UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Advantage Capital Renewables, LLC, **Complainant,** **v.** **PJM Interconnection, L.L.C.,** **Respondent.**	)	**Docket No. EL26-_________**

COMPLAINT AND REQUEST FOR FAST TRACK PROCESSING OF ADVANTAGE CAPITAL RENEWABLES, LLC

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TABLE OF CONTENTS

Page

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COMPLAINT AND REQUEST FOR FAST TRACK PROCESSING OF ADVANTAGE CAPITAL RENEWABLES, LLC

Pursuant to Sections 206, 306, and 309 of the Federal Power Act ("FPA"), 16 U.S.C. §§ 824e, 825e, 825h (2024), and Rules 206[1] and 212[2] of the Federal Energy Regulatory Commission's ("Commission" or "FERC") Rules of Practice and Procedure, Advantage Capital Renewables, LLC ("Advantage Renewables" or "Complainant") hereby submits this complaint ("Complaint") against PJM Interconnection, L.L.C. ("PJM") for its impermissible decision to withdraw Advantage Renewables' planned 100 MW energy storage project (Queue No. C01-1742, the "Freshwater Dune Project") from Cycle 01 of PJM's interconnection study process.[3] Further, as discussed below in Section IV, Advantage Renewables respectfully requests fast-track processing ("Request for Fast Track Processing") for the Complaint and a shortened comment period, with answers, interventions, and comments due no later than September 4, 2026, and further

[1] 18 C.F.R. § 385.206 (2026).
[2] 18 C.F.R. § 385.212 (2026).
[3] Capitalized terms not otherwise defined herein shall have the same meaning set forth in the PJM Open Access Transmission Tariff ("Tariff") or in PJM's manuals, as applicable.

respectfully requests that the Commission issue an order granting this Complaint by no later than September 21, 2026.

I. INTRODUCTION AND EXECUTIVE SUMMARY

This Complaint concerns PJM's impermissible withdrawal of a high-capacity energy storage project from Cycle 01 for alleged deficiencies that PJM never informed Advantage Renewables of during the period the Tariff allots for that purpose and that Advantage Renewables was never given the opportunity to cure. As discussed further below in Section II.C.i, the relevant provision of the Tariff, Section 403(B), sets forth a clear process for PJM to evaluate whether Applications are complete and can proceed to Phase I of PJM's study process:

1) following the initial submission of an Application by an Applicant, PJM may issue a notice of deficiencies to the Applicant describing the reasons why its Application does not adhere to PJM's Tariff requirements set forth in Section 403(A);[4]
2) the Applicant then has a chance to respond to the deficiencies; and
3) following review of the Applicant's responses, the Transmission Provider "will either validate or reject the Application."[5]

Despite this clear process, PJM never informed Advantage Renewables of all of the alleged deficiencies in its Application when required. Section 403(B)(1)(a) obligated PJM to inform Advantage Renewables of Application deficiencies within 15 Business Days after the Application Deadline, and Advantage Renewables responded to every deficiency PJM communicated to it, which were all deficiencies that Advantage Renewables understood there to be. When Advantage Renewables told PJM in writing, before the applicable deadline, that the NextGen portal[6] would

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[4] *See* Tariff, Part VIII, Subpart B, § 403(A) (Tariff, Part VIII, Subpart B, § 403, hereafter "Section 403").
[5] *See* Section 403(B)(1).
[6] As discussed further below, the NextGen portal is PJM's software tool that interconnection Applicants use to submit information to PJM.

not accept its submission and asked PJM to identify what remained outstanding, PJM named only two Transformer Information fields, Advantage Renewables completed those fields, and PJM confirmed receipt of the submission.

Three weeks later, however, PJM issued a *second round* of alleged deficiencies that PJM was not permitted to issue under the Tariff and impermissibly withdrew the Freshwater Dune Project from Cycle 01, notwithstanding that Advantage Renewables corrected all Initial Deficiencies (defined and described below in Section II.C.ii) that PJM identified. PJM's conduct violated its Tariff-defined procedures for reviewing Applications: PJM may not withdraw an Applicant's project for alleged failure to cure deficiencies that PJM did not identify, communicate, or evaluate in accordance with the Tariff, and may not issue a second round of deficiency findings after reviewing an Applicant's response to an initial set of deficiencies.

Further, none of the alleged deficiencies that PJM purported were the basis for withdrawing the Freshwater Dune Project in the Withdrawal Notice (defined and described below in Section II.C.v), nor any of the Second Round Deficiencies, concerned noncompliance with the criteria necessary for a valid Application under Section 403(A) of the Tariff. Instead, PJM treated information with respect to the Project as deficient because it allegedly did not conform to PJM's Dynamic Model Development Guidelines[7] for Interconnection Analysis (the "DMDG"), which are not set forth in the Tariff *or any PJM Manuals*. Accordingly, for the reasons set forth in further detail in Section III.B under the Commission's longstanding rule of reason and filed rate doctrine,[8] the Application's alleged failure to adhere to the DMDG cannot justify removing the Project from

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[7] PJM Interconnection, PJM Dynamic Model Development Guidelines for Interconnection Analysis, Rev. 2.1 (Mar. 10, 2026), *available at*: https://www.pjm.com/-/media/DotCom/planning/services-requests/pjm-dynamic-model-development-guidelines.pdf.

[8] *See, e.g.*, *KeySpan-Ravenswood, LLC v. FERC*, 474 F.3d 804 (D.C. Cir. 2007); *Energy Storage Ass'n v. PJM Interconnection, L.L.C.*, 162 FERC ¶ 61,296 (2018); *City of Cleveland v. FERC*, 773 F.2d 1368 (D.C. Cir. 1985).

Cycle 01 because PJM never filed those requirements—which significantly affect the rates, terms, and conditions of interconnection service and are outcome-determinative of queue eligibility—in its Tariff.

Moreover, for the additional reasons described herein, and in particular Section III.C, the Project's Application was subject to a fundamentally unjust, unreasonable, and unduly discriminatory review process: PJM fragmented its deficiency communications, affirmatively misdirected Advantage Renewables when it sought help, and withdrew the Freshwater Dune Project based on requirements that did not exist during the cure period.

Accordingly, Advantage Renewables respectfully requests that the Commission: (1) find that PJM's termination and withdrawal of the Freshwater Dune Project from the Cycle 01 interconnection queue violated Section 403 and was unjust, unreasonable, and unduly discriminatory in violation of FPA Section 206; (2) direct PJM to reinstate the Freshwater Dune Project (Queue No. C01-1742) in the Cycle 01 interconnection queue with its original queue position preserved; (3) grant fast-track processing and shorten the period for answers, interventions, and comments as requested in Section IV; and (4) order such further relief as the Commission deems necessary and appropriate.

II. APPLICABLE FACTUAL BACKGROUND

A. The Parties

Complainant Advantage Renewables is a limited liability company that is engaged in the business of financing and developing high-impact, utility-scale solar and energy storage projects.[9] Advantage Renewables is the developer of the Freshwater Dune Project and submitted an

[9] Advantage Renewables is a solar and energy storage development company sponsored by Advantage Capital, a leading impact investment firm that has invested more than $5 billion in small businesses, affordable housing, and energy solutions, including over $1.9 billion in renewable energy capital commitments adding more than 3.3 GWdc to energy infrastructure nationwide. *See* https://www.advantagecap.com/renewable-energy/.

interconnection Application for the project to PJM under Cycle 01 of PJM's interconnection study process.

Respondent PJM is the Regional Transmission Organization ("RTO") whose geographical footprint includes the Freshwater Dune Project and is the Transmission Provider. Under its Tariff, PJM has the responsibility for planning the expansion and enhancement of the PJM Transmission System on a regional basis and for administering the generation interconnection process, including the Cycle 01 Queue process through which the Freshwater Dune Project was being studied.[10]

B. The Freshwater Dune Project

The Freshwater Dune Project, assigned PJM Queue No. C01-1742, is an energy storage generating facility with an anticipated capacity of approximately 100 MW. The Freshwater Dune Project will interconnect with transmission facilities at a voltage level of 69 kV or above and is expected to have a generator MVA base of approximately 100 MVA. The interconnection Application for the Freshwater Dune Project was submitted under PJM Cycle 01, with a Cycle 01 Application Deadline of April 27, 2026. To date, Advantage Renewables has spent over four-hundred thousand dollars developing the Freshwater Dune Project.

C. Summary of Dispute

i. *Summary of Relevant Tariff Provisions*

Section 403 of the Tariff governs the submission and review of Applications in PJM's Cycle process and the deficiency-review process. Relevant to this Complaint, Section 403(A)(1) states that:

> For [PJM] to consider an Application for a Generation Interconnection Request complete, Applicant must include at a minimum each of the following, as further described in the Application and PJM Manuals:

[10] *See generally* Section 403.

a. Provide all Applicant information required in the Application, including parent company information and banking and wire transfer information.

b. Specify the location of the proposed Point of Interconnection to the Transmission System, including the substation name or the name of the line to be tapped (including the voltage), the estimated distance from the substation endpoints of a line tap, address, and GPS coordinates.

c. Provide information about the Generating Facility project, including whether it is (1) a proposed new Generating Facility, (2) an increase in capability of an existing Generating Facility, or (3) the replacement of an existing Generating Facility.

d. Indicate the type of Interconnection Service requested, whether (1) Energy Resource only or (2) Capacity Resource (includes Energy Resource) with Capacity Interconnection Rights.

e. Specify the project location and provide a detailed site plan.

f. Submit required evidence of Generating Facility Site Control (including the location of the main step-up transformer), including a certification by an officer or authorized representative of Applicant; and, at Transmission Provider's request, copies of landowner attestations or county recordings.

g. Provide information about Qualifying Facility status under the Public Utility Regulatory Policies Act, as applicable.

h. Submit required information and documentation if the Generating Facility will share Applicant's Interconnection Facilities with another Generating Facility.

i. For a new Generating Facility, specify requested Maximum Facility Output and Capacity Interconnection Rights.

j. For a requested increase in generation capability of an existing Generating Facility, specify the existing Maximum Facility Output and Capacity Interconnection Rights, and requested increases.

k. Provide a detailed description of the equipment configuration and electrical design specifications for the Generating Facility.

l. Specify the fuel type for the Generating Facility; or, in the case of a multi-fuel Generating Facility, the fuel types.

m. For a multi-fuel Generating Facility, provide a detailed description of the physical and electrical configuration.

n. If the Generating Facility will include a storage component, provide detailed information about (1) whether and how the storage device(s) will charge using energy from the Transmission System, (2) the primary frequency response operating range for the storage device(s), (3) the MWh stockpile, and (4) the hour class, as applicable.

o. Specify the proposed date that the project or uprate associated with the Application will be in service.

p. Provide other relevant information, including whether Applicant or an affiliate has submitted a previous Application for the Generating Facility; and, if an increase in generation capability, information about existing PJM Service Agreements and associated Queue Position Nos. or Project Identifier Nos.[11]

Further, Section 403(B) prescribes the deficiency-review process as a closed, three-step engagement between PJM and the Applicant to validate or reject the Application:

1. Following the close of the Application Deadline, the Transmission Provider "will exercise Reasonable Efforts to inform Applicant of Application deficiencies within 15 Business Days after the Application Deadline."[12]
2. The Applicant "then has 10 Business Days to respond to Transmission Provider's deficiency determination."[13]
3. The Transmission Provider "then will exercise Reasonable Efforts to review Applicant's response within 15 Business Days, and then will either validate or reject

[11] *See id.*, § 403(A)(1). Section 403(A) specifies other criteria that may be required to be included in an Application, but which are not relevant to the Freshwater Dune Project.
[12] *See* Section 403(B)(1)(a).
[13] *See* Section 403(B)(1)(b).

the Application."[14]

The Tariff does not authorize PJM to issue a second deficiency notice, a supplemental notice of deficiencies, a further response period, or additional requirements after the Applicant's response has been submitted.[15]

ii. ***Advantage Renewables' Application and PJM's Deficiency Notice***

Advantage Renewables timely submitted its Application for the Freshwater Dune Project under PJM Cycle 01 before the Cycle 01 Application Deadline of April 27, 2026. On June 2, 2026, PJM issued a formal deficiency notice requesting additional information for the Freshwater Dune Project (the "Deficiency Notice").[16] The Deficiency Notice identified five types of deficiencies:[17]

(1) Attachment Line Data (2 Total branch zero sequence impedance R0/X0 values);

(2) Project Capability (Dynamic Files and Single Line Diagram);

(3) Point of Interconnection (Total line length);

(4) Transformer Information (Missing R0/X0 values); and

(5) Site Control & Supporting Docs (Officer Certification and Evidence of Ownership).

