

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

PJM Interconnection, L.L.C.)	
)	Docket Nos. ER26-1356-000
)	ER26-1356-001
)	

**MOTION FOR LEAVE TO ANSWER, ANSWER
AND RENEWED REQUEST FOR EXPEDITED ACTION OF
PJM INTERCONNECTION, L.L.C.**

Pursuant to Rules 212 and 213 of the Federal Energy Regulatory Commission (“Commission” or “FERC”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) hereby submits this Motion for Leave to Answer and Answer (“Answer”) to the Leeward Renewable Energy Development, LLC (“Leeward”) Motion for Leave to Answer and Answer.² For the reasons discussed below, PJM respectfully renews its request for expedited Commission action consistent with its previously stated position as soon as possible but no later than Monday, April 27, 2026, to avoid further delay to PJM’s Cycle timeline for Transition Cycle No. 2 (“TC2”).³

I. MOTION FOR LEAVE TO ANSWER

The Commission’s Rules of Practice and Procedure generally do not permit answers to answers, but this prohibition can be waived for good cause.⁴ The Commission has done so in circumstances where the answer would ensure a more complete record,⁵ lead to a better

¹ 18 C.F.R. §§ 385.212, 213.

² *PJM Interconnection, L.L.C.*, Motion for Leave to Answer and Answer of the Leeward Renewable Energy Development, LLC, Docket Nos. ER26-1356-000 & ER26-1356-001 (Apr. 10, 2026) (“April 10 Leeward Answer”).

³ To the extent necessary to grant PJM’s request for expedited Commission action, PJM respectfully seeks waiver of any applicable rules and regulations, including waiver of the FPA and the Commission’s 60-day notice requirement. *See* 18 C.F.R. § 35.3(a)(2).

⁴ *See* 18 C.F.R. §§ 385.212, 385.213.

⁵ *See, e.g., High Island Offshore Sys., L.L.C.*, 113 FERC ¶ 61,202, at P 8 (2005).

understanding of the issues in the proceeding,⁶ or assist the Commission in its decision-making process.⁷ Good cause exists to grant this Motion for Leave to Answer. PJM's Answer ensures a more complete record and understanding of the issues before the Commission which will assist the Commission in its decision-making process.

II. ANSWER

PJM submits this pleading to highlight that Leeward has not expressed opposition to PJM's request for expedited Commission action and provide supplemental information in support of PJM's request for prompt Commission action.

In its April 2, 2026, Motion for Leave to Answer, Answer, and Request for Expedited Action, PJM requested Commission action by April 14, 2026.⁸ On April 10, 2026, Leeward filed a Motion for Leave to Answer and Answer in which Leeward expressed non-opposition to PJM's request for expedited action.⁹ On April 13, 2026, AEP Indiana Michigan Transmission Company, Inc. ("AEP"), also filed a Motion for Leave to File Answer and Answer in which AEP did not take a position on PJM's request for expedited action.¹⁰

As PJM's April 2 Answer explained, the Commission's expedited action is necessary to enable PJM to maintain its Cycle schedule:

⁶ See, e.g., *CenterPoint Energy–Miss. River Transmission, LLC*, 141 FERC ¶ 61,080, at P 4 (2012); *TransColorado Gas Transmission Co.*, 111 FERC ¶ 61,208, at P 4, *order on reh'g*, 112 FERC ¶ 61,135 (2005).

⁷ See, e.g., *Hudson River-Black River Regulating Dist.*, 183 FERC ¶ 61,187, at P 9 n.21, *order on reh'g*, 185 FERC ¶ 61,034 (2023); *E. Shore Nat. Gas Co.*, 181 FERC ¶ 61,233, at P 9 n.17 (2022); *Tri-State Generation & Transmission Ass'n*, 179 FERC ¶ 61,118, at P 34, *order addressing arguments raised on reh'g*, 181 FERC ¶ 61,037 (2022); *S. Cal. Edison Co.*, 141 FERC ¶ 61,100, at P 5 (2012).

⁸ *PJM Interconnection, L.L.C.*, Motion for Leave to Answer, Answer and Request for Expedited Action, Docket No. ER26-1356-000 (Apr. 2, 2026) ("PJM April 2 Answer").

⁹ April 10 Leeward Answer at 1 n.4 ("Accordingly, while *Leeward does not oppose swift action from the Commission in this proceeding*, it urges the Commission to act on a timeline that allows it to carefully consider the issues presented by Leeward's Protest and this answer." (emphasis added)). Leeward's April 10 Answer does not reflect a change in its non-opposition to swift action from the Commission. See generally April 10 Leeward Answer.

