

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

**PJM Interconnection, L.L.C.**

)

**Docket No. ER26-403-000**

**MOTION FOR LEAVE TO ANSWER AND ANSWER  
OF PJM INTERCONNECTION, L.L.C.**

PJM Interconnection, L.L.C. (“PJM”) hereby submits this Motion for Leave to Answer and Answer<sup>1</sup> to the comments filed in the captioned proceeding by Monitoring Analytics, LLC, acting in its capacity as Independent Market Monitor for PJM (the “IMM Comments”).<sup>2</sup> The IMM Comments respond to PJM’s October 31, 2025 filing in the captioned proceeding of revisions to the PJM Open Access Transmission Tariff (“Tariff”) to establish Replacement Generation Interconnection Service as a separate serial interconnection process for the efficient and timely transfer of Capacity Interconnection Rights (“CIRs”) from deactivating generation resources to new replacement resources (each a “Replacement Generation Resource”).<sup>3</sup>

Contrary to the arguments made in the IMM Comments, the Replacement Generation Interconnection Service PJM proposes in the October 2025 Filing is part of the package of solutions to PJM’s resource adequacy issues that PJM filed in December 2024 and January 2025 and has a role to play in PJM’s ongoing efforts to expedite interconnection of generating facilities. Other arguments in the IMM Comments, such as

---

<sup>1</sup> PJM submits this answer pursuant to Rules 212 and 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”). 18 C.F.R. §§ 385.212, 385.213.

<sup>2</sup> *PJM Interconnection, L.L.C.*, Comments of the Independent Market Monitor for PJM, Docket No. ER26-403-000 (Nov. 21, 2025).

<sup>3</sup> *PJM Interconnection, L.L.C.*, Proposed Tariff Amendments for Replacement Generation Interconnection Service of PJM Interconnection, L.L.C., Docket No. ER26-403-000 (Oct. 31, 2025) (“October 2025 Filing”). Capitalized terms not otherwise defined in this pleading shall have the meanings given to them in the Tariff or in the Reliability Assurance Agreement Among Load Serving Entities in the PJM Region on file with the Commission.

the claim that the process will allow generators to exercise market power or that the interconnection process proposed in the October 2025 Filing is not a “proposal to truly reform CIRs,”<sup>4</sup> are, respectively, inaccurate, and irrelevant to the Commission’s consideration of the October 2025 Filing. PJM respectfully requests that the Commission: (i) grant this Motion for Leave to Answer; (ii) reject the arguments set forth in the IMM Comments; and (iii) accept PJM’s Tariff revisions proposed in the October 2025 Filing.

## **I. MOTION FOR LEAVE TO ANSWER**

PJM respectfully requests leave to file this answer to address arguments raised in the IMM Comments. Although the Commission’s Rules of Practice and Procedure generally do not permit an answer to protests,<sup>5</sup> the Commission routinely allows such answers when they provide useful or relevant information that will assist the Commission in its decision-making process.<sup>6</sup> This answer satisfies this standard by providing the Commission with responsive information to aid its review of the October 2025 Filing. Accordingly, PJM respectfully submits that good cause exists to grant this Motion for Leave to Answer.

## **II. ANSWER**

### ***A. The IMM Errs in Claiming that the October 2025 Filing Will Not Help, or Is Not Needed, to Address Reliability Concerns***

The IMM declares that the Replacement Generation Interconnection Service process “will not help address reliability concerns” and is superfluous in light of the

---

<sup>4</sup> IMM Comments at 3.

<sup>5</sup> 18 C.F.R. § 385.213(a)(2).

<sup>6</sup> See, e.g., *Midcontinent Indep. Sys. Operator, Inc.*, 193 FERC ¶ 61,127, at P 53 (2025) (accepting answer in response to protest to tariff revision filing); *Sw. Power Pool, Inc.*, 193 FERC ¶ 61,018, at P 39 (2025) (same).

Commission's acceptance of PJM's Reliability Resource Initiative ("RRI") and changes to PJM's Surplus Interconnection Service ("SIS").<sup>7</sup> Both claims are incorrect.

As explained in PJM's January 31, 2025 filing in Docket No. ER25-1128-000 and in the October 2025 Filing,<sup>8</sup> Replacement Generation Interconnection Service was developed as part of a larger package of reforms, including the RRI and SIS proposals the Commission has accepted,<sup>9</sup> to help address PJM's resource adequacy concerns. The three queue reform proposals discussed in the fall of 2024 all involved additions to PJM's general, clustered Cycle interconnection process, but each proposal was focused on a different time frame, a different universe of generating facilities, and/or a different mechanism for adding projects, and thus each has an independent role to play in addressing PJM's need to interconnect generation resources expeditiously.<sup>10</sup> The RRI process the IMM claims takes the place or accomplishes the purpose of Replacement Generation Interconnection Service<sup>11</sup> added selected new projects not already in the queue to Transition Cycle No. 2 and has already closed, while the SIS process and the Replacement Generation Interconnection Service process address facilities at existing generating facility sites and will continue running on an ongoing basis and in parallel to PJM's clustered Cycle

---

<sup>7</sup> IMM Comments at 4.