The Deficiency Notice also provided comments in the "Additional Comments" section directing Advantage Renewables to NextGen with respect to short-circuit data and load-flow data to address during the cure period and stating that stability data is deficient:

(1) "Short Circuit data is deficient. Please see comments in NextGen and address

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[14] *See* Section 403(B)(1)(c).

[15] *See* Section 403(B)(1) (providing that the Transmission Provider "reviews Applications received from Project Developers for completeness and then establishes the validity of such submitted Applications" with "a deficiency review").

[16] *See* Attachment A (PJM email to Advantage Renewables with deficiency comments for project C01-1742 sent to F. Neha (Senior Project Manager for Advantage Renewables) dated June 2, 2026 (the "Deficiency Notice")).

[17] *See id.* at pp. 1–3.

deficiencies during cure period;"[18]

(2) "Load flow data is deficient. Please see comments in POI section."[19]

(3) "Stability data is deficient."[20]

The Deficiency Notice required Advantage Renewables to respond to the five types of deficiencies and the Additional Comments (collectively, the "Initial Deficiencies") within 10 Business Days, by close of business on June 17, 2026.[21]

iii. ***Advantage Renewables' Timely Cure***

a. Responses to Initial Deficiencies

On June 16, 2026, Advantage Renewables timely responded to PJM's Deficiency Notice prior to the June 17, 2026 deadline and addressed each of the Initial Deficiencies that PJM identified.[22] The following table sets forth each Initial Deficiency identified by PJM and Advantage Renewables' responsive submission:

Table 1

PJM Identified Deficiency	**Advantage Renewables' Cure**
Attachment Line Data: "2 Total branch zero sequence impedance R0/X0 values"	Corrected the attachment-line zero-sequence impedance values for both branches.
Project Capability: Dynamic Files and Single Line Diagram	Revised the single line diagram to reconcile the inverter count and submitted updated dynamic files, including an updated dynamic model reflecting the REGCA low-voltage parameter value PJM had identified.
Point of Interconnection: Total line length	Updated the total line miles.

[18] *See id.* at p. 2.
[19] *See id.* at p. 3.
[20] *See id.* at p. 2.
[21] *See id.* at p. 1.
[22] *See* Attachment B (Email correspondence between F. Neha and P. Gregory (Contractor for PJM) concerning Advantage Renewables' deficiency response submission and cure materials dated June 15-16, 2026).

Transformer Information: Missing R0/X0 values	Supplied the missing high-side, low-side, and tertiary R0 and X0 values for the Main Power Transformer and the GSU, and commented on the two Main Transformer fields that PJM identified as outstanding in response to Advantage Renewables' request for assistance.
Site Control & Supporting Docs: Officer Certification and Evidence of Ownership	Provided an updated Officer Certification containing the mineral rights paragraph and evidence of the payment required to extend site control through April 27, 2027. PJM confirmed on July 7, 2026 that "Site Control approved."
Additional Comment: "Short Circuit data is deficient. Please see comments in NextGen and address deficiencies during cure period."	Reviewed and responded to the short-circuit comments at the location in NextGen to which PJM directed Advantage Renewables. PJM has not disputed the sufficiency of that response.
Additional Comment: "Load flow data is deficient. Please see comments in POI section."	Addressed the load-flow comments in the POI section identified by PJM. PJM confirmed on June 16, 2026 that "[l]oad flow data is acceptable and approved."
Additional Comment: "Stability data is deficient."	Submitted an updated dynamic model, including the REGCA low-voltage parameter value PJM had identified, together with an updated DMDG package.

PJM confirmed that Advantage Renewables' responses were satisfactory with respect to non-stability deficiencies: on June 16, 2026, PJM confirmed that "[l]oad flow data is acceptable and approved,"[23] and in a comment dated July 7, 2026, PJM confirmed that "[s]ite [c]ontrol [is] approved."[24] PJM has never disputed these determinations. In response to PJM's comment that "Stability Data was deficient," Advantage Renewables submitted an updated dynamic model, including the REGCA low-voltage parameter value PJM had identified, together with an updated DMDG package.

[23] *See* Attachment C (Email from PJM's NextGen portal to F. Neha dated August 3, 2026 (the "Withdrawal Notice") at p. 1 (Additional Comments: "06/16/2026 (PJM LF - SJB): Load flow data is acceptable and approved.")).
[24] *See id.* (Additional Comments: "07/07/2026 (PG): Site Control approved.").

b. Advantage Renewables' Request That PJM Identify Any Remaining Deficiencies

Before the June 17, 2026 deadline, Advantage Renewables prepared its responses to the Initial Deficiencies and attempted to submit its cure materials through NextGen, PJM's portal for submitting information related to interconnection applications. The portal would not accept the submission. Instead, it returned an error stating that all deficiencies must be commented on or submitted before the submission could be completed. Advantage Renewables understood that error to mean what it said: that NextGen operated as a completeness check and would not permit a response to be submitted while any identified deficiency remained unaddressed. Because Advantage Renewables' project manager could not locate the outstanding uncommented fields the portal was referring to, she wrote to PJM that same day, stating: "I am trying to submit but I am getting [an] error from NextGen saying that all deficiencies must be commented on or submitted before submitting. Can you please help with finding what the issue is?"[25]

Figure 1

Hi Paul,

I am trying to submit but I am getting error from NextGen saying that all deficiencies must be commented on or submitted before submitting. Can you please help with finding what the issue is?

Thanks,

Farah Neha
SENIOR PROJECT MANAGER

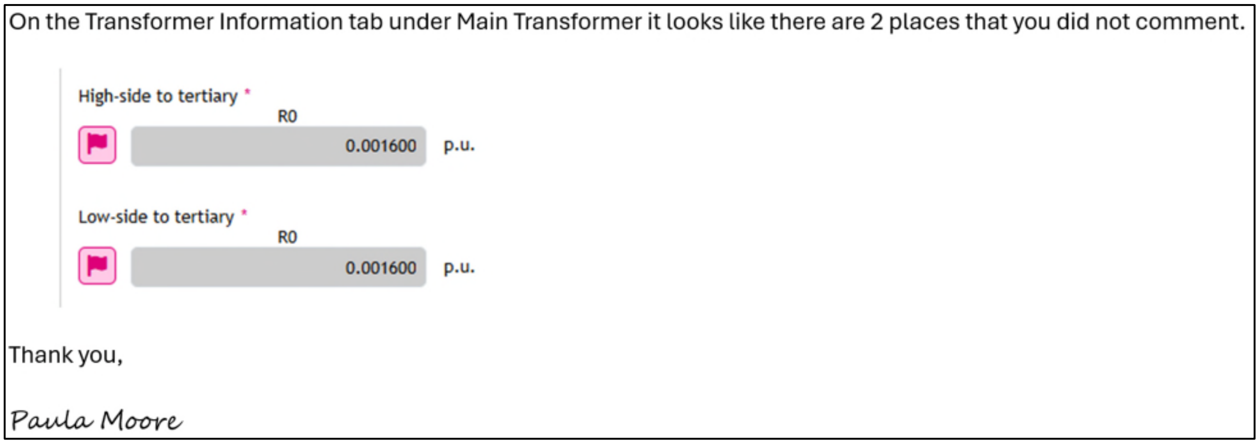
Email from F. Neha to PJM dated June 16, 2026, requesting assistance identifying outstanding deficiencies[26]

PJM reviewed the Application and responded by identifying two fields, and only two: "On

[25] *See* Attachment B at p. 3.
[26] *See id*.

the Transformer Information tab under Main Transformer it looks like there are 2 places that you did not comment."[27]

Figure 2


On the Transformer Information tab under Main Transformer it looks like there are 2 places that you did not comment.

High-side to tertiary *
R0
0.001600 p.u.

Low-side to tertiary *
R0
0.001600 p.u.

Thank you,

Paula Moore

Email from PJM to F. Neha dated June 16, 2026, identifying only two Transformer Information fields as outstanding.[28]

Importantly, PJM did not identify any stability comment. It did not refer Advantage Renewables to the Dynamic File(s) section, to the stability reviewer's comment, or to any other outstanding item. Advantage Renewables commented on the two Main Transformer fields PJM had identified, and the portal then permitted the submission to proceed. PJM confirmed receipt the same day, writing: "Thank you Farah, we have received your submission."[29]

This sequence demonstrates that PJM never identified the stability issues to Advantage Renewables during the cure period. PJM was asked directly, in writing, and before the deadline, to identify what remained outstanding on the Application. PJM reviewed the Application in order to answer that question and named two Transformer Information fields. Once those two fields were addressed, PJM, via NextGen, accepted the submission without qualification and without stating

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[27] *See id.* at p. 2.
[28] *See id.*
[29] *See id.* at p. 1.

that anything further was required. Had PJM regarded any stability comment as an outstanding deficiency at that time, the request for assistance gave it the opportunity to say so.

These facts reinforced Advantage Renewables' reasonable belief that its June 16, 2026, submission responded to every deficiency PJM had identified. Subsequently, Advantage Renewables came to understand that four stability data-related comments were embedded within the Dynamic File(s) section of NextGen, but because they were not properly communicated to Advantage Renewables, they were not substantively addressed during the cure period. Indeed, PJM never identified those stability-related comments to Advantage Renewables within the period prescribed in the Tariff, and NextGen did not flag them or require that they be completed before Advantage Renewables submitted its cure materials.

iv. ***PJM's Impermissible Identification of New Deficiencies After the Cure Period***

On July 7, 2026—three weeks after Advantage Renewables' submission of cure materials—PJM purported to identify *fourteen* deficiencies in Advantage Renewables' Application (the "Second Round Deficiencies"), including purported deficiencies that PJM materially reformulated only after Advantage Renewables submitted its cure materials. Notably, certain of the Second Round Deficiencies imposed requirements that PJM had never articulated to Advantage Renewables in any form. The remainder were outgrowths of the stability comments that PJM never communicated to Advantage Renewables during the cure period, and that consequently went unaddressed.

For example, one deficiency imposed a requirement that PJM had never previously identified for the Freshwater Dune Project during the deficiency review process: "Short Circuit Data is Deficient. For wind, solar or battery projects connecting to > = 69 kV, an equivalent collector system should be modeled and provided."[30] Although PJM had identified general short-circuit deficiencies during the original review, the specific equivalent-collector-system requirement was not identified in the Deficiency Notice or in correspondence with PJM, and Advantage Renewables was not given an opportunity to address it before it submitted its cure materials three weeks prior.[31]

The remaining thirteen deficiencies concerned the substance and completeness of the dynamic model Advantage Renewables had submitted in its cure materials, consistency between the power flow model and NextGen data, and stability issues that were either outgrowths of the stability comments PJM never communicated to Advantage Renewables during the cure period, requirements PJM had never previously identified in any form, or—worse—a value that PJM had itself directed Advantage Renewables to use, only to reverse course and declare that the very same value would produce an error:

(1) REECC settings (Vp1/Ip1 and VDL curves);

(2) Missing plant controller (REPC/PLNTB model);

(3) FRQTPAT and VTGTPAT models in the dynamic file (production of .dll files or removal required);

(4) missing PQ curve in the dynamic package;

(5) Incorrect PSSE version (Version 36 vs. required Version 35.3.2);

(6) Missing .sav, .raw, .cnv, .snp, and .sld files;

(7) Incomplete DMDG package (missing dynamic model report and checklist);

(8) Slack generator configuration (DMDG Section 10.4);

[30] *See* Attachment C at p. 2.
[31] *Compare* Attachments A and B *with* Attachment C.

