioned proceeding in abeyance for a period of 31 days, until February 10, 2025; (2) grant expedited treatment, by acting on the Motion on or by December 30, 2024; and (3) commensurate with this request for expedited treatment, grant a shortened answer period for the Motion of one day, such that answers to the Motion would be due on or by December 27, 2024. PJM is authorized to state that American Clean Power Association, Solar Energy Industries Association, and Advanced Energy United (“Complainants”) do not oppose this motion.

¹ 18 C.F.R. § 385.212 (2024).

I. BACKGROUND

The Complaint² in this proceeding concerns PJM’s guidance, provided through stakeholder presentations, regarding interpretation of the “adjacent parcels” requirement for Project Developers to demonstrate Site Control.³ On December 2, 2024, PJM filed an unopposed request for extension of time to answer the Complaint. The Commission issued a Notice of Extension of Time on December 10, 2024, setting January 10, 2025, as the deadline for filing answers, interventions, and comments in this proceeding.⁴ Complainants and PJM subsequently commenced discussions as to a non-litigated resolution of the issues in this proceeding that would achieve a mutually satisfactory outcome of all proceedings and conserve Commission and party resources.

II. MOTION TO HOLD THE COMPLAINT PROCEEDING IN ABEYANCE

PJM and Complainants continue to communicate and work to resolve the issues underlying the Complaint. Accordingly, PJM respectfully requests that the Commission hold this proceeding in abeyance for 31 days, until February 10, 2025. PJM and Complainants desire to continue their discussion of potential avenues to resolve the issues raised in the Complaint and seek additional time to do so.

Good cause therefore exists for the Commission to hold the Complaint proceeding in abeyance until February 10, 2025, because doing so would permit PJM and

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”).

³ Complaint at 6-10 (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 *Am. Clean Power Ass’n v. PJM Interconnection, L.L.C.*, Notice of Extension of Time, Docket No. EL22-25-000 (Dec. 10, 2024).

Complainants additional time to work towards resolving the issues raised in the Complaint without the need for further proceedings before the Commission.

III. REQUESTS FOR EXPEDITED TREATMENT, SHORTENED COMMENT PERIOD AND WAIVERS

PJM respectfully requests expedited treatment on this Motion, such that the Commission issue an order granting this Motion no later than December 30, 2024. Commensurate with this request for expedited treatment, PJM also requests that the Commission grant a shortened answer period for this Motion of one day, such that answers to the Motion would be due on or by December 27, 2024. PJM further requests waiver of any Commission rules and regulations as necessary for the Commission to grant the relief requested in this Motion.

IV. CONCLUSION

For the reasons set forth in this Motion, PJM respectfully requests that the Commission grant this Motion no later than December 30, 2024.

Craig Glazer
Vice President – Federal Government
Policy
PJM Interconnection, L.L.C.
1200 G Street, NW, Suite 600
Washington, DC 20005
202-423-4743 (phone)
202-393-7741 (fax)
craig.glazer@pjm.com

Christopher B. Holt
Managing General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
610-666-2368
christopher.holt@pjm.com

Vasiliki Karandrikas
Assistant General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
(610) 666-4780
vasiliki.karandrikas@pjm.com

Respectfully submitted,

/s/ Elizabeth P. Trinkle
Wendy B. Warren
Elizabeth P. Trinkle
Wright & Talisman, P.C.
1200 G Street, NW, Suite 600
Washington, DC 20005
(202) 393-1200 (phone)
(202) 393-1240 (fax)
warren@wrightlaw.com
trinkle@wrightlaw.com

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

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 the captioned proceeding.

Dated at Washington, D.C., this 26th day of December 2024.

/s/ Elizabeth P. Trinkle

Elizabeth P. Trinkle