

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

|   |                         |
|---|-------------------------|
| Consolidated Edison Company of New York, )  | Docket Nos. EL15-18-005 |
| Inc. v. PJM Interconnection, L.L.C. )       |                         |
| )   |                         |
| Linden VFT, LLC v. PJM Interconnection, )   | EL15-67-005             |
| L.L.C. )                                    |                         |
| )   |                         |
| Linden VFT, LLC v. PJM Interconnection, )   | EL17-68-003             |
| L.L.C. )                                    |                         |
| )   |                         |
| PJM Interconnection, L.L.C. )               | ER17-950-006            |
| )   |                         |
| )   | (Not Consolidated)      |
| )   |                         |
| )   |                         |
| Neptune Regional Transmission System, LLC ) | EL21-39-000             |
| and Long Island Power Authority v. PJM )    |                         |
| Interconnection, L.L.C. )                   |                         |
| )   |                         |
| PPL Electric Utilities Corporation )        | ER22-1606-000           |
| )   |                         |
| PPL Electric Utilities Corporation )        | ER22-1606-001           |
| Neptune Regional Transmission System, LLC ) |                         |
| Long Island Lighting Co. )                  | (Consolidated)          |

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

PJM Interconnection, L.L.C. (“PJM”) respectfully submits this Motion for Leave to Answer and Answer<sup>1</sup> in response to the answers filed by (1) Consolidated Edison Company of New York, Inc., Linden VFT, LLC, Hudson Transmission Partners, LLC, and the New York Power Authority (collectively, the “New York Entities”),<sup>2</sup> and (2) the Long

---

<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> *Consolidated Edison Co. of New York, Inc. v. PJM Interconnection, L.L.C.*, Answer of Consolidated Edison Company of New York, Inc., Linden VFT, LLC, Hudson Transmission Partners, LLC, and New York Power Authority, Docket Nos. EL15-18-005, et al. (Apr. 8, 2026) (“New York Entities Answer”).

Island Power Authority (“LIPA”) and Neptune Regional Transmission System, LLC (“Neptune”) (collectively, “LIPA/Neptune”),<sup>3</sup> in response to PJM’s Motion for Extension of Time and Request for Expedited Action by May 1, 2026 filed on April 3, 2026, in this proceeding.<sup>4</sup>

The Commission should grant PJM’s Motion for Extension of Time **by May 1, 2026**, as requested, in order to ensure that PJM can satisfy the Commission’s directives in the Order on Remand<sup>5</sup> as accurately and completely as possible. Notably, *neither the New York Entities nor LIPA/Neptune challenge PJM’s request for additional time to comply*. PJM clearly demonstrated additional time is required to comply with the Order on Remand.

Rather, New York Entities and LIPA/Neptune both challenge PJM’s primary request for extension,<sup>6</sup> alleging that PJM is seeking an “indefinite” extension of time.<sup>7</sup> PJM fully intends to comply with the Commission’s directives. However, PJM and several other parties have also exercised their right to seek rehearing of certain aspects of the Order on Remand. PJM’s request for additional time to comply—until after Commission action on (1) PJM’s Request for Rehearing and Motion for Clarification included in the April 3 Filing

---

<sup>3</sup> *Consolidated Edison Co. of New York, Inc. v. PJM Interconnection, L.L.C.*, Answer of the Long Island Power Authority and Neptune Regional Transmission System, LLC to PJM Motion for Extension of Time and Request for Expedited Action, Docket Nos. EL15-18-005, et al. (Apr. 8, 2026) (“LIPA/Neptune Answer”).

<sup>4</sup> *Consolidated Edison Co. of New York, Inc. v. PJM Interconnection, L.L.C.*, Motion for Extension of Time and Request for Expedited Action by May 1, 2026, Motion for Clarification, and Limited Request for Rehearing of PJM Interconnection, L.L.C., Docket Nos. EL15-18-005 et al. (Apr. 3, 2026) (“April 3 Filing”). The April 3 Filing contained three discrete pleadings, including the “Motion for Extension of Time and Request for Expedited Action by May 1, 2026,” and for purposes of this answer, PJM refers to that pleading as “Motion for Extension of Time.”