(9) Station and auxiliary loads not modeled;

(10) Generator MVA mismatch (120 vs. 120.96 MVA);

(11) Source impedance mismatch (R Source 0.0 and X Source 1.0 vs. 9999);

(12) Main Power Transformer impedance mismatch between NextGen and the power flow model; and

(13) REGCA low-voltage parameter settings, where the substance of PJM's concern materially changed: the original comment recommended changing Lvpnt1 (a REGCA low-voltage parameter setting) to 0.01 and requested justification, while the July 7 comment stated that the submitted values would cause a PSSE initialization error.[32]

The Second Round Deficiencies concerning stability do not justify withdrawal because, *inter alia*, Advantage Renewables had good cause to believe that it had addressed all deficiencies based on PJM's responses. Several aspects of the record demonstrate that PJM's own conduct—not any failure by Advantage Renewables—caused the stability comments to go unaddressed during the cure period.

First, Section 403(B)(1)(a) required PJM to "inform" Advantage Renewables of all Application deficiencies within 15 Business Days after the Application Deadline. The relevant facts discussed previously in Section II.C.iii plainly demonstrate that PJM failed to do so with respect to the embedded stability-related comments: (1) NextGen initially blocked the submission when it detected an identified deficiency that lacked a response; when that occurred, Advantage Renewables asked PJM in writing, before the applicable deadline, to identify what remained outstanding; (2) PJM reviewed the Application and identified only two Transformer Information

[32] *Compare* Attachment A at p. 1 *with* Attachment C at p. 1.

fields;[33] and (3) after Advantage Renewables addressed those two fields, NextGen accepted the submission and PJM confirmed receipt, and neither identified any remaining deficiencies that needed to be addressed—including the stability-related deficiencies. This sequence shows that NextGen's completeness check did not treat the embedded stability comments as outstanding items, and that PJM did not communicate them as deficiencies requiring a response. Section 403(B)(1)(a) plainly required PJM to "inform" Advantage Renewables of all deficiencies in its Application pursuant to the processes and deadlines set forth in the Tariff. PJM failed to satisfy this requirement. Had PJM identified the embedded stability comments in its response to Advantage Renewables' timely query, Advantage Renewables would have addressed them in the same submission, as it did the two fields PJM identified.

Second, the Additional Comments demonstrate that PJM knew how to direct an applicant to the location of its comments and failed to direct Advantage Renewables to the stability issues. The short-circuit reviewer wrote: "Short Circuit data is deficient. Please see comments in NextGen and address deficiencies during cure period."[34] The load-flow reviewer wrote: "Load flow data is deficient. Please see comments in POI section."[35] By contrast, the stability reviewer's comment read, in its entirety: "Stability data is deficient."[36] It identified no section, no field, and no location, and it directed Advantage Renewables to review nothing.

Third, the outcome tracked the direction PJM gave. In every category in which PJM told Advantage Renewables where its comments resided, Advantage Renewables addressed those comments, and PJM either approved the response or has not disputed it.[37] The single category in

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[33] *See* Attachment B at p. 2.
[34] *See* Attachment A at p. 2.
[35] *See id*. at p. 3.
[36] *See id*. at p. 2.
[37] *See* Attachment C.

which PJM gave no such direction is the single category for which Advantage Renewables had no practicable way to provide a response.

Fourth, Advantage Renewables did respond to PJM's general statement that "stability data was deficient" by providing an updated dynamic model, including the REGCA low-voltage parameter value PJM had identified. That response did not address the additional stability-related comments that PJM *never* identified or communicated. When Advantage Renewables asked PJM, in writing and before the deadline, to help identify what remained outstanding, PJM reviewed the Application and named only two Transformer Information fields.[38] Had PJM identified the embedded stability comments in that same response, Advantage Renewables would have addressed them in the same submission, as it did the two fields PJM identified.

Fifth, PJM fragmented its deficiency comments across the NextGen portal and email—distributing initial-round comments among the deficiency email, a separate review section, and individual flagged fields within the portal rather than consolidating them in one location—and then treated items it never brought to Advantage Renewables' attention as grounds for withdrawal. That PJM consolidated all comments into a single section and a single email in the Second Round Deficiencies confirms that consolidation was feasible; PJM simply did not do it when it mattered.

Lastly, the NextGen portal permitted Advantage Renewables to submit its deficiency response as complete on June 16, 2026. PJM's own error message confirmed that the portal would not accept a submission until every deficiency had been commented on, and when Advantage Renewables asked PJM what remained outstanding, PJM identified only two Transformer Information fields. Once Advantage Renewables commented on those two fields, the portal

[38] *See* Attachment B.

released the submission and PJM acknowledged receipt.[39] Advantage Renewables therefore had every reason to believe that it had responded to all identified deficiencies.

v. *PJM's Withdrawal of the Freshwater Dune Project*

On August 3, 2026, PJM abruptly issued a notice withdrawing the Freshwater Dune Project (the "Withdrawal Notice"), summarily terminating Advantage Renewables' participation in Cycle 01. The Withdrawal Notice stated that the Freshwater Dune Project "has not demonstrated compliance with the requirements set forth in the Tariff to continue study" and that the "application has been withdrawn from further study."[40] PJM further stated that Advantage Renewables' Application was deficient because it "[f]ailed to meet Stability requirements," and that the DMDG package "was provided but it is still missing multiple files and has several deficiencies."[41]

vi. *Advantage Renewables' Request for Reinstatement*

Following the withdrawal of the Freshwater Dune Project, on August 6, 2026, Advantage Renewables sent Attachment D (the "Reinstatement Request Letter") to Jason Connell, Vice President, Planning, PJM, formally requesting that the Freshwater Dune Project be reinstated in PJM's interconnection queue.[42] PJM later responded and rejected Advantage Renewables' request.[43] On August 12, 2026, Advantage Renewables' counsel provided the Notice of Dispute under Section 12.1 of the Tariff and requested that PJM engage in Alternative Dispute Resolution ("ADR") under the Tariff.[44] On August 19, 2026, representatives from Advantage Renewables and PJM met pursuant to PJM's ADR process but were unable to resolve their dispute.

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[39] *See id*.
[40] *See* Attachment C at p. 1.
[41] *See id*.
[42] *See* Attachment D (Reinstatement Request Letter from Advantage Renewables to Jason Connell, Vice President, Planning, PJM, dated August 7, 2026).
[43] *See* Attachment E (Email from Donnie Bielak, Director, Interconnection Planning to counsel for Advantage Renewables dated August 7, 2026) at p. 1.
[44] *See* Attachment F (Notice of Dispute filed by Advantage Renewables under Section 12.1 of the Tariff, dated August 12, 2026) (the "Notice of Dispute").

III. ARGUMENT

A. PJM Failed to Inform Advantage Renewables of All Alleged Deficiencies Within the Time the Tariff Requires, and the Tariff Does Not Permit PJM to Reject an Application on Grounds First Disclosed After the Cure Period Has Ended.

PJM's threshold failure is one of notice. Section 403(B)(1)(a) obligated PJM to "inform Applicant of Application deficiencies within 15 Business Days after the Application Deadline," and PJM never informed Advantage Renewables of all of the deficiencies on which it ultimately relied to withdraw the Freshwater Dune Project. That failure is dispositive on its own, and it is compounded by the structure of the provision in which it appears. Section 403(B) prescribes a closed, three-step deficiency-review sequence with a binary outcome, the plain text of which prohibited PJM from rejecting Advantage Renewables' Application for the Freshwater Dune Project in the manner that it did. Section 403(B) specifies that the Transmission Provider "will exercise Reasonable Efforts to inform Applicant of Application deficiencies within 15 Business Days after the Application Deadline;" the Applicant "then has 10 Business Days to respond to Transmission Provider's deficiency determination;" after which the Transmission Provider "then will exercise Reasonable Efforts to review Applicant's response within 15 Business Days, and then will either validate or reject the Application."[45]

The plain text of Section 403 requires PJM to identify all "Application deficiencies within 15 Business Days after the Application Deadline."[46] PJM did not meet that basic requirement for the Second Round Deficiencies. Section 403(B)(1)(a) required PJM to identify those deficiencies within 15 Business Days after the Application Deadline, but PJM first recorded them in internal

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[45] *See* Section 403.
[46] *See* Section 403(B)(1)(a).

reviewer comments on July 7, 2026—well beyond that window.[47] Moreover, the deficiencies PJM cited in its Withdrawal Notice related predominantly to issues that PJM first raised three weeks after Advantage Renewables had submitted its cure materials—confirming that PJM failed to identify them within the time the Tariff requires. The Withdrawal Notice stated that the Freshwater Dune Project "[f]ailed to meet Stability requirements" and that the DMDG package "was provided but it is still missing multiple files and has several deficiencies."[48] Yet as demonstrated above, PJM had failed to communicate the Second Round Deficiencies cited in the Withdrawal Notice to Advantage Renewables during the cure period.[49] PJM's own date-stamps confirm this timeline: the stability reviewer's post-cure comment is dated July 7, 2026, while the Withdrawal Notice issued on August 3, 2026, nearly seven weeks after cure submission.[50] Moreover, as discussed, the stability-related comments that PJM later relied upon to withdraw the Freshwater Dune Project were never brought to Advantage Renewables' attention pursuant to the process and timeframes prescribed by the Tariff. PJM did not identify them when directly asked, and NextGen did not flag them as requiring a response. PJM therefore did not "inform" Advantage Renewables of any of the deficiencies on which it relied "within 15 Business Days after the Application Deadline"—or at any time during the cure period. Accordingly, PJM's withdrawal of the Freshwater Dune Project violated the plain text and notice requirement of Section 403(B)(1)(a).

Section 403(B)(1)(c) further supports that PJM's actions were contrary to the Tariff.[51] Advantage Renewables complied with the process the Tariff prescribes. PJM issued its deficiency

[47] *See* Attachment C at pp. 1–2 (Additional Comments showing date-stamps of July 7, 2026 for stability reviewer comments first identifying the stability-related deficiencies).
[48] *See id.* at p. 1.
[49] *Compare* Attachment A *with* Attachment C at pp. 1–2.
[50] *See* Attachment C at p. 1.
[51] *See* Section 403(B)(1)(c) ("Transmission Provider then will exercise Reasonable Efforts to review Applicant's response within 15 Business Days, and then will either validate or reject the Application.").

determination as the Deficiency Notice, and Advantage Renewables responded within the time period provided in Section 403(B)(1)(b), submitting its cure materials on June 16, 2026, which PJM acknowledged receipt of the same day.[52] At that point, Section 403(B)(1)(c) obliged PJM to review the response and either validate or reject the Application.[53] PJM did neither. Because PJM's sole authorized action at that juncture was to validate or reject the Application based on Advantage Renewables' response to the Initial Deficiencies, PJM's issuance of the Second Round Deficiencies on July 7, 2026 was beyond the scope of its authority under the Tariff. Accordingly, PJM was not authorized to withdraw the Freshwater Dune Project based on any purported failure to adhere to the Second Round Deficiencies, because such Second Round Deficiencies were not authorized under the Tariff.