¹⁰ *PJM Interconnection, L.L.C.*, Motion for Leave to file Answer and Answer of AEP Indiana Michigan Transmission Company, Inc., Docket No. ER26-1356-000 (Apr. 13, 2026).

Commission action by April 14, 2026, is not only appropriate but also is vital to PJM’s ability to complete the processing of TC1 projects and move to the next phase of Transition Cycle #2. In order to do so, PJM must perform a second retool to remove New Service Requests that did not execute their final service agreements and determine the necessary changes, if any, to the required Network Upgrades and any effects on cost allocation. Next, PJM must calculate Underfunded Network Upgrades to determine whether refunds are required. If refunds are required, PJM must distribute refunds per the Tariff. *Because there is a “gate” between the end of TC1 and the beginning of Transition Cycle #2, Phase III, which is scheduled to begin July 2, 2026, PJM must timely complete the TC1 requirements to follow its Transition Cycle #2 schedule.*¹¹

The “gate” between the Cycles refers to the Tariff language that provides, “Phase III of AG2-AH1 Transition Cycle #2 will only start after the Final Agreement Negotiation Phase of Transition Cycle #1 has concluded (*with all New Service Requests within Transition Cycle #1 either being withdrawn or resulting in a fully executed Tariff, Part IX service agreement*).”¹² This provision, coupled with another provision that states PJM may only perform a Phase III System Impact Study during Phase III, establishes a gating mechanism between Transition Cycle # 1 (“TC1”) and the start of TC2, Phase III.¹³ As of today, TC2, Phase III is scheduled to begin on July 2, 2026.

Before TC2, Phase III can begin, however, PJM must complete a significant amount of interconnection analysis activities. This includes completing and posting TC2, Phase II System Impact Study reports,¹⁴ which is currently scheduled to occur on June 1, 2026.¹⁵ The completion of TC2, Phase II System Impact Study reports is dependent upon PJM’s completion of the TC1

¹¹ PJM April 2 Answer at 16 (emphasis added).

¹² Tariff, Part VII, Subpart C, section 305(A)(2)(d)(i) (emphasis added).

¹³ “In no event shall Phase III of a Cycle commence before the conclusion of the Final Agreement Negotiation Phase of the immediately preceding Cycle. During Phase III, Transmission Provider shall conduct the Phase III System Impact Study.” Tariff, Part VII, Subpart A, section 300, Definitions P (Definition of Phase III).

¹⁴ See PJM Interconnection, L.L.C., *Planning / Cycle Timeline*, (Mar. 18, 2026) <https://www.pjm.com/planning> (“Transition Cycle 2, Phase III: Dependent on Transition Cycle 1 GIAs executed or withdrawn.”).

¹⁵ See PJM Interconnection, L.L.C., *Planning / Cycle Timeline*, (Mar. 18, 2026) <https://www.pjm.com/planning>.

Retool 2, because during this retool study PJM will confirm the Network Upgrades associated with TC1. Completing the TC1 Retool 2 is necessary to ensure that the TC2, Phase II System Impact Study reports contain accurate information about the Network Upgrades required for TC2 and estimates of associated Network Upgrades costs. Accurate costs estimates are important because they form the basis for Project Developers' business decisions on whether to proceed at TC2, Decision Point 2 and impact the calculation of the Phase II Readiness Deposits.¹⁶

As of this filing, all but this TC1 Generation Interconnection Agreement ("GIA") have been fully executed and filed with the Commission, or filed unexecuted and then accepted and made effective per a Commission order. Absent Commission action, this unexecuted AF2-068 GIA is not effective and, therefore, injects uncertainty regarding the funding source and cost allocation for the Network Upgrades that are set forth in this GIA. This precludes PJM from performing the Retool 2 for TC1 and, in turn, completing the interconnection analysis activities that are necessary to meet the June 2026 posting deadline for TC2, Phase II System Impact Study reports and the July 2, 2026, deadline for the start of TC2, Phase III. Therefore, PJM respectfully submits that the Commission's prompt disposition of this proceeding is necessary to avoid further delay to PJM's Cycle timeline for TC2.

¹⁶ Tariff Part VII, Subpart D, section 311 (A)(1)(b).

III. CONCLUSION

PJM requests that the Commission accept this Answer, and issue an order by April 27, 2026, accepting PJM's filing of the unexecuted Leeward GIA, and making it effective as of April 14, 2026, for the reasons set forth herein and in PJM's previous pleadings in the above-referenced dockets.

Respectfully submitted,

By: /s/ Salvia Yi

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April 24, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on those parties on the official Service List compiled by the Secretary in this proceeding.

Dated at Audubon, Pennsylvania this 24th day of April, 2026.

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