<sup>5</sup> *Consolidated Edison Co. of New York, Inc. v. PJM Interconnection, L.L.C.*, 194 FERC ¶ 61,179, at P 92 (2026) (“Order on Remand”).

<sup>6</sup> See April 3 Filing at Section III.C.1 (requesting that the Commission allow PJM to defer its compliance with the Order on Remand until final Commission orders on (i) PJM’s request for rehearing and motion for clarification and any such filings by other parties, and (ii) any request for rehearing on the paper hearing established by the Order on Remand).

<sup>7</sup> New York Entities Answer at 2-4; LIPA/Neptune Answer at 2, 4-7.

as well as any other requests for rehearing that may be filed in this proceeding that would affect PJM's ability or need to complete resettlements, and (2) any request for rehearing that may arise from the paper hearing procedures established in the Order on Remand regarding allocation of costs for solutions addressing short circuit issues—is a measured and practical approach to compliance, not a request for an indefinite delay. These definite dates will allow PJM to have all the information it needs in order to process the resettlements as directed by the Commission. Additionally, PJM's request is intended to avoid the inefficiencies and potential need for duplicative resettlements should the Commission modify its directives on rehearing.

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

While Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213, does not generally provide for answers to answers, such pleadings have been permitted where, as here, the information provided in an answer will facilitate the Commission's decisional process, clarify the record, or aid in the explication of issues.<sup>8</sup>

Accordingly, PJM seeks leave to respond to the answers filed by New York Entities and LIPA/Neptune in order to assist the Commission in its decision-making and clarify the issues under consideration in the Motion for Extension of Time. This answer will provide the Commission with additional information that will aid its evaluation of this Motion for Extension of Time. Therefore, PJM respectfully requests that the Commission accept this answer.

---

<sup>8</sup> See, e.g., *DW-Lew Jones LLC*, 193 FERC ¶ 61,174, at P 32 (2025) (accepting PJM's answer to an answer because it provided information that assisted the Commission in its decision-making process); *PJM Interconnection, L.L.C.*, 193 FERC ¶ 61,192, at P 28 (2025) (accepting PJM's answer to protests because it provided information that assisted the Commission in its decision-making process); *PJM Interconnection, L.L.C.*, 176 FERC ¶ 61,163, at P 2 (2021) (accepting PJM's answer to protests because it provided information that assisted the Commission in its decision-making process).

## II. ANSWER

### A. **PJM’s Motion for Extension of Time Is Not for an Indefinite Period, But Rather for a Period of Time Necessary to Provide PJM with Sufficient Information to Respond to the Commission’s Directives.**

In their respective answers, both New York Entities and LIPA/Neptune allege that PJM is requesting what amounts to an “indefinite” extension to comply with the Commission’s directives in the Order on Remand.<sup>9</sup> LIPA/Neptune further characterizes PJM’s Motion for Extension of Time as “an indefinite halt and suspension” on the Commission’s directives.<sup>10</sup> Relatedly, LIPA/Neptune argue that PJM has not satisfied the “good cause” standard for granting motions for extension because administrative complexity does not satisfy this standard, and such requests must not be indeterminate.<sup>11</sup> PJM responds to these in turn.

First, PJM does not seek to extend the time to comply “indefinitely.” Rather, PJM primary request was for:

the Commission to defer its Compliance Directive until the Commission has acted on (1) PJM’s enclosed Request for Rehearing and Motion for Clarification as well as any other requests for rehearing that may be filed in this proceeding that would affect PJM’s ability or need to complete resettlements, and (2) any request for rehearing that may arise from the paper hearing procedures established in the Order on Remand regarding allocation of costs for solutions addressing short circuit issues.<sup>12</sup>

---

<sup>9</sup> New York Entities Answer at 2-4; LIPA/Neptune Answer at 2, 4-7. LIPA/Neptune also argues that PJM’s request is a *de facto* request for stay and that PJM has not met this standard. LIPA/Neptune Answer at 4-7. PJM, however, does not seek stay of any order or proceeding. Rather, as explained in the April 3 Filing and herein, PJM merely seeks additional time, following a structured three-step process, to effectuate the Commission’s directives of providing resettlements.