By turning its review of the Freshwater Dune Project into an open-ended comment period on dynamic modeling, PJM exceeded the bounds of its review for completeness and validity. Section 403(B)(1) directs the Transmission Provider to review Applications "for completeness" and to establish "the validity of such submitted Applications."[54] The criteria governing completeness for a Generation Interconnection Request are enumerated in Section 403(A)(1). Section 403(A)(1) does not mandate the software version in which a dynamic model is submitted, the production of a Dynamic Model Report or Dynamic Model Checklist, or the configuration of a slack generator in accordance with a numbered section of an unfiled guideline.[55] Those requirements appear only in the DMDG, not in Section 403(A)(1), or even in a PJM Manual. In addition to the reasons described further below in Section III.B, by applying the DMDG as grounds

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[52] *See* Attachment B at p. 1.
[53] *See* Section 403(B)(1)(c).
[54] *See* Section 403(B)(1) ("Transmission Provider reviews Applications received from Project Developers for completeness and then establishes the validity of such submitted Applications.").
[55] *Compare* Attachment C, *with* Section 403(A)(1).

for rejection, PJM converted the completeness-and-validity review that Section 403(B)(1) prescribes into an open-ended, undefined review that the Tariff does not describe, and conducted on a schedule the Tariff does not contain.

Further, a tariff provision must be given a reasonable construction that avoids unfair, unusual, absurd, or improbable results.[56] Construing Section 403 to permit PJM to raise requirements after the Applicant's response that PJM never communicated during the cure period, while refusing any opportunity to address them, would render the 10-Business-Day response period set forth in Section 403(B) illusory. Under such a construction, no Applicant could ever know what it must satisfy, because the operative requirements would be capable of expansion after the Applicant's only opportunity to respond had closed. An Applicant would face a moving target defined by criteria disclosed only when invoked to reject its Application. That is precisely the unfair and absurd result the Commission's longstanding precedent related to interpreting tariff provisions forbids.[57]

B. Failure to Adhere to PJM's Dynamic Model Development Guidelines Is Not Grounds for Deeming an Application Deficient.

The filed rate doctrine prohibits a public utility from enforcing a rate, term, or condition of

[56] *See Monterey MA, LLC v. PJM Interconnection, L.L.C.*, 165 FERC ¶ 61,201, at P 45 (2018) ("[T]ariffs must have a reasonable construction and should be interpreted in such a way as to avoid unfair, unusual, absurd, or improbable results.") (quoting *Penn Cent. Co. v. Gen. Mills, Inc.*, 439 F.2d 1338, 1341 (8th Cir. 1971)).

[57] The REGCA low-voltage parameter issue (the "REGCA Low-Voltage Parameter Issue") in particular illustrates the absurdity of any construction of Section 403 permitting PJM's actions in this proceeding. PJM's original comment recommended changing Lvpnt1 to 0.01 and requested justification for the selection. *See* Attachment A at p. 1 ("[EPE - Gavgani] - Stability - REGCA: Lvpnt1 value is recommended to be 0.01 to eliminate unnecessary active-power curtailment. Please provide a brief description on the justification for this selection."). Advantage Renewables changed the value as PJM directed. PJM's post-response comment then raised a distinct concern: it characterized the submitted values as reversed and stated that they would cause a PSSE initialization error. *See* Attachment C at p. 2 ("REGCA: Lvpnt0/Lvpnt1 in REGCA (CON J+6 / J+7) of the model connected to bus 2 with ID=BT: provided Lvpnt1=0.01, Lvpnt0=0.03, typical value Lvpnt1 > Lvpnt0. PSSE will raise an error during initialization."). This was not a continuation of an identified deficiency. Rather, PJM generated a new finding through its review of the revised submission, penalizing Advantage Renewables for having done what PJM previously instructed.

service that it has not filed with the Commission.[58] The Commission's rule of reason policy identifies which practices must appear in a filed tariff rather than in a manual: a provision must be included in a tariff when it (i) "significantly affects rates, terms, and conditions" of service, (ii) is "readily susceptible of specification," or (iii) is not "generally understood in a contractual agreement"; only genuine implementation details may be left to a business practice manual.[59] As demonstrated below, all three prongs of the rule of reason are satisfied, requiring PJM to have filed the DMDG in its Tariff before relying on it as a basis to reject Advantage Renewables' Application.

The D.C. Circuit articulated the governing standard in *City of Cleveland*, construing FPA Section 205(c) to require the recitation of "only those practices that affect rates and service *significantly*, that are realistically *susceptible* of specification, and that are not so generally understood in any contractual arrangement as to render recitation superfluous."[60] The Commission has adopted that formulation as its governing standard for deciding what belongs in a tariff rather than a manual: the filing obligation reaches practices that matter to the service a customer receives, and excuses only those of "practical insignificance" to serving customers.[61] The DMDG is not of "practical insignificance." PJM's assertion that Advantage Renewables violated the DMDG has cost the Freshwater Dune Project its position in Cycle 01. In fact, the DMDG's requirements were the only stated reason for withdrawal provided by PJM in its Withdrawal Notice, and thus the most consequential body of requirements PJM applied to the Freshwater Dune Project.[62]

The D.C. Circuit's decision in *KeySpan-Ravenswood* confirms that these principles apply

[58] *See, e.g., KeySpan-Ravenswood,* 474 F.3d at 810–11; *see also Pub. Serv. Comm'n of N.Y. v. FERC,* 813 F.2d 448, 454 (D.C. Cir. 1987).
[59] *Energy Storage Ass'n*, 162 FERC ¶ 61,296, at P 103 (2018) (citations and internal quotes omitted).
[60] *City of Cleveland*, 773 F.2d at 1376.
[61] *See Energy Storage Ass'n,* 162 FERC ¶ 61,296, at P 103 (2018); *Cal. Indep. Sys. Operator Corp.*, 122 FERC ¶ 61,271, at P 16 (2008); *see also Pub. Serv. Comm'n of N.Y.*, 813 F.2d at 454 (holding that the Commission properly excused utilities from filing policies or practices that dealt with only matters of "practical insignificance" to serving customers).
[62] *See* Attachment C at p. 1.

with full force to the circumstances here. There, the New York Independent System Operator, Inc.'s ("NYISO") tariff provided only that a capacity translation would be performed "in accordance with the ISO Procedures," and NYISO supplied the operative methodology in an unfiled installed capacity manual developed through a stakeholder process.[63] The D.C. Circuit vacated and remanded the Commission's order, holding that the Commission acted arbitrarily and capriciously in ruling that NYISO had not violated the filed rate doctrine, because the methodology "significantly affected" NYISO's compliance with applicable reliability rules and was plainly "susceptible of specification," being "easily reduced to writing."[64] The court further rejected the contention that the manual had been incorporated by reference, holding that an "unelaborated reference to 'ISO Procedures'" could not be understood as the "clear[] and specific[]" notice that 18 C.F.R. § 35.1(a) requires.[65] The same features that led the court to find a filed rate violation in *KeySpan-Ravenswood* are present here. The operative requirements reside only in an unfiled document that is not even part of PJM's Manuals; they determined the disposition of the Freshwater Dune Project's Application; they are plainly susceptible of specification; and any passing allusion to the DMDG in an unfiled document outside of the Tariff would be the same species of unelaborated cross-reference that *KeySpan-Ravenswood* holds insufficient to bring an unfiled document within the filed rate.[66] Accordingly, the Commission should find that the DMDG is subject to the filed rate doctrine and that PJM's reliance on it as a basis for withdrawal violates that doctrine.

Moreover, where an RTO's tariff prescribes one process but an unfiled guideline imposes

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[63] *KeySpan-Ravenswood*, 474 F.3d at 806, 807.
[64] *See id*. at 810–11.
[65] *See id*. at 811 (rejecting argument that vague tariff cross-reference to "ISO Procedures" constituted "clear and specific" notice as required by 18 C.F.R. § 35.1(a)).
[66] *See id*.

additional or conflicting requirements, the filed tariff remains the governing source of the customer's obligations.[67] Here, Section 403(A)(1) enumerates what an Application must contain to be complete, and Section 403(B)(1) confines PJM's review to completeness and validity measured against those criteria. The DMDG impose a materially different and far more demanding set of obligations—a particular software version, designated deliverables, and prescribed model configurations—none of which appears in Section 403(A)(1). This contrast confirms why the DMDG's requirements must be specified in the Tariff before PJM can enforce them against an interconnection customer: because the DMDG imposes obligations beyond those the Tariff prescribes, PJM cannot lawfully predicate a project's withdrawal on noncompliance with standards that have not been filed with and approved by the Commission.

Applying the rule of reason prong by prong confirms that the DMDG must be specified in the Tariff before PJM may rely on it as a basis to reject an Application or withdraw a project from Cycle 01.

First, the DMDG "significantly affect rates, terms, and conditions" of interconnection service because compliance with them is outcome-determinative.[68] Failure to satisfy DMDG requirements was the express and stated basis for PJM's withdrawal of the Freshwater Dune Project from Cycle 01: the Withdrawal Notice cites the incomplete DMDG package and faults the slack generator configuration for not conforming to "Section 10.4 of the DMDG."[69] Withdrawal eliminates the Freshwater Dune Project's queue position and forecloses interconnection on the

[67] *Cal. Indep. Sys. Operator Corp.*, 154 FERC ¶ 61,122, at P 16 (2016) ("Commission precedent has long held that when a conflict exists between a filed tariff and an unfiled business practice manual, the tariff governs."); *Midwest Indep. Transmission Sys. Operator, Inc.*, 117 FERC ¶ 61,113, at P 47 (2006) ("[T]he filed and accepted tariff is the governing document and not the Business Practice Manuals - the former has precedence over the latter and not the other way around.")
[68] *See Energy Storage Ass'n*, 162 FERC ¶ 61,296, at P 103 (2018).
[69] *See* Attachment C at p. 1–2.

timeline contemplated. The comparison to *KeySpan-Ravenswood*, where the D.C. Circuit found that an unfiled methodology violated the filed rate doctrine because it "significantly affected" the system operator's compliance with applicable reliability standards, is instructive: there, that effect concerned compliance with reliability rules; here, the DMDG determine whether the Freshwater Dune Project remains eligible for study at all.[70]

Second, the requirements are "readily susceptible of specification."[71] The DMDG itself demonstrates this by setting out detailed, discrete, and objectively stated technical requirements—PSSE Version 35.3.2, enumerated file formats, a Dynamic Model Report and Dynamic Model Checklist, and specified generator and transformer configurations.[72] Requirements capable of being written down with that degree of precision in an unfiled guideline are, by definition, capable of being written down in a tariff provision. In *KeySpan-Ravenswood*, the D.C. Circuit found this element satisfied because the methodology at issue was "easily reduced to writing."[73] The DMDG already is reduced to writing; nothing but filing it as part of the Tariff remains. And filing is not a mere formality—it would subject the DMDG to Commission review under the just and reasonable standard of FPA Sections 205 and 206, ensuring that the requirements PJM imposes on interconnection customers have been vetted for reasonableness, including by being subjected to public comment, before they may serve as the basis for consequential action such as withdrawing a project from PJM's interconnection queue.

Third, DMDG requirements are not "generally understood in a contractual agreement" such that recitation in the Tariff would be superfluous. PSSE Version 35.3.2 is a PJM-specific selection among available software releases rather than an industry standard; a Dynamic Model Report and

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[70] *See KeySpan-Ravenswood*, 474 F.3d at 810–11.
[71] *See Energy Storage Ass'n*, 162 FERC ¶ 61,296, at P 103.
[72] *See* Attachment C at pp. 2–3.
[73] *See KeySpan-Ravenswood*, 474 F.3d at 811.

Dynamic Model Checklist are PJM-designated deliverables rather than conventional modeling artifacts; and Section 10.4 of the DMDG is, by definition, a provision of a document PJM has never filed. An applicant reading the Tariff from beginning to end would learn none of these requirements, and none can be derived from Good Utility Practice or from any other publicly available source. They are bespoke, PJM-specific specifications—the opposite of the shared industry understandings that the rule of reason excuses from filing.