<sup>8</sup> *PJM Interconnection, L.L.C.*, Proposed Tariff Amendments for Replacement Generation Interconnection Service of PJM Interconnection, L.L.C., Docket No. ER25-1128-000, at 1-2, 4-5 (Jan. 31, 2025) ("January 2025 Filing"); October 2025 Filing at 3-6.

<sup>9</sup> See *PJM Interconnection, L.L.C.*, 190 FERC ¶ 61,084, order on reh'g and clarification, 192 FERC ¶ 61,085 (2025) (order accepting RRI); *PJM Interconnection, L.L.C.*, 190 FERC ¶ 61,083 (2025) (order accepting SIS).

<sup>10</sup> See Donnie Bielak, *Reliability Resource Initiative MRC Update*, PJM Interconnection, L.L.C., 9, 23 (Nov. 7, 2024), <https://www.pjm.com/-/media/DotCom/committees-groups/committees/mrc/2024/20241107-special/item-04---reliability-resource-initiative---presentation.pdf>.

<sup>11</sup> IMM Comments at 4, 6.

interconnection process.<sup>12</sup> The Replacement Generation Interconnection Service proposal provides an expedited path for interconnecting a group of projects that would be in the queue in any event, i.e., replacements for deactivating resources at the sites of the deactivating resources, and is thus distinct from the RRI process. IMM's contention that Replacement Generation Interconnection Service is not needed now that the RRI process and SIS changes are accepted ignores the differing time frames and types of projects the different processes cover, as SIS and Replacement Generation Interconnection Service will continue on through future Cycles and act in concert, not competition, with the main Cycle process.

Moreover, the IMM does not explain how the RRI process, which concluded earlier this year with the selection of 51 projects based on specific requirements,<sup>13</sup> can handle interconnection of Replacement Generation Resources on a going forward basis. He provides no explanation as to how the already-completed RRI can take the place of Replacement Generation Interconnection Service going forward and enable Replacement Generation Resources to claim CIRs from deactivating resources. The IMM also does not explain how SIS, which involves claiming surplus amounts of capacity at generating sites with projects already operating (or at least with an effective generator interconnection agreement), can take the place of Replacement Generation Interconnection Service, especially when SIS is not allowed after the existing resource is deactivated or has

---

<sup>12</sup> *PJM Interconnection*, 190 FERC ¶ 61,083, at P 31 (finding the SIS “proposal accomplishes the purposes of Order Nos. 845 and 2023 because the Tariff revisions will increase the utilization of existing interconnection facilities and network upgrades”); *PJM Interconnection*, 190 FERC ¶ 61,084, at P 14; October 2025 Filing at 4-5, 15.

<sup>13</sup> See Donnie Bielak, *Reliability Resource Initiative Additional Summaries*, PJM Interconnection, L.L.C., 6-8 (May 6, 2025), <https://www.pjm.com/-/media/DotCom/committees-groups/committees/pc/2025/20250506/20250506-rri-addendum---post-meeting.pdf>.

submitted a notice of deactivation.<sup>14</sup> The IMM's claims cannot overcome the fact that Replacement Generation Interconnection Service addresses interconnection of resources that are not covered by the RRI and SIS Tariff provisions and does so in a way that is complementary of those other processes.

***B. The October 2025 Filing is Just and Reasonable; the IMM Has Not Shown It Is Unjust and Unreasonable***

The test for a section 205 filing is whether it is just and reasonable, not whether it is the best process, or is more just and reasonable than the proposal filed by the utility.<sup>15</sup> The Commission has found that processes like the Replacement Generation Interconnection Service process are just and reasonable, and, in the order rejecting PJM's January 2025 Filing, directed PJM's attention to the MISO and SPP processes it already has approved.<sup>16</sup> Indeed, the Commission noted in the August 8 Order that:

As a general matter, [the Commission] find[s] that PJM's proposal would promote the efficient use of existing infrastructure<sup>17</sup> and may yield numerous other benefits, including: (1) efficiencies through using existing interconnection service at retiring facilities; (2) reduced interconnection timelines for replacement generation through an expedited study process; (3) cost savings for customers by reducing study and construction costs; and (4) reduced interconnection-related uncertainty in generation resource planning.<sup>18</sup>

---

<sup>14</sup> Tariff, Part VIII, Subpart E, section 414(B)(4)(a) ("Surplus Interconnection Service cannot be offered if the existing Generating Facility from which Surplus Interconnection is provided is deactivated or has submitted a Notice to Deactivate to Transmission Provider consistent with Tariff, Part V, before the surplus generating unit has commenced commercial operation.") (SIS provisions).