<sup>10</sup> LIPA/Neptune Answer at 4-5.

<sup>11</sup> LIPA/Neptune Answer at 7-10.

<sup>12</sup> April 3 Filing at 5-6.

None of these elements of PJM’s request is “indefinite” because it is a certainty that the Commission will and must act in any of these instances.<sup>13</sup> Critically, as explained in the Motion for Extension of Time, PJM does not seek this extension as a delay tactic—rather, PJM recognizes that the outcomes of any Commission action on the Motion for Clarification or any request for rehearing described above could fundamentally alter the nature of resettlements are owed, to whom, and in what amount.<sup>14</sup> Providing additional time would benefit PJM, the parties to this proceeding, and ratepayers in the PJM Region by promoting greater certainty in the resettlements, while also avoiding the risk of initiating work that may later need to be unwound and redone.

Despite arguments to the contrary, the Commission has on many occasions granted motions for extension of time to accommodate Commission action on rehearing, and PJM cited these in the April 3 Filing.<sup>15</sup> Further, in the April 3 Filing, PJM cited numerous examples of where refunds and surcharges in prolonged proceedings had been issued or

---

<sup>13</sup> To provide further clarity, PJM’s intent was to ask the Commission to defer the directives until final action *by the Commission* on requests for rehearing, and not on any Commission action that may arise from any appellate process. *See* New York Entities Answer at 2 n.6 (“PJM does not explain what it means by ‘final order,’ but it seems to be suggesting that the Commission wait until any rehearing requests and any appeals pertaining to the Remand Order or the paper hearing procedures ordered by the Commission are fully resolved, which could potentially take years.”).

<sup>14</sup> *See, e.g.*, April 3 Filing at 37 (“there is extensive uncertainty as to whether there will be any changes in cost responsibility assignments that result from the paper hearing procedures on short-circuit issues.”); at 40-41 (PJM seeking clarification to not recalculate cost responsibility assignments for over 600 projects because the current cost responsibility assignments are not and will never be used for allocating costs and the Tariff requires PJM to submit updated cost responsibility assignments before billing for these projects); at 42-43 (PJM seeking clarification that it has the authority to surcharge); at 44-45 (PJM seeking clarification as to whom PJM should surcharge and issue refunds—current load-serving entities or historical load-serving entities).

<sup>15</sup> *See* April 3 Filing at 18 n.53 (citing *Midwest Indep. Transmission Sys. Operator, Inc.*, Notice of Extension of Time, Docket Nos. ER05-6-118, et al. (Nov. 19, 2015) (granting extension of time until 180 days after the Commission’s issuance of a final order on issues set for hearing and settlement judge procedures, to file refund reports); *Entergy Serv., Inc.*, 142 FERC ¶ 61,010 (2013) (refunds postponed until the issues involving certain prior filings have been resolved and a final rehearing order is issued); *OREG I, Inc.*, Notice Extending the Date to Make Refunds, Docket Nos. EL11-22-000, et al. (June 15, 2011) (notice extending refund deadline until after the Commission acts on rehearing); *Panhandle E. Pipe Line Co.*, 107 FERC ¶ 61,319, at P 9 & ordering para. (B) (2004) (order granting request to delay refund payments until after the Commission acts on rehearing)).

were in the process of doing so, only to have further action by the Commission change course.<sup>16</sup> This is the situation PJM is trying to avoid here for the benefit of all parties involved.

