

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

Building for the Future Through Electric)
Regional Transmission Planning and)
Cost Allocation) Docket No. RM21-17-000

COMMENTS IN SUPPORT OF PJM INTERCONNECTION, L.L.C.

PJM Interconnection, L.L.C. (“PJM”) submits these comments in response to the Unopposed Motion for Extension of Time and Request for Expedited Consideration of PARSEC and PJM Transmission Owners¹ filed by the PJM Transmission Owners and the PJM Area Relevant State Entities Committee (“PARSEC”) in these proceedings seeking to extend (1) the Engagement Period provided for in Order No. 1920² to discuss cost allocation by 45 days, and (2) the compliance deadline for submitting a cost allocation compliance filing by 60 days, to August 11, 2026. PJM supports these requests as they will provide the PJM Transmission Owners and PARSEC additional time to continue their discussions regarding potential cost allocation approaches associated with PJM’s proposed Long-Term Regional Transmission Planning Protocol (“LTRTP Protocol”).³ PJM also respectfully requests that, to the extent the Federal Energy Regulatory Commission

¹ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Unopposed Motion for Extension of Time and Request for Expedited Consideration of PARSEC and PJM Transmission Owners, Docket No. RM21-17-000 (June 4, 2026) (“Joint Motion”).

² See *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Order No. 1920, 187 FERC ¶ 61,068, *order on reh’g & clarification*, Order No. 1920-A, 189 FERC ¶ 61,126 (2024), *order on reh’g & clarification*, Order No. 1920-B, 191 FERC ¶ 61,026 (2025), *appeals pending sub nom., Appalachian Voices v. FERC*, Nos. 24-1650, et al. (4th Cir. July 16, 2024). For purposes of these comments, PJM refers to Order No. 1920, as modified by Order Nos. 1920-A and 1920-B, as the “Final Rule.”

³ *PJM Interconnection, L.L.C.*, Order Nos. 1920, 1920-A, and 1920-B Compliance Filing of PJM Interconnection, L.L.C. and Request for Extension of Comment Period, Docket No. ER26-751-000 (Dec. 12, 2025) (“December Compliance Filing”).

(“Commission”) deems necessary, the Commission correspondingly extend PJM’s deadline for submitting those elements of the LTRTP Protocol that complement and implement cost allocation rules for selected Long-Term Transmission Projects, as described in PJM’s December Compliance Filing.⁴

I. COMMENTS IN SUPPORT

PJM supports the Joint Motion and its requested relief, including the request for the Commission to allow use of its Dispute Resolution Service.⁵ The PJM Transmission Owners and PARSEC state that this “extension, with the opportunity to make use of [the Commission’s Dispute Resolution Service], is appropriate in an attempt to reach consensus to develop and implement an *ex ante* Long-Term Regional Transmission Cost Allocation Method applicable to a region as diverse as PJM, encompassing 13 states and the District of Columbia.”⁶

As discussed above and in PJM’s December Compliance Filing, certain issues regarding the LTRTP Protocol are inextricably intertwined with the PJM Transmission Owners’ forthcoming cost allocation filing, which remains under development and may be subject to mediation. Accordingly, PJM will file—concurrently with PJM Transmission Owners’ August 11, 2026 cost allocation filing—PJM’s rules for effectuating and implementing those aspects of the LTRTP Protocol that cannot be fully developed until the

⁴ See December Compliance Filing at 36-37 (“There are two features of PJM’s compliance filing that are inextricably intertwined with the cost allocation rules: the state opt-out mechanism and voluntary funding opportunities. Given that additional time is needed for the development of the cost allocation rules, additional time is also needed for the development of the rules for the state opt-out mechanism and any voluntary funding opportunities. PJM will submit those rules and complete its compliance obligation with respect to long-term regional transmission planning, concurrent with the Transmission Owners’ compliance filing related to cost allocation, by no later than June 12, 2026.”); *see id.* at 124-25.

⁵ See Joint Motion at 2 & n.5.

⁶ Joint Motion at 3.

PJM Transmission Owners, in consultation with the PARSEC, finalize their cost allocation proposal. This will allow PJM sufficient time to work with the PJM Transmission Owners and PARSEC on developing these provisions. PJM's submittal of these LTRTP Protocol rules will complete PJM's compliance obligations under the Final Rule.⁷

II. CONCLUSION

PJM supports the Joint Motion for the reasons discussed above. Additionally, to the extent necessary, PJM respectfully requests that the Commission correspondingly extend to August 11, 2026 PJM's deadline for submitting the remaining LTRTP Protocol revisions that depend on the PJM Transmission Owners' cost allocation filing.

Respectfully submitted,

/s/ Anne Marie Hirschberger

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June 5, 2026

⁷ As discussed in its December Compliance Filing, PJM renews its request for any waivers or extensions that the Commission may deem necessary to effectuate PJM's request. See December Compliance Filing, Transmittal at 37 & n.112.

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 5th day of June 2026.

/s/ Anne Marie Hirschberger _____

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