UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Pennsylvania Public Utility Commission	)	
	)	
v.	)	**Docket No. EL26-98-000**
	)	
PJM Interconnection, L.L.C.	)	

UNOPPOSED MOTION FOR EXTENSION OF TIME OF
PJM INTERCONNECTION, L.L.C.

Pursuant to Rules 212, 213, and 2008 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission,[1] PJM Interconnection, L.L.C. (PJM) respectfully requests a 21-day extension of time to September 29, 2026 to answer the August 17, 2026 complaint of the Pennsylvania Public Utility Commission (PA PUC). Commission Rule 2008 authorizes extensions of time for "good cause" shown, which exists here.[2] PA PUC has authorized PJM to represent that PA PUC is unopposed to PJM's requested extension.

PJM requests a modest 21-day extension of time to prepare a thorough response to the Complaint. PA PUC alleges that "Schedule 6, Section 1.5.7 of PJM's Operating Agreement is unjust, unreasonable, and unduly discriminatory or preferential in the manner it selects market efficiency projects, thus harming Pennsylvania consumers."[3] PA PUC asks the Commission to "direct PJM to include the impact of all (benefitting and non-benefitting) zones when calculating consumer benefits for the purposes of market efficiency projects"[4] by either deleting certain language from the Operating Agreement or revising the Operating Agreement "to add the increase

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[1] 18 C.F.R. §§ 385.212, .213, & .2008 (2026).

[2] *Id.* § 385.2008.

[3] Complaint at 1.

[4] *Id.* at 1-2.

in Load Energy Payment and Load Capacity Payment to the denominator of the Benefit-Cost Ratio, in the definition of Total Enhancement Cost."[5] PA PUC therefore seeks material revisions to PJM's existing market efficiency project selection methodology.

The Commission should grant PJM's requested 21-day extension due to the press of other business occupying PJM's time and attention. PJM is currently working through its stakeholder process to provide solutions in response to the Commission's Show Cause Order regarding large loads in Docket No. EL26-67[6] and to comply with the Commission's directives in the June 18, 2026 co-located load order in Docket No. EL25-49.[7] Meanwhile, PJM is also preparing a preliminary set of proposed governance and stakeholder-process reforms to be filed with the Commission by August 26, 2026, as required by the Commission's August 10, 2026 Notice Regarding Dispute Resolution Procedures, and to participate in those dispute resolution procedures beginning on September 1, 2026.[8] Besides those matters, PJM is also preparing soon-to-be-filed revisions to its Tariff pursuant to Federal Power Act section 205 and participating in ongoing disputes before several federal courts. The timing is made more challenging by the fact that key personnel responsible for this matter within PJM have long been scheduled for leave that immediately precedes the noticed answer date.

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[5] *Id.* at 3.

[6] *See* Motion of PJM Interconnection, L.L.C. to Hold Proceedings in Abeyance and Request for Shortened Answer Period and Expedited Treatment, Docket No. EL26-67 at 8 (July 28, 2026) ("An abeyance is appropriate to allow PJM to identify and develop the necessary Tariff changes, engage with stakeholders on an expedited basis, and develop an FPA section 205 filing to address the Large Load Order while also finalizing its response to certain overlapping aspects of the Compliance Order."), *granted*, 196 FERC ¶ 61,129 (2026).

[7] *See PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,209 (2026).

[8] *See* Notice Regarding Dispute Resolution Procedures, Docket No. AD26-7 at 2 (Aug. 10, 2026).

Additionally, the requested extension will not prejudice the PA PUC or affect PJM's administration of the next market efficiency planning cycle. The proposal window for the 2026/2027 market efficiency cycle is not currently expected to open until the first Quarter of 2027 and is expected to remain open through the second Quarter of 2027. PJM currently expects to complete its analysis of the proposed solutions in November 2027, followed by a first read to stakeholders in December 2027, a second read in January 2028, and consideration by the PJM Board of Managers in February 2028. Accordingly, extending PJM's answer deadline by 21 days will not affect any imminent proposal, evaluation, stakeholder review, or project selection deadline. Indeed, even with the requested extension, PJM's answer will be filed several months before the next proposal window opens and more than a year before PJM expects to complete the analysis that is the subject of the Complaint.

The default twenty-day answer period is insufficient for PJM to fully respond to the Complaint given the complex issues it presents and the weight of PJM's ongoing matters. The requested extension will allow PJM to provide a thorough and meaningful answer, address material factual and legal assertions in the Complaint, and ensure that the Commission has a complete record on which to base its decision. Because the extension will not affect the market efficiency planning cycle or otherwise delay any imminent action, good cause exists to grant the requested extension. The Commission has granted motions to extend response deadlines in similar circumstances,[9] and it should grant the Motion here. The requested extension to September 29,

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[9] *See, e.g.*, Motion for Extension of Time of PJM Interconnection, L.L.C. and Request for Action by May 22, 2026, Docket No. EL26-63 at 4 (May 15, 2025) (requesting an extension where the Complaint would divert PJM's resources away from implementing Commission priorities concerning large loads), *granted*, Notice of Amended Complaint and Extension of Time, Docket No. EL26-63 (May 22, 2026); Notice of Extension of Time, Docket No. EL22-6 (Aug. 6, 2024) (granting an extension where the respondent had "numerous conflicts, pleading deadlines, and multiple depositions" in other proceedings).

2026 will allow PJM to develop a meaningful answer to the Complaint while managing its other pressing obligations, address material factual and legal assertions in the Complaint, and ensure that the Commission receives a full record upon which to base its decision.

PJM requests that the Commission grant this motion for extension of time on or before August 31, 2026, which will allow PJM to properly plan to file an answer by the original date if so required.

Respectfully submitted,

/s/ John Lee Shepherd, Jr.

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August 24, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have on this day caused to be served a copy of the foregoing motion for extension upon all parties on the service list in these proceedings in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2025).

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