Further, the New York Entities also challenge PJM’s alternative request that PJM be permitted to comply with the Order on Remand’s directives in a more methodical manner,<sup>17</sup> claiming that PJM’s schedule for implementing the Order on Remand’s compliance directives “is not reasonable.”<sup>18</sup> This assertion is wholly unsupported. PJM demonstrated, with substantial, unrebutted evidence, the need for the proposed resettlement schedule, as the “entire exercise – the recalculations, Tariff filing, and resettlements combined – is estimated to take 7952 to 13,780 hours.”<sup>19</sup> PJM recognizes that the New York Entities would like to receive any refunds due as quickly as possible. But, the fact is

---

<sup>16</sup> See April 3 Filing at 31-33 nn.87-89 (citing (1) the Black Oak proceedings: *Black Oak Energy, L.L.C. v. PJM Interconnection, L.L.C.*, 125 FERC ¶ 61,042 (2008), *order on clarification, Black Oak Energy, L.L.C. v. PJM Interconnection, L.L.C.*, 126 FERC ¶ 61,164 (2009); *Black Oak Energy L.L.C. v. PJM Interconnection, L.L.C.*, 136 FERC ¶ 61,040, at P 25 (2011), *reh’g denied, Black Oak Energy, L.L.C. v. PJM Interconnection, L.L.C.*, 139 FERC ¶ 61,111 (2012); *Black Oak Energy L.L.C. v. PJM Interconnection, L.L.C.*, 153 FERC ¶ 61,231, at P 1 (2015), *reh’g denied*, 155 FERC ¶ 61,013 (2016); *Black Oak Energy L.L.C. v. PJM Interconnection, L.L.C.*, 167 FERC ¶ 61,250, at P 14 (2019); (2) MISO’s Seams Elimination Cost Adjustment proceedings: *Midwest Indep. Transmission Sys. Operator, Inc.*, 152 FERC ¶ 61,213, at PP 2 & 7 (2015); *Midwest Indep. Transmission Sys. Operator, Inc.*, Notice of Extension of Time, Docket Nos. ER05-6-118, et al. (Nov. 19, 2015) (granting extension of time until 180 days after the Commission’s issuance of a final order on issues set for hearing and settlement judge procedures, to file refund reports); *Midwest Indep. Transmission Sys. Operator, Inc.*, Notice of Extension of Time, Docket Nos. ER05-6-118, et al. (May 31, 2017) (granting extension of time until September 17, 2017, to file refund reports); *Am. Elec. Power Serv. Corp. v. Midcontinent Indep. Sys. Operator, Inc.*, 164 FERC ¶ 61,186, at P 49 (2018); and (3) MISO’s revenue sufficiency guarantee proceedings: *Midwest Indep. Transmission Sys. Operator, Inc.*, 115 FERC ¶ 61,108, at P 2 (the Commission initially requiring refunds), *order on reh’g*, 117 FERC ¶ 61,113, at P 95 (2006) (the Commission reversing its decision, deciding not to require MISO to issue refunds on a retroactive basis upon rehearing), *reh’g denied*, 118 FERC ¶ 61,212, at P 87 (the Commission explaining its reasoning for not requiring refunds), *reh’g denied*, 121 FERC ¶ 61,131, at P 18 (2007) (the Commission stating that refunds applied prospectively in the second rehearing order).

<sup>17</sup> See April 3 Filing at Sections III.D and III.E (requesting that the Commission allow PJM to implement a three-step process to recalculate cost responsibility assignments and correct associated billings).

<sup>18</sup> New York Entities Answer at 4-5.