Each of the three prongs of the rule of reason is satisfied here; the DMDG is not filed in the Tariff, and PJM's reliance on it as the predicate for withdrawing the Freshwater Dune Project therefore lacks a lawful basis.

Other longstanding Commission precedent confirms that material provisions affecting service must be filed in the Tariff rather than left solely in manuals or other non-tariff documents.[74] *Southwest Power Pool* is closely analogous to the situation here. There, the Commission found that because SPP's minimum run-time requirement "determines whether a resource is eligible to be used to satisfy a resource adequacy requirement," the requirement "significantly affects rates, terms, and conditions of service."[75] The Commission instituted an FPA Section 206 proceeding to direct SPP to include the requirement in its Tariff.[76] The DMDG's requirements operate the same way, and more consequentially: they determine whether an Application is eligible to remain in the

[74] *Energy Storage Ass'n*, 162 FERC ¶ 61,296, at PP 103–06 (partially granting complaint and finding that PJM's benefits factor calculation methodology and regulation signal parameters "significantly affect the rates, terms, and conditions of Regulation service" and are "reasonably susceptible to specification," and therefore must be included in the Tariff rather than left solely in manuals); *Sw. Power Pool, Inc.*, 169 FERC ¶ 61,048, at P 62 (2019) (instituting an FPA § 206 proceeding to direct SPP to include its 4-hour minimum run-time requirement for resource adequacy in SPP's Tariff because this requirement "significantly affects rates, terms, and conditions of service," and thus must be included in the Tariff under the rule of reason); *see also Cal. Indep. Sys. Operator Corp.*, 169 FERC ¶ 61,126, at PP 160–61 (2019) (finding that CAISO's metering methodology and accounting practices for electric storage resources "significantly affect rates, terms and conditions and should be included in the Tariff"); *Cal. Indep. Sys. Operator Corp.*, 185 FERC ¶ 61,210, at PP 183–84 (2023) (directing CAISO to include the governing methodology for its tunable market parameters in the Tariff).

[75] *See Sw. Power Pool*, 169 FERC ¶ 61,048, at P 62.

[76] *See id*.

interconnection queue at all. Moreover, in *Energy Storage Association*, the Commission likewise held that PJM could not confine outcome-determinative methodologies to its manuals.[77] Here, that same principle supports granting the Complaint and reinstating the Freshwater Dune Project: because PJM enforced unfiled requirements to withdraw the Project, the withdrawal lacks a lawful basis, and the Commission should order reinstatement as the appropriate corrective remedy.

PJM may respond that DMDG requirements are merely "implementation details" that need not be filed.[78] That characterization cannot be sustained. The Commission drew precisely this line in *Energy Storage Association*, finding that PJM's benefits factor methodology was "not a mere implementation detail" because it "significantly impacts" resource participation and, ultimately, market outcomes.[79] A requirement whose non-satisfaction results in queue withdrawal—eliminating an applicant's ability to interconnect in the applicable Cycle—is not ministerial. It is the paradigm of a provision that "significantly affects" the "terms and conditions" of interconnection service.

Accordingly, any alleged failure of Advantage Renewables to adhere to the DMDG cannot serve as a valid basis for withdrawing the Freshwater Dune Project from Cycle 01. Further, to the extent the DMDG are ever filed to be included in the Tariff, because their inclusion in the Tariff would be effective on a prospective basis only, the DMDG cannot serve as a valid basis for withdrawing the Freshwater Dune Project.

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[77] *Energy Storage Ass'n*, 162 FERC ¶ 61,296, at PP 103–06.
[78] *Cf. id.* at P 106 (2018) (finding that PJM's benefits factor methodology was "not a mere implementation detail" because it "significantly impacts" resource participation).
[79] *See id*.

C. PJM's Process for Evaluating Applications is Fundamentally Unjust, Unreasonable, and Unduly Discriminatory.

The two preceding Sections establish independent legal violations, each of which independently warrants relief: PJM rejected the Application on grounds first disclosed after the cure period closed, and PJM predicated that rejection on requirements it never filed. PJM's actions and inactions subjected Advantage Renewables to an unjust, unreasonable, and unduly discriminatory process that culminated in the impermissible withdrawal of the Freshwater Dune Project.

The Commission's applicable governing principles are well settled. Standardized interconnection procedures exist to "ensure[] that interconnection customers . . . receive non-discriminatory service and that all interconnection customers are treated on a consistent and fair basis."[80] Those procedures serve the FPA's requirements of "openness, equal treatment, and predictability," and the D.C. Circuit has held that departures from established practice must rest on "articulated objective, non-discriminatory, and evenhanded criteria."[81] An RTO that does not follow the procedure its own filed tariff prescribes does not administer that procedure justly or reasonably as to the applicant affected.

Measured against that benchmark, PJM's administration of the Application Review Phase failed in three mutually reinforcing respects. *First*, when Advantage Renewables asked PJM in writing, before the applicable deadline, to identify what remained outstanding, PJM reviewed the Application and named only two Transformer Information fields—omitting the very stability

[80] *MidAmerican Energy Co.*, 116 FERC ¶ 61,018, at P 7 (2006); *see also West Deptford Energy, LLC v. FERC*, 766 F.3d 10, 19 (D.C. Cir. 2014) (quoting same); Standardization of Generator Interconnection Agreements and Procedures, Order No. 2003, 68 Fed. Reg. 49,845, at P 11 (2003) (standardized procedures adopted to "minimize opportunities for undue discrimination").
[81] *See West Deptford*, 766 F.3d at 12–13, 20–21.

comments it would later invoke as grounds to withdraw the Freshwater Dune Project.[82] Relatedly, NextGen allowed the Application to be submitted as complete after initially stating it was incomplete, which gave Advantage Renewables further reasonable grounds to believe that providing additional information related to the two Transformer Information fields was sufficient to submit a completed Application, and that there were no stability-related deficiencies that needed to be addressed. *Second*, PJM fragmented its deficiency comments across the NextGen portal and in email—distributing initial-round comments among the deficiency email, a separate review section, and individual flagged fields within the portal rather than consolidating them in one location—and then treated items it never brought to Advantage Renewables' attention as grounds for withdrawal.[83] That PJM consolidated all comments into a single section and a single email in the Second Round Deficiencies confirms that consolidation was feasible; PJM simply did not do it when it mattered. *Third*, PJM then withdrew the Freshwater Dune Project based on requirements that were not communicated to Advantage Renewables during the applicable cure period.[84] The sequence is cumulative: an applicant who was affirmatively misdirected when it sought help identifying outstanding items, whose deficiency comments PJM never consolidated or communicated in one place, and who was ultimately judged against requirements it had never been given, had no practicable means of satisfying PJM's expectations.

PJM's conduct was also unduly discriminatory. Undue discrimination occurs where similarly situated entities are treated differently "for no discernable reason," and disparate treatment is permissible only where the RTO can justify the disparity by reference to "relevant,

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[82] *See* Attachment B at pp. 2-3.
[83] *See id.* (showing PJM's fragmented distribution of deficiency comments across the NextGen portal, email, and individual flagged fields).
[84] *Compare* Attachment A, *with* Attachment C (Withdrawal Notice) at pp. 1-2.

significant facts which are explained."[85] Advantage Renewables is similarly situated to every other Cycle 01 Project Developer: each submitted an Application before the same Application Deadline, each was subject to the same Section 403 deficiency-review process, and each was entitled to the same notice-and-cure sequence. Upon information and belief, PJM accepted other Cycle 01 applications containing the same categories of information it deemed deficient for the Freshwater Dune Project and did not consistently evaluate information submitted by Applicants.[86]

Removing a generation resource from the interconnection queue—in the midst of well-documented reliability challenges facing the PJM region—based on procedural deficiencies that were largely attributable to PJM's own disorganized process, defies logic and demonstrates that PJM failed its fundamental obligation to administer the interconnection process in a just, reasonable, and non-discriminatory manner.

D. The Requested Relief Is Just and Reasonable.

Advantage Renewables requests that the Commission direct PJM to reinstate the Freshwater Dune Project into Cycle 01 with its original queue position preserved. The relief requested is narrow and corrective rather than exceptional. Advantage Renewables does not seek an exemption from the Tariff, a waiver of any requirement, or preferential treatment relative to other Cycle 01 participants. It seeks the opposite: performance under the Tariff as written. As discussed, Advantage Renewables fully responded to the Initial Deficiencies, at which point PJM

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[85] *See Consol. Edison Co. of N.Y., Inc. v. FERC*, 45 F.4th 265, 271 (D.C. Cir. 2022); *BP Energy Co. v. FERC*, 828 F.3d 959, 967 (D.C. Cir. 2016) (quoting *Complex Consol. Edison Co. of N.Y., Inc. v. FERC*, 165 F.3d 992, 1012–13 (D.C. Cir. 1999)); *see also Black Oak Energy, LLC v. FERC*, 725 F.3d 230, 239 (D.C. Cir. 2013) ("We accept disparate treatment between ratepayers only if FERC 'offer[s] a valid reason for the disparity.'"); *Ark. Elec. Energy Consumers v. FERC*, 290 F.3d 362, 367 (D.C. Cir. 2002) ("A rate is not unduly preferential or unreasonably discriminatory if the utility can justify the disparate effect.") (citations and internal quotations omitted); *Xcel Energy Servs. Inc. v. FERC*, 41 F.4th 548, 558–60 (D.C. Cir. 2022).

[86] *See* Attachment G (Email from Evan Vaughan to MAREC PJM Committee dated August 14, 2026) at p. 2.

was required to validate the Application. Reinstating the Project simply adheres to the process that the Tariff prescribes and that PJM impermissibly departed from.[87]

To the extent the Commission also directs PJM to file the DMDG in its Tariff or otherwise correct its procedures prospectively, such prospective relief cannot remedy the past harm inflicted on Advantage Renewables and should not substitute for the reinstatement of the Freshwater Dune Project, which is the only adequate remedy for the Tariff violations that have already occurred. Further, as a practical matter, reinstating the Project into Cycle 01 will not materially disrupt Cycle 01 or prejudice other Project Developers. PJM is in the process of building the model for Phase I over the next several weeks and is not even expected to open Phase I until at least September 28, 2026.[88] Accordingly, if the Commission grants the Complaint in the timeframe requested herein, PJM will be able to reinsert the Project into Cycle 01 prior to PJM's currently scheduled commencement of Phase I.

IV. REQUEST FOR FAST TRACK PROCESSING AND SHORTENED COMMENT PERIOD

Advantage Renewables respectfully requests Fast Track processing of this Complaint pursuant to Rule 206(h) of the Commission's Rules of Practice and Procedure. The Commission "may resolve complaints using Fast Track procedures if the complaint requires expeditious resolution."[89] Expeditious resolution is warranted because PJM has already impermissibly

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[87] To the extent the Commission determines that Advantage Renewables must provide additional responses to alleged deficiencies that PJM failed to adequately communicate during the applicable timeframe under Section 403, Advantage Renewables requests, in the alternative, that the Commission direct PJM to afford Advantage Renewables the response period contemplated by Section 403(B)(1)(b) to address any such deficiencies.

[88] *See* PJM Completes Application Review on Cycle 01 Projects, RTO Insider (Aug. 5, 2026), *available at*: https://www.rtoinsider.com/138409-pjm-completes-application-review-cycle-1-projects/; Over 700 New Generation Projects Accepted Into First Cycle of Reformed Interconnection Process, PJM Inside Lines (Aug. 3, 2026), *available at*: https://insidelines.pjm.com/over-700-new-generation-projects-accepted-into-first-cycle-of-reformed-interconnection-process/.