<sup>15</sup> *Cities of Bethany v. FERC*, 727 F.2d 1131, 1136 (D.C. Cir. 1984) (The Commission's inquiry is limited to "'just and reasonable'" and does not "extend to determining whether a proposed rate schedule is more or less reasonable than alternative rate designs."); *OXY USA Inc. v. FERC*, 64 F.3d 679, 692 (D.C. Cir. 1995) (stating that the approved methodology must be "'just and reasonable'" and "it need not be the only reasonable methodology, or even the most accurate").

<sup>16</sup> *PJM Interconnection, L.L.C.*, 192 FERC ¶ 61,137 at P 42 ("August 8 Order") (citing *Midcontinent Indep. Sys. Operator*, 167 FERC ¶ 61,146, at PP 8-13); *Sw. Power Pool, Inc.*, 171 FERC ¶ 61,270, at PP 4-5).

<sup>17</sup> January 2025 Filing at 9-10 (citing *Midcontinent Indep. Sys. Operator, Inc.*, 167 FERC ¶ 61,146, at P 71 (2019)).

<sup>18</sup> August 8 Order at P 42.

The Commission further found in the August 8 Order that “PJM’s proposals regarding the proposed eligibility criteria, application and study process, and cost allocation provisions largely overlap with processes that the Commission has approved for other regions.”<sup>19</sup>

The IMM Comments provide no basis for the Commission to find that the October 2025 Filing is not just and reasonable, as they do not touch at all on the benefits the Commission already has found in proposals like the Replacement Generation Interconnection Service or on the eligibility criteria, application and study process, and cost allocation provisions contained in the October 2025 Filing. The fact that the IMM thinks there are better ways to interconnect resources that will be using the CIRs of deactivating resources does not mean that PJM’s proposed Replacement Generation Interconnection Service is not just and reasonable.

*1. The IMM’s concerns regarding the Tariff’s provisions on CIR transfer are beyond the scope of the October 2025 Filing*

The IMM’s arguments rest on a presumption that generators’ rights to transfer CIRs are in question and could be changed as a result of the October 2025 Filing.<sup>20</sup> This is incorrect. PJM filed a proposal for the efficient interconnection of Replacement Generation Resources in January 2025, which the Commission rejected because it permitted open-ended extension of the commercial operation dates for Replacement Generation Resources.<sup>21</sup> As the IMM concedes, the August 8 Order did not address the

---

<sup>19</sup> August 8 Order at P 42 (citing *Midcontinent Indep. Sys. Operator*, 167 FERC ¶ 61,146, at PP 8-13); *Sw. Power Pool, Inc.*, 171 FERC ¶ 61,270, at PP 4-5.

<sup>20</sup> IMM Comments at 1-2, 4, 8.

<sup>21</sup> August 8 Order at PP 37-38 (finding “PJM’s lack of a maximum time limit for the one-time option for an extension of a Replacement Generator Resource’s Commercial Operation Date regardless of cause renders PJM’s proposal unjust and unreasonable because it undermines the purpose of the generator replacement process”).

IMM's concerns, raised in his comments on the January 2025 Filing, about the fact that generators are able to transfer CIRs.<sup>22</sup> PJM now has filed a similar proposal, with changes made to address the issues identified in the August 8 Order. Nothing in either the January 2025 Filing or October 2025 Filing would change the existing Tariff provisions governing the transfer of CIRs by deactivating resources,<sup>23</sup> making the IMM's concerns regarding CIR transfer wholly inapplicable here.

In the absence of the October 2025 Filing, owners of deactivating resources with CIRs today can avail themselves of the opportunity to use or transfer CIRs from deactivating resources under Tariff, Part VIII, Subpart E, sections 426(C)(3) and 426(C)(4) and they or the CIR transferee may request interconnection of the replacement project through PJM's clustered Cycle process, starting with Cycle No. 1, scheduled to commence in April 2026. The proposed Replacement Generation Interconnection Service process streamlines the interconnection element for projects meeting specific timing requirements, speeding the replacement of deactivating resources. The changes suggested by the August 8 Order, which PJM has incorporated in the October 2025 Filing, further focus on speeding up the replacement, thus helping to address PJM's resource adequacy needs.

The IMM Comments acknowledge that CIR transfer is already in the Tariff, but argues PJM is making the problems associated with CIR transfer worse by creating an "unwarranted" special access process.<sup>24</sup> The IMM does not explain how else the interconnection of Replacement Generation Resources could be expedited. PJM already

---

<sup>22</sup> IMM Comments at 4.

<sup>23</sup> See Tariff, Part VI, Subpart C, section 230.3.3; *id.*, Part VII, Subpart E, section 328(C)(3)-(4); *id.*, Part VIII, Subpart E, section 426(C)(3)-(4).

<sup>24</sup> IMM Comments at 9.

has explained that the IMM's suggestion that the RRI process can accomplish what Replacement Generation Interconnection Service was designed to do is incorrect.<sup>25</sup>

The IMM's concern, fundamentally, is the fact that the Tariff provides for CIRs to be transferred from deactivating resources to replacement resources. But taking the Tariff's existing CIR transfer provisions as a starting point, as PJM does, the Replacement Generation Interconnection Service proposal is a just and reasonable way to expedite the interconnection of Replacement Generation Resources in place of deactivating resources that already have been studied. The Commission has previously found several benefits in such processes, including the efficient use of existing infrastructure at retiring facilities and reduced study and construction costs,<sup>26</sup> and should find the same with respect to PJM's Replacement Generation Interconnection Service proposal.

2. *The IMM's claims concerning market power exercise are inaccurate*

The IMM also claims that the Replacement Generation Interconnection Service process will allow Replacement Generation Resource owners to exercise market power.<sup>27</sup> This claim ignores the simple fact that Project Developers that seek to obtain and transfer CIRs to a Replacement Generation Resource would be doing so for the purpose of offering the Replacement Generation Resource into the Reliability Pricing Model Auctions. In other words, if a resource owner intended to withhold a resource from the Reliability Pricing Model Auctions, such an owner would not seek CIRs for a Replacement Generation Resource in the first instance.

---

<sup>25</sup> IMM Comments at 10-12.

<sup>26</sup> See August 8 Order at P 42.

<sup>27</sup> IMM Comments at 5, 8-9.



To the extent the IMM's argument is that the Replacement Generation Interconnection Service queue itself is a form of market power because it is a "private bilateral" approach,<sup>28</sup> this claim goes back to the IMM's objection to the existing Tariff provisions for transfer of CIRs from deactivating resources and his contention that CIRs should terminate immediately upon deactivation of the generation resource to which the CIRs were granted.<sup>29</sup> That is not what the Tariff provides for, however. Given that the Tariff provides for CIRs from a deactivating resource to be transferred, the Replacement Generation Interconnection Service proposal represents a just and reasonable way to expedite the study and interconnection of the Replacement Generation Resources to which the CIRs are transferred.

3. *The Replacement Generation Interconnection Service Process will not slow down or confuse the PJM interconnection process or waste PJM staff resources*

The IMM Comments claim both that the Replacement Generation Interconnection Service Process would allow generators to "avoid the queue process" and that studying Replacement Generation Resources in parallel would slow down the interconnection process and waste PJM resources.<sup>30</sup> It cannot be both: either the Replacement Generation Interconnection Service process will not significantly interact with the clustered Cycle process or it will impact the clustered Cycle process so much that it will slow it down. The answer is the former—as the Commission acknowledged in response to the January 2025 Filing, it already has "found it unnecessary 'to send [existing generation owners] through a full interconnection process when the replacement generation facility will be using the

---

<sup>28</sup> IMM Comments at 9, 12.

<sup>29</sup> IMM Comments at 3.

<sup>30</sup> IMM Comments at 5-6, 8.

same type and level of service as the existing generating facility and will cause no material impact on the . . . transmission system.”<sup>31</sup> This finding accords with PJM’s judgment that applications for and studies of Replacement Generation Interconnection Service will not slow down the interconnection process or waste PJM resources, because the studies of replacement generation facilities at the same Points of Interconnection and levels of service are not as time intensive as studies of greenfield projects are.<sup>32</sup> There also is a finite number of possible Replacement Generation Interconnection Service requests because there is a finite (and relatively limited) number of deactivating resources.

---

<sup>31</sup> August 8 Order at P 42 (quoting *PacifiCorp*, 182 FERC ¶ 61,003, at P 10 (2023)).

<sup>32</sup> October 2025 Filing at 17-19.

### III. CONCLUSION

For the reasons set forth above, PJM respectfully requests that the Commission: (i) grant this Motion for Leave to Answer; (ii) reject the arguments set forth in the IMM Comments; and (iii) accept PJM's Tariff revisions proposed in the October 2025 Filing and grant the independent entity variations requested therein.

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

Christopher Holt  
Managing Counsel  
PJM Interconnection, L.L.C.  
2750 Monroe Blvd  
Audubon, PA 19403-2497  
(610) 666-2368  
Christopher.Holt@pjm.com

Respectfully submitted,

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

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

Dated: December 17, 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, D.C., this 17<sup>th</sup> day of December 2025.

/s/ Elizabeth P. Trinkle  
Elizabeth P. Trinkle

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