<sup>19</sup> April 3 Filing at 56 (citing April 3 Filing, Attachment A (Affidavit of Dr. Grace Niu on Behalf of PJM Interconnection, L.L.C.) ¶¶ 23-24; *id.*, Attachment B (Affidavit of Natasha Holter of PJM Interconnection, L.L.C.) ¶¶ 39-40)).

that the process is extremely complex and time consuming, and requires time to be done correctly.<sup>20</sup>

Second, contrary to the New York Entities' argument regarding administrative burden, the Commission has in fact on multiple occasions recognized that technical challenges and limited personnel satisfied the Commission's good cause standard for granting motions for extension of time.<sup>21</sup> PJM more than made its case for the complexities involved in the resettlements in this instant proceeding justifying its Motion for Extension of Time.<sup>22</sup>

The issues raised in the answers regarding the duration of PJM's Motion for Extension of Time and administrative burdens associated with executing the Commission's directives should be disregarded as contrary to Commission precedent and the demonstration of complexity presented in the Motion for Extension of Time.

---

<sup>20</sup> The challenges of and concerns regarding processing recalculations and resettlements are discussed in greater detail in the affidavits of Dr. Grace Niu and Ms. Natasha Holter included with the April 3 Filing as Attachments A and B. See April 3 Filing at 18-21.

<sup>21</sup> See April 3 Filing at 18 n.53 (citing, e.g., *See Ass'n of Bus. Advocating Tariff Equity v. Midcontinent Indep. Sys. Operator, Inc.*, Notice of Extension of Time, Docket No. EL14-12-016 (issued Apr. 2, 2026) (granting extension of time from May 1, 2026 to July 31, 2026); *PJM Interconnection, L.L.C.*, Notice Granting Request for Extension of Time (June 13, 2018) (granting extension of time to recalculate cost allocations for over 100 baseline projects that would require PJM to (1) perform and complete the analyses and calculations, (2) revise the tariff records, and (3) prepare the compliance filing); *Black Oak Energy, L.L.C., et al. v. PJM Interconnection, L.L.C.*, Notice of Extension of Time EL08-14-002, et al., (Oct. 26, 2009) (notice granting request to extend refund deadline due to limited personnel and technical resources); *Martha Coakley, et al. v. Bangor Hydro-Elec. Co., et al.*, Notice of Extension of Time, Docket Nos. EL11-66-000, et al. (Apr. 10, 2015) (notice granting request to extend refund deadline because additional time is needed to re-settle and calculate transmission charges for the refund); *SFPP, L.P.*, 144 FERC ¶ 61,002, at P 10 & ordering para. (D) (2013) (order granting request to extend refund deadline because the rate was subject to change); *City of Holland, Mich. v. Midwest Indep. Transmission Sys. Operator, Inc.*, Notice Granting Extension of Refund Date, Docket Nos. EL05-55-002, et al. (June 30, 2008) (granted extension of refund date where request for extension detailed technological challenges, limited expertise and personnel, and time needed).

<sup>22</sup> April 3 Filing at 3-13, 16-37.

### III. CONCLUSION

For the reasons set forth above, PJM requests that the Commission accept this answer and grant PJM's Motion for Extension of Time and Request for Expedited Action by **May 1, 2026**.

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

Jessica M. Lynch  
Associate General Counsel  
PJM Interconnection, L.L.C.  
2750 Monroe Blvd,  
Audubon, PA 19403  
(267) 563-3688  
jessica.lynch@pjm.com

April 14, 2026

Respectfully submitted,

/s/ Anne Marie Hirschberger  
Ryan Collins  
Anne Marie Hirschberger  
Wright & Talisman, P.C.  
1200 G Street, N.W., Suite 600  
Washington, DC 20005-3898  
(202) 393-1200  
collins@wrightlaw.com  
hirschberger@wrightlaw.com

Aspassia V. Staevska  
Senior Counsel  
PJM Interconnection, L.L.C.  
2750 Monroe Blvd.  
Audubon, PA 19403  
(484) 401-4931  
aspasia.staevska@pjm.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 this proceeding.

Dated at Washington, D.C., this 14th day of April 2026.

*/s/ Anne Marie Hirschberger*

\_\_\_\_\_  
Anne Marie Hirschberger  
Wright & Talisman, P.C.  
1200 G Street, N.W., Suite 600  
Washington, DC 20005-3898  
(202) 393-1200