

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

PJM Interconnection, L.L.C.

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ER24-2045-000

ER24-2045-002

**MOTION FOR EXTENSION OF TIME
TO SUBMIT COMPLIANCE FILING OF PJM INTERCONNECTION, L.L.C.
AND REQUEST FOR ORDER BY AUGUST 11, 2025**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) moves for an extension of time to submit the compliance filing directed by the Commission’s July 24, 2025 order.² Specifically, PJM requests a modest thirty-day extension—until October 22, 2025—to submit its filing to comply with the directives of the July 24 Order.

As discussed below, good cause exists to grant this motion, as the requested extension will allow PJM to focus its attention on upcoming deadlines associated with Transition Cycle #1 and Transition Cycle #2 of its reformed interconnection process that are projected to occur on or around September 22, 2025, the same date that PJM’s compliance filing is currently due.³ PJM requests Commission action on this motion by **August 11, 2025**, which will permit PJM to devote its resources to completion of its Transition Cycle #1 and Transition Cycle #2 obligations before turning to the substantial time and effort necessary to comply with the directives of the July 24 Order.

¹ 18 C.F.R. § 385.212.

² *PJM Interconnection, L.L.C.*, 192 FERC ¶ 61,077 (2025) (“July 24 Order”).

³ See *Planning: Cycle Timeline*, PJM Interconnection, L.L.C., <https://www.pjm.com/planning> (last visited July 31, 2025) (noting that Decision Point III and the Final Agreement phase of Transition Cycle #1 are projected to begin on September 22, 2025; Phase I of Transition Cycle #2 is projected to close on September 24, 2025, and Decision Point I is projected to begin on September 25, 2025).

I. MOTION FOR EXTENSION OF TIME

The July 24 Order considered PJM’s proposal to comply with the requirements of Order No. 2023 and Order No. 2023-A,⁴ and ordered PJM to submit a further compliance filing revising significant portions of its original proposal. Most notably, the Commission ordered PJM to (1) “eliminate[] the reasonable efforts standard and propose study delay penalties”;⁵ (2) include revisions to its Open Access Transmission Tariff (“Tariff”) adopting the affected system study process and modeling requirements of the Final Rule;⁶ and (3) revise its cluster study process to either incorporate provisions from the Commission’s *pro forma* Large Generator Interconnection Procedures, or justify its proposals under the independent entity variation standard.⁷ Developing these provisions will require significant input from PJM’s interconnection personnel over the course of weeks, if not months, to ensure that PJM’s proposal is both compliant with the requirements of the July 24 Order and the Final Rule and feasible to implement within the PJM Region.

The compliance filing is currently due no later than September 22, 2025.⁸ Contemporaneously with that deadline, PJM projects that Decision Point III and the Final Agreement Negotiation Phase of Transition Cycle #1 of its reformed interconnection process will begin on September 22, 2025. In addition, Phase I of Transition Cycle #2 is

⁴ *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023, 184 FERC ¶ 61,054, *order on reh’g*, 185 FERC ¶ 61,063 (2023) (“Order No. 2023”), *order on reh’g*, Order No. 2023-A, 186 FERC ¶ 61,199 (2024) (“Final Rule”), *petition for review dismissed sub nom. Fla. Power & Light Co. v. FERC*, Nos. 23-1293, et al. (D.C. Cir. Apr. 10, 2024).

⁵ July 24 Order at P 222.

⁶ July 24 Order at P 264.

⁷ See July 24 Order at PP 48-49, 80, 92, 109, 121, 131-33, 163, 165.

⁸ July 24 Order at Ordering Paragraph (B) (directing compliance filing within sixty days).

projected to close on September 24, 2025, with Decision Point I of Transition Cycle #2 beginning on September 25, 2025. The personnel that are responsible for developing PJM's filing to comply with the directives of the July 24 Order are also responsible for completing the Tariff-imposed deadlines and obligations associated with the close of Transition Cycle #1 and Phase I of Transition Cycle # 2.⁹ Accordingly, PJM requests a modest thirty-day extension of time to submit its compliance filing to the July 24 Order to permit PJM staff to complete their obligations under the Tariff while allowing them to pivot their focus to meeting the Commission's compliance directives.

PJM's proposed extension will not result in undue prejudice to any party. It will also allow PJM's reformed interconnection process to continue without unnecessary delay, to the benefit of stakeholders and the PJM Region as a whole.

II. REQUEST FOR ACTION BY AUGUST 11, 2025

PJM respectfully requests that the Commission act on this request for extension of time by **August 11, 2025**. Action by that date is important so that PJM knows how best to allocate its resources to meet its obligations to both Project Developers and the Commission. If the Commission declines to grant the requested extension, PJM will be forced to stratify its resources to comply with the July 24 Order while also meeting its upcoming deadlines for Transition Cycle #1 and Transition Cycle #2, which could lead to queue processing inefficiencies that the Final Rule was intended to prevent.¹⁰

⁹ Tariff, Part VII Subpart D, section 308 (A)(1)(b)(1), section 309(A) (outlining timing and obligations for Phase I and Decision Point I); Tariff, Part VII, Subpart D, sections 313-314 (outlining timing and obligations for Decision Point III and Final Agreement Negotiation Phase).

¹⁰ See July 24 Order at P 3 (noting that the Final Rule adopted reforms to "increase the speed of interconnection queue processing"). PJM notes that, per the Commission's directive in Order No. 2023, the requirements of the Final Rule will become effective only after PJM completes its transition from Tariff, Part VII to Tariff, Part VIII. See Order No. 2023 at P 861 ("transmission providers that have already adopted a cluster study process or are currently undergoing a transition to a cluster study process will not be required to implement a new transition process.").

III. CONCLUSION

For the reasons stated above, PJM requests the Commission issue an order no later than **August 11, 2025**, granting the requested extension of time for PJM to submit its compliance filing.

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Respectfully submitted,

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August 4, 2025

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, DC, this 4th day of August 2025.

/s/ Elizabeth P. Trinkle

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