[89] 18 C.F.R. § 385.206(h)(1).

removed the Freshwater Dune Project from Cycle 01, and reinstating the Project into Cycle 01 prior to the commencement of Phase I on September 28, 2026, is preferable in order to mitigate the risks of any potential disruptions to PJM's administration of Cycle 01.

Rule 206(f) of the Commission's rules provides that "[u]nless otherwise ordered by the Commission, answers, interventions, and comments to a complaint *must* be filed within 20 days after the complaint is filed."[90] Rule 206(h)(3) provides that "[b]ased on an assessment of the need for expedition, the period for filing answers, interventions and comments to a complaint requesting Fast Track processing may be shortened by the Commission from the time provided in section 385.206(f)."[91]

Expeditious resolution is necessary to prevent further, irreparable harm to Advantage Renewables. The period for filing answers, interventions, and comments should therefore be shortened to facilitate the expeditious resolution of the issues presented herein. PJM is fully aware of the facts and circumstances at issue since August 6, 2026. As such, a shortened answer period will not materially impede PJM's ability to respond to the Complaint.

Advantage Renewables respectfully requests a shortened comment period of ten (10) days, such that answers, interventions, and comments would be due no later than September 4, 2026. Moreover, Advantage Renewables respectfully requests that the Commission issue an order granting the Complaint and the requested relief by no later than September 21, 2026, in order to prevent additional harm to Advantage Renewables and to ensure that the Freshwater Dune Project can be reinstated into Cycle 01 before the commencement of Phase I, which PJM announced will begin on September 28, 2026.

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[90] *Id*. § 385.206(f) (emphasis added).
[91] *Id*. § 385.206(h)(3).

V. RULE 206 REQUIREMENTS

In accordance with Rule 206(b) of the Commission's Rules of Practice and Procedure, Advantage Renewables provides the following information. The action alleged to violate applicable statutory standards and regulatory requirements is described immediately below.

PJM has acted unjustly, unreasonably, and in an unduly discriminatory manner by terminating and withdrawing the Freshwater Dune Project (Queue No. C01-1742) from the Cycle 01 interconnection queue on August 3, 2026 on the basis of deficiencies that PJM first disclosed after the close of the cure period, and on the basis of requirements set forth only in PJM's unfiled DMDG, in violation of Section 403 of the Tariff, the Commission's rule of reason and the filed rate doctrine, and FPA Section 206.

1. Explanation of how the action or inaction violates such standards:

See Section III above.

2. Business, commercial, economic or other issues presented by the action or inaction:

Withdrawal from Cycle 01 eliminates the Freshwater Dune Project's queue position and, with it, the Project's path to interconnection on the schedule around which its development has been organized. Advantage Renewables must either reapply in a future cycle—restarting the application process, posting new deposits, and accepting a materially later commercial operation date—or abandon the Project altogether. Site control for the Project is maintained through annual Option Rent payments under an Energy Storage Option to Lease and Land Lease effective January 15, 2025, and carrying costs on a project with no queue position cannot be sustained indefinitely.

3. Financial impact or burden on Complainant:

Advantage Renewables has invested substantial capital in developing the Freshwater Dune Project, including site control payments, deposits paid to PJM, and engineering and consulting costs incurred to prepare the Application and to respond to PJM's Deficiency Notice. This includes: (i) $250,000 in Study Deposit amounts paid to PJM, of which $25,000 is non-refundable; (ii) a $400,000 Letter of Credit for PJM Readiness Deposits; (iii) $43,600 in acquisition costs for site control, consultants, and legal costs; and (iv) $4,000 in other legal costs for lease amendments. Because a withdrawn Application forfeits its queue position, these expenditures yield no corresponding benefit unless the Project is reinstated, and a future cycle would require Advantage Renewables to incur many of these costs again.

4. Practical, operational, or other non-financial impacts:

If the withdrawal is not corrected, an approximately 100 MW energy storage resource that would have been studied in Cycle 01 will not proceed on that schedule, and Advantage Renewables will be required either to abandon the Project or to restart PJM's interconnection process from the beginning in a later cycle. The consequences extend beyond this Project. If PJM may withdraw an application on grounds first disclosed after the cure period has closed, no applicant in any future cycle can know the requirements against which its application will be measured, and the removal of otherwise viable generation from the queue is contrary to the reliability needs of the PJM region.

5. Other pending proceedings and explanation why timely resolution cannot be achieved in that forum:

The issues presented in this Complaint are not pending before the Commission in any other proceeding or in any other forum. Advantage Renewables and PJM are participating in PJM's ADR process concerning the same withdrawal, as described in Item 8 below. That process is not a Commission proceeding and cannot afford timely relief for the reasons stated in Items 8 and 9.

6. Specific relief requested:

Advantage Renewables respectfully requests that the Commission: (1) find that PJM's termination and withdrawal of the Freshwater Dune Project from the Cycle 01 interconnection queue violated Section 403 of the Tariff and was therefore unjust, unreasonable, and unduly discriminatory; (2) direct PJM to reinstate the Freshwater Dune Project (Queue No. C01-1742) in the Cycle 01 interconnection queue with its original queue position preserved; (3) grant fast-track processing and shorten the period for answers, interventions, and comments as requested in Section IV; and (4) order such further relief as the Commission deems necessary and appropriate.[92]

7. Documents in support of complaint:

- Attachment A: Email from PJM to F. Neha containing PJM's deficiency comments for C01-1742 dated June 2, 2026 (the "Deficiency Notice");
- Attachment B: Email correspondence between F. Neha and P. Gregory of PJM concerning Advantage Renewables deficiency response submission and cure materials dated June 15-16, 2026 (the "June 15 & 16 Emails").
- Attachment C: Email from PJM to F. Neha dated August 3, 2026 withdrawing C01-1742 from Cycle 01 of PJM's interconnection study process (the "Withdrawal Notice").
- Attachment D: Letter from Advantage Renewables to Jason Connell, Vice President, Planning, PJM, dated August 6, 2026, requesting reinstatement of the Freshwater Dune Project (the "Reinstatement Request Letter");
- Attachment E: Email from Donnie Bielak, Director, Interconnection Planning to counsel for Advantage Renewables dated August 7, 2026 (the "August 7, 2026 Email");
- Attachment F: Notice of Dispute under Section 12.1 of the Tariff from Advantage Renewables to PJM, dated August 12, 2026 (the "Notice of Dispute");
- Attachment G: Email from Evan Vaughan to MAREC PJM Committee dated August 14, 2026; and
- Attachment H: Form of Notice.

8. Whether the Enforcement Hotline, Dispute Resolution Services, tariff-based dispute resolution mechanisms or other informal procedures were used, and if not, why?

Advantage Renewables has not used the Commission's Enforcement Hotline or Dispute Resolution Service. It has pursued PJM's Tariff-based dispute resolution procedures. Following the August 3, 2026 Withdrawal Notice, Advantage Renewables raised the withdrawal with PJM

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[92] As indicated, *supra* note 87, to the extent the Commission determines that Advantage Renewables must provide additional responses to alleged deficiencies that PJM failed to adequately communicate during the applicable timeframe under Section 403, Advantage Renewables requests, in the alternative, that the Commission direct PJM to afford Advantage Renewables the response period contemplated by Section 403(B)(1)(b) to address any such deficiencies.

and sought reinstatement of the Project. At PJM's request, Advantage Renewables submitted the dispute to PJM's ADR process, in which the parties have been engaged since August 12, 2026.[93] The Cycle 01 schedule will not await the conclusion of that process, and this Complaint is filed protectively to preserve reinstatement as a meaningful remedy.

9. Whether ADR could successfully resolve the complaint:

Advantage Renewables is participating in PJM's ADR process in good faith and will continue to do so in parallel with this proceeding. Advantage Renewables does not believe, however, that ADR can resolve this dispute within the time available, because reinstatement will cease to be a practicable remedy once Cycle 01 progresses substantially beyond the Application Review Phase. In addition, the questions presented—whether Section 403 permits withdrawal on grounds first disclosed after the cure period has closed, and whether requirements contained only in the unfiled DMDG may support a deficiency determination—are questions of tariff interpretation and filed rate doctrine that only the Commission can resolve.

10. Form of notice:

See Attachment H, attached hereto.

[93] *See* Attachment D (the "Reinstatement Request Letter"); *see also* Attachment F (the "Notice of Dispute").

VI. CONCLUSION

For the reasons described herein, Advantage Renewables respectfully requests that the Commission grant the relief requested in the Complaint and grant its Request for Fast Track Processing.

/s/ Steven Shparber
Steven Shparber
Omar Bustami
Lekë Badivuku
Katie Bekel
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
555 12th Street NW, Suite 1100
Washington, D.C. 20004
(202) 434-7417
SShparber@mintz.com
OBustami@mintz.com
LBadivuku@mintz.com
KBekel@mintz.com

Counsel to Advantage Capital Renewables, LLC

Dated: August 25, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document and its attachments to be served upon the Respondent's contacts listed on the Commission's list of Corporate Officials, upon affected regulatory agencies, and upon others that Advantage Capital Renewables, LLC reasonably knows may be expected to be affected by the Complaint in accordance with 18 C.F.R. § 385.206(c) (2026).

Dated at Washington, D.C., this 25th day of August, 2026.

/s/ Steven Shparber

ATTACHMENT A

From: NextGen <nextgen-donotreply@pjm.com>
Sent: Tuesday, June 2, 2026 11:02 PM
To: Farah Neha; tmcnailedn@advantagerenew.com; Steven Lichtin; Anaelle Croteau
Cc: ipadmin@pjm.com; paul.gregory@pjm.com
Subject: NextGen - PJM requests additional information for Freshwater Dune - C01-1742

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL

PJM requests additional information about the data provided for C01-1742 - Freshwater Dune.

Please log into NextGen to address all comments or provide additional information within 10 business days (by close of business on 06/17/2026).

Any request for which a Project Developer or Eligible Customer has not provided satisfactory responses within 10 business days shall be deemed to be terminated and withdrawn. When you access your application, the section(s) containing comments will be marked in the left navigation.

To proceed, please address all comments within the application, including the additional comments listed below, before resubmitting. Please contact your PJM Project Manager (Paul Gregory) with any project-specific questions.

The deficiency comments provided below are not intended to be exhaustive and reflect only the most recent comment for each field. Applicants are responsible for reviewing each deficient field in NextGen and addressing all associated comments to ensure a complete and satisfactory cure.

Attachment Line Data

Total branch zero sequence impedance X0: [Chen-EPE] Short Circuit -Zero sequence reactance X0 of the attachment line is equal to positive sequence reactance X1. Please verify and update.

Total branch zero sequence impedance R0: [Chen-EPE] Short Circuit -Zero sequence resistance R0 of the attachment line is equal to positive sequence resistance R1. Please verify and update.

Project Capability

Dynamic File(s): [EPE - Gavgani] - Stability - REGCA: Lvpnt1 value is recommended to be 0.01 to eliminate unnecessary active-power curtailment. Please provide a brief description on the justification for this selection. Check Lvpnt1 in REGCA module CONs(J+6)

Single line diagram: [Chen-EPE] Short Circuit -The SLD indicates 144 inverters, while NextGen shows 576 inverters. Please confirm the correct number and clarify how the 576 inverters are represented on the SLD.

Point of Interconnection

Total length of line: Total length of the line is 14.99 miles. Please update the total line miles and the distances from Substation A and B as needed.

Transformer Information

X0: [Chen-EPE] Short Circuit -The High-side to tertiary R0 and X0 values of MPT are missing in NextGen . Please verify and update.

R0: [Chen-EPE] Short Circuit -The R0 and X0 values of GSU are missing in NextGen . Please verify and update.

R0: [Chen-EPE] Short Circuit -The low-side to tertiary R0 and X0 values of GSU are missing in NextGen . Please verify and update.

X0: [Chen-EPE] Short Circuit -The low-side to tertiary R0 and X0 values of MPT are missing in NextGen . Please verify and update.

X0: [Chen-EPE] Short Circuit -The R0 and X0 values of GSU are missing in NextGen . Please verify and update.

R0: [Chen-EPE] Short Circuit -The High-side to tertiary R0 and X0 values of GSU are missing in NextGen . Please verify and update.

Site Control & Supporting Docs

Officer Certification Form: Project Developer to provide an updated Officer Certification containing the mineral rights paragraph in full. Refer to the additional comments section in the NextGen review tab for further details.

Evidence of Ownership: Developer needs to supply evidence of the payment required to extend the Site control term to the required date of April 27,2027. Refer to the 'additional comments' section for further details.

Additional Comments:

05/06/2026 (PJM SC- AMR): Short Circuit data is deficient. Please see comments in NextGen and address deficiencies during cure period.

05/08/2026 [EPE - Mostajeran] - Stability data is deficient.

05/21/2026 (PG): The site control document is an Energy Storage Option to Lease and Land Lease with an effective date of January 15, 2025. Per Section 2.1(a), the agreement provides an initial five-year Option Period, notionally ending January 14, 2030. However, Section 3.1 conditions the continuation of this Option Period on annual 'Option Rent' payments due on each anniversary of the effective date. To maintain site control through the required date of April 27, 2027, an Option Rent payment is required on or before January 15, 2027. Section 9.1 allows the Lessor to terminate the agreement for failure to make these payments. As the required payment is a future obligation and no evidence of its fulfillment has been provided, the site control term is not guaranteed through the required date of April 27, 2027. Project Developer needs to supply evidence of the payment required to extend the Site control term to the required date of April 27,2027.

05/21/2026 (PG): Section 5.5 of the Option states that: (i) Lessor holds rights to the oil, gas or mineral estate of the subject property; (ii) the Option does not confirm that Lessor will not interfere with Project Developer's rights under the Option; and (iii) the Officer Certification provided by Project Developer does not contain the appropriate mineral rights certification language. Project Developer to provide an updated Officer Certification containing the following language: "I certify that the absence of mineral rights does not preclude the ability of the Project Developer from constructing or operating the Generating Facility, including all MWs indicated in the Interconnection Request. Additionally, I certify that no third-party, including without limitation, any developer of the mineral estate, has the right to use or occupy any portion of the surface estate of the Site that Project Developer has submitted for Site Control, nor does any third-party have the right to place on the surface of such property any facilities, fixtures, equipment, building, structures, pipelines, rights of way or personal property of any kind or nature whatsoever that would interfere with the Project Developer's exclusive use and control of any of the Site properties for the Generating Facility."

05/30/2026 (PJM LF - SJB): Load flow data is deficient. Please see comments in POI section.

Legal Comments: None

Thank you,

PJM Planning

Note: This is an auto-generated email. Do not reply to this email.

ATTACHMENT B

From: Gregory, Paul C <Paul.Gregory@pjm.com>
Sent: Tuesday, June 16, 2026 2:55 PM
To: Farah Neha <fneha@advantagerenew.com>; System Planning Admin <SystemPlanning.Admin@pjm.com>
Subject: RE: C01-1742 Application Submission

EXTERNAL

Thank you Farah, we have received your submission.

From: Farah Neha <fneha@advantagerenew.com>
Sent: Tuesday, June 16, 2026 1:53 PM
To: System Planning Admin <SystemPlanning.Admin@pjm.com>; Gregory, Paul C <Paul.Gregory@pjm.com>
Subject: RE: C01-1742 Application Submission

External Email! Think before clicking links or attachments.

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

Thank you for noting that Paula.

Can either of you confirm that the submission has been received?

Thanks,

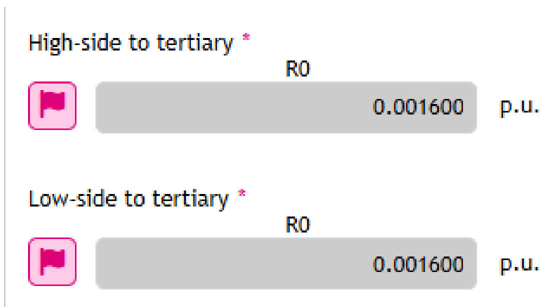
Farah Neha
SENIOR PROJECT MANAGER

O: 347-609-2352
C: 347-609-2352
fneha@advantagerenew.com · advantagerenew.com

From: System Planning Admin <SystemPlanning.Admin@pjm.com>
Sent: Tuesday, June 16, 2026 1:42 PM
To: Farah Neha <fneha@advantagerenew.com>; Gregory, Paul C <Paul.Gregory@pjm.com>
Cc: System Planning Admin <SystemPlanning.Admin@pjm.com>
Subject: RE: C01-1742 Application Submission

EXTERNAL

On the Transformer Information tab under Main Transformer it looks like there are 2 places that you did not comment.



Thank you,

Paula Moore
Sr. Analyst II, Interconnection Projects
(610) 666-2312 | C: (610) 574-5950 | Paula.Moore@pjm.com
PJM Interconnection | 2750 Monroe Blvd. | Audubon, PA 19403

From: Farah Neha <fneha@advantagerenew.com>
Sent: Tuesday, June 16, 2026 12:13 PM
To: Gregory, Paul C <Paul.Gregory@pjm.com>
Cc: System Planning Admin <SystemPlanning.Admin@pjm.com>
Subject: RE: C01-1742 Application Submission

External Email! Think before clicking links or attachments.

Hi Paul,

I am trying to submit but I am getting error from NextGen saying that all deficiencies must be commented on or submitted before submitting. Can you please help with finding what the issue is?

Thanks,

Farah Neha
SENIOR PROJECT MANAGER

O: 347-609-2352
C: 347-609-2352
fneha@advantagerenew.com · advantagerenew.com

From: Gregory, Paul C <Paul.Gregory@pjm.com>
Sent: Monday, June 15, 2026 7:02 PM
To: Farah Neha <fneha@advantagerenew.com>
Subject: C01-1742 Application Submission

He Farah,

This is just a friendly reminder that submittal of the application deficiency cures for C01-1742 is due tomorrow, 6/16/2026. Please be sure to 'submit' at the bottom of the NextGen review tab.

Thank you and please let me know if you have any questions.

Paul Gregory
Contractor, Interconnection Planning Projects
(267) 882-0329 (Mobile) Paul.Gregory@pjm.com
PJM Interconnection | 2750 Monroe Blvd. | Audubon, PA 19403

ATTACHMENT C

From: NextGen <nextgen-donotreply@pjm.com>
Sent: Monday, August 3, 2026 9:24 AM
To: fneha@advantagecap.com; acroteau@advantagerenew.com; slichtin@advantagecap.com; tmcnailen@advantagerenew.com
Cc: systemplanning.admin@pjm.com; paul.gregory@pjm.com
Subject: NextGen - C01-1742 has been withdrawn

Importance: High

EXTERNAL

Dear Applicant,

Thank you for your interest in participating in PJM's Interconnection process.

After careful review of your Application, PJM regrets to inform you that your application, C01-1742, has not demonstrated compliance with the requirements set forth in the PJM Tariff to continue study. As a result, your application has been withdrawn from further study.

Your submission has been withdrawn C01-1742 for the following reason(s):
Deficient
Failed to meet Stability requirements
The PD did not provide stability files including the DMDG package at round 1. In round 2 the DMDG package was provided but it is still missing multiple files and has several deficiencies.

Additional Comments:

06/16/2026 (PJM LF - SJB): Load flow data is acceptable and approved.

07/07/2026 (PJM SC - Portnoy): Short Circuit Data is Deficient. For wind, solar or battery projects connecting to >= 69 kV, an equivalent collector system should be modeled and provided.

07/07/2026 (PG): SIte Control approved.

07/07/2026 [PJM - Ghayas] - Stability data is deficient in round 2.

1. REGCA: Lvpnt0/Lvpnt1 in REGCA (CON J+6 / J+7) of the model connected to bus 2 with ID=BT: provided Lvpnt1=0.01, Lvpnt0=0.03, typical value Lvpnt1 > Lvpnt0. PSSE will raise an error during initialization.
2. REECC: Vp1 is not zero and corresponding Ip1 is less than 1. This may contribute to unnecessary active power curtailment. VDL curves should be disabled if possible. Please provide a brief description on the justification for this selection. Check VDL curves in REECC module (CONs(J+25) to CONs(J+40))

3. Missing Models: Missing 1 plant level controller models. Found zero 'REPC' models but need 1 to match 'REGC' models. No PLNTB model found as alternative.
4. There is model called "multiple FRQTPAT" and "multiple VTGTPAT" in the dyr file which are PSSE generic models. Please provide the dll for these models if they are user-defined models. If not, please remove from the dyr file.
5. PQ curve is missing in the dynamic package. Please provide all the relevant files outlined in DMDG document in dynamic package .zip file.
6. The submitted raw file is provided in PSSE V36. Per DMDG, it is required that PSSE models are provided in PSSE Version 35.3.2.
7. all the PSSE files including .sav, .raw, .cnv, .snp, and .sld files are missing.
8. A complete package in line with PJM DMDG requirements- which includes, but is not limited to, Dynamic Model Report and Dynamic Model Checklist is required.
9. The slack generator in the power flow model is not set according to Section 10.4 of the DMDG.
10. The Station Load (Xs) and Auxiliary Load (Xa) are not modeled in the power flow model.
11. The MVA base of the generator in the power flow model does not match the NextGen data (120 vs. 120.96).
12. R Source (0.0) and X (1.0) Source are not match with 9999.
13. The impedance values of the MPT in NextGen do not match the power flow model.
14. The vector group of the MPT in NextGen is not provided in the power flow model.

All identified deficiencies contained in your Application have been documented in NextGen and will remain available for your review. PJM has provided this access to assist applicants who may wish to continue developing their projects, address outstanding deficiencies, and reapply in a future submission.

PJM will not be conducting individual discussions regarding its determination for applications that have been withdrawn from study consideration. If you are eligible for a refund, complete the Wire Verification Form and email to SystemPlanning.Admin@pjm.com.

Your project refund will be processed after PJM receives the completed Wire Verification Form and the applicable billing process has concluded.

Thank you for your interest in PJM.

Regards,
PJM Planning

Note: This is an automated email. Please do not reply to this message.

ATTACHMENT D

Advantage Renewables

August 7, 2026

CERTIFIED MAIL AND EMAIL

Jason Connell
Vice President, Planning
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403

Re: PJM Cycle 01 Interconnection Queue — Withdrawal of Project C01-1742 (Freshwater Dune); Request for Reinstatement

Dear Mr. Connell:

Advantage Capital Renewables, LLC ("Advantage Renewables"), on behalf of project C01-1742 ("Freshwater Dune"), submits this letter to formally contest the withdrawal notice dated August 3, 2026 (the "Withdrawal Notice") by PJM Interconnection, L.L.C. ("PJM") for Freshwater Dune from the PJM Cycle 01 interconnection queue.

Advantage Renewables' position is that the project satisfied the applicable deficiency-cure obligations and that PJM's Withdrawal Notice is based on deficiencies that were either (a) timely cured during the deficiency-cure period, or (b) impermissibly raised for the first time in the Withdrawal Notice itself without any prior opportunity to cure. Advantage Renewables respectfully requests reinstatement of C01-1742 in the PJM Cycle 01 interconnection queue.

In the alternative, Advantage Renewables requests that PJM meet with Advantage Renewables as soon as possible to discuss the issues discussed herein so that the parties can come to a mutually agreeable resolution and avoid potential litigation before the Federal Energy Regulatory Commission ("FERC").

I. Background

Advantage Renewables submitted its interconnection application for C01-1742 – Freshwater Dune, under PJM Cycle 01, with a cycle application deadline of April 27, 2026.

On June 2, 2026, PJM issued a deficiency notice requesting additional information for C01-1742, with a response deadline of June 17, 2026 (10 business days). The deficiency notice identified issues in the following categories: Attachment Line Data (zero sequence impedance), Project Capability (Dynamic Files and Single Line Diagram), Point of Interconnection (total line length), Transformer Information (missing R0/X0 values), and Site Control & Supporting Docs

(Officer Certification and Evidence of Ownership). Advantage Renewables timely cured those deficiencies within the prescribed deadline.

On August 3, 2026, PJM issued the Withdrawal Notice stating that C01-1742 “has not demonstrated compliance with the requirements set forth in the PJM Tariff to continue study” and that therefore, PJM had withdrawn the project from further study. PJM’s stated basis for withdrawal was that the project “[f]ailed to meet Stability requirements,” citing that “the PD did not provide stability files including the DMDG package at round 1” and that “[i]n round 2 the DMDG package was provided but it is still missing multiple files and has several deficiencies.”

II. Substantive Response to the Withdrawal Notice

A. PJM Approved Site Control and Load Flow Data

Advantage Renewables notes at the outset that PJM’s own internal review confirmed that two categories of the project’s data were satisfactory:

- On June 16, 2026, PJM confirmed: “Load flow data is acceptable and approved.”
- On July 7, 2026, PJM confirmed: “Site Control approved.”

These confirmations establish that Advantage Renewables successfully cured the site control and load flow deficiencies identified in the June 2, 2026 deficiency notice. PJM does not dispute these determinations in the Withdrawal Notice.

B. Short Circuit Data Deficiency Was Raised for the First Time After the Cure Period

On July 7, 2026, well after the June 17, 2026 deficiency-cure deadline had passed, PJM noted for the first time: “Short Circuit Data is Deficient. For wind, solar or battery projects connecting to >= 69 kV, an equivalent collector system should be modeled and provided.”

This short circuit issue was not identified in PJM’s June 2, 2026 deficiency notice. Advantage Renewables was never given an opportunity to cure this deficiency within the prescribed 10 business day cure period. Withdrawing a project on the basis of a deficiency first identified after the cure window has closed is inconsistent with the procedural protections of the PJM Open Access Transmission Tariff, Section 403.

C. Stability Deficiencies Cited in the Withdrawal Notice Were Predominantly New

The Withdrawal Notice cites fourteen (14) stability-related deficiencies (each a “Stability Deficiency”) as the basis for withdrawal, which are listed below:

1. REGCA Lvpnt0/Lvpnt1 values
2. Missing PSSE files (.sav, .raw, .cnv, .snp, .sld)

3. Missing PQ curve from dynamic package
4. FRQTPAT/VTGTPAT models — request for DLL or removal
5. REECC settings (Vp1/Ip1 and VDL curves)
6. Missing plant controller (REPC/PLNTB model)
7. Incorrect PSSE version (Version 36 vs. required Version 35.3.2)
8. Incomplete DMDG package (missing Dynamic Model Report and Checklist)
9. Slack generator configuration (DMDG Section 10.4)
10. Station and auxiliary loads not modeled
11. Generator MVA mismatch (120 vs. 120.96 MVA)
12. Source impedance mismatch (R Source/X Source values)
13. Main Power Transformer impedance mismatch
14. Transformer vector group missing from power flow model

In accordance with direction contained in PJM's June 2, 2026 deficiency notice, Advantage Renewables updated a prescribed value to solve Stability Deficiency No. 1. Moreover, Stability Deficiency Nos. 2-4 were not provided to Advantage Renewables in the June 2, 2026, deficiency review, as evidenced by email correspondence between PJM and Advantage Renewables.[1] Accordingly, other than Stability Deficiency No. 1 (which as noted, was addressed), the remaining thirteen (13) Stability Deficiencies cited in the Withdrawal Notice were identified for the first time on or after July 7, 2026 — after the cure period had expired.

The PJM Tariff's deficiency-cure process is designed to provide applicants with notice of specific deficiencies and a reasonable opportunity to cure them. PJM cannot lawfully withdraw a project on the basis of deficiencies that were never communicated to the applicant during the cure period. Advantage Renewables was denied any opportunity to address these thirteen new items because they were raised only at or after the point of withdrawal.

III. Conclusion

The record demonstrates that Advantage Renewables responded to PJM's June 2, 2026 deficiency notice within the prescribed deadline, that PJM approved the project's load flow data and site control, and that the remaining deficiencies cited in the Withdrawal Notice were not raised in accordance with Section 403 of the PJM Tariff.

Accordingly, Advantage Renewables respectfully requests that PJM reinstate C01-1742 – Freshwater Dune in the Cycle 01 interconnection queue. In the alternative, Advantage Renewables requests that PJM meet with Advantage Renewables as soon as possible to discuss

[1] *See* Attachment A hereto showing relevant email correspondence on this issue.

the issues discussed herein so that the parties can come to a mutually agreeable resolution and avoid potential litigation before FERC.

Advantage Renewables expressly reserves all of its rights and remedies under the PJM Tariff, including but not limited to the right to seek dispute resolution pursuant to the applicable provisions thereof, as well as any and all rights and remedies available under applicable law and equity. Nothing in this letter shall be construed as a waiver of any such rights or remedies.

Respectfully,

Advantage Capital Renewables, LLC

Steven Lichtin
Chief Executive Officer

cc: Donnie Bielak, PJM
Christopher Holt, PJM
Paul Gregory, PJM
Andrew Berrier, Advantage Renewables
Farah Neha, Advantage Renewables
Steven Shparber, Mintz (outside counsel to Advantage Renewables)

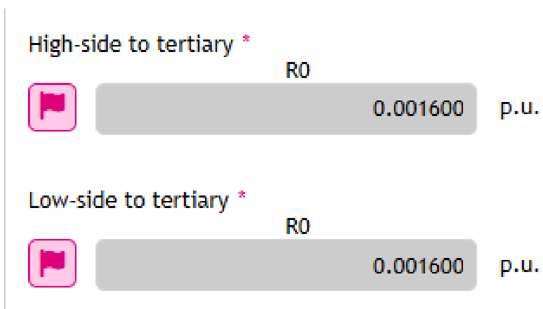
Advantage Renewables

ATTACHMENT A

From: System Planning Admin <SystemPlanning.Admin@pjm.com>
Sent: Tuesday, June 16, 2026 1:42 PM
To: Farah Neha; Gregory, Paul C
Cc: System Planning Admin
Subject: RE: C01-1742 Application Submission

Follow Up Flag: Follow up
Flag Status: Flagged

On the Transformer Information tab under Main Transformer it looks like there are 2 places that you did not comment.



Thank you,

Paula Moore
Sr. Analyst II, Interconnection Projects
(610) 666-2312 | C: (610) 574-5950 | Paula.Moore@pjm.com
PJM Interconnection | 2750 Monroe Blvd. | Audubon, PA 19403

From: Farah Neha <fneha@advantagerenew.com>
Sent: Tuesday, June 16, 2026 12:13 PM
To: Gregory, Paul C <Paul.Gregory@pjm.com>
Cc: System Planning Admin <SystemPlanning.Admin@pjm.com>
Subject: RE: C01-1742 Application Submission

Hi Paul,

I am trying to submit but I am getting error from NextGen saying that all deficiencies must be commented on or submitted before submitting. Can you please help with finding what the issue is?

Thanks,

Farah Neha
SENIOR PROJECT MANAGER

O: 347-609-2352
C: 347-609-2352
fneha@advantagerenew.com · advantagerenew.com

From: Gregory, Paul C <Paul.Gregory@pjm.com>
Sent: Monday, June 15, 2026 7:02 PM
To: Farah Neha <fneha@advantagerenew.com>
Subject: C01-1742 Application Submission

EXTERNAL

He Farah,

This is just a friendly reminder that submittal of the application deficiency cures for C01-1742 is due tomorrow, 6/16/2026. Please be sure to 'submit' at the bottom of the NextGen review tab.

Thank you and please let me know if you have any questions.

Paul Gregory
Contractor, Interconnection Planning Projects
(267) 882-0329 (Mobile) Paul.Gregory@pjm.com
PJM Interconnection | 2750 Monroe Blvd. | Audubon, PA 19403

From: NextGen <nextgen-donotreply@pjm.com>
Sent: Tuesday, June 2, 2026 11:02 PM
To: Farah Neha; tmcnailedn@advantagerenew.com; Steven Lichtin; Anaelle Croteau
Cc: ipadmin@pjm.com; paul.gregory@pjm.com
Subject: NextGen - PJM requests additional information for Freshwater Dune - C01-1742

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL

PJM requests additional information about the data provided for C01-1742 - Freshwater Dune.

Please log into NextGen to address all comments or provide additional information within 10 business days (by close of business on 06/17/2026).

Any request for which a Project Developer or Eligible Customer has not provided satisfactory responses within 10 business days shall be deemed to be terminated and withdrawn. When you access your application, the section(s) containing comments will be marked in the left navigation.

To proceed, please address all comments within the application, including the additional comments listed below, before resubmitting. Please contact your PJM Project Manager (Paul Gregory) with any project-specific questions.

The deficiency comments provided below are not intended to be exhaustive and reflect only the most recent comment for each field. Applicants are responsible for reviewing each deficient field in NextGen and addressing all associated comments to ensure a complete and satisfactory cure.

Attachment Line Data

Total branch zero sequence impedance X0: [Chen-EPE] Short Circuit -Zero sequence reactance X0 of the attachment line is equal to positive sequence reactance X1. Please verify and update.

Total branch zero sequence impedance R0: [Chen-EPE] Short Circuit -Zero sequence resistance R0 of the attachment line is equal to positive sequence resistance R1. Please verify and update.

Project Capability

Dynamic File(s): [EPE - Gavgani] - Stability - REGCA: Lvpnt1 value is recommended to be 0.01 to eliminate unnecessary active-power curtailment. Please provide a brief description on the justification for this selection. Check Lvpnt1 in REGCA module CONs(J+6)

Single line diagram: [Chen-EPE] Short Circuit -The SLD indicates 144 inverters, while NextGen shows 576 inverters. Please confirm the correct number and clarify how the 576 inverters are represented on the SLD.

Point of Interconnection

Total length of line: Total length of the line is 14.99 miles. Please update the total line miles and the distances from Substation A and B as needed.

Transformer Information

X0: [Chen-EPE] Short Circuit -The High-side to tertiary R0 and X0 values of MPT are missing in NextGen . Please verify and update.

R0: [Chen-EPE] Short Circuit -The R0 and X0 values of GSU are missing in NextGen . Please verify and update.

R0: [Chen-EPE] Short Circuit -The low-side to tertiary R0 and X0 values of GSU are missing in NextGen . Please verify and update.

X0: [Chen-EPE] Short Circuit -The low-side to tertiary R0 and X0 values of MPT are missing in NextGen . Please verify and update.

X0: [Chen-EPE] Short Circuit -The R0 and X0 values of GSU are missing in NextGen . Please verify and update.

R0: [Chen-EPE] Short Circuit -The High-side to tertiary R0 and X0 values of GSU are missing in NextGen . Please verify and update.

Site Control & Supporting Docs

Officer Certification Form: Project Developer to provide an updated Officer Certification containing the mineral rights paragraph in full. Refer to the additional comments section in the NextGen review tab for further details.

Evidence of Ownership: Developer needs to supply evidence of the payment required to extend the Site control term to the required date of April 27,2027. Refer to the 'additional comments' section for further details.

Additional Comments:

05/06/2026 (PJM SC- AMR): Short Circuit data is deficient. Please see comments in NextGen and address deficiencies during cure period.

05/08/2026 [EPE - Mostajeran] - Stability data is deficient.

05/21/2026 (PG): The site control document is an Energy Storage Option to Lease and Land Lease with an effective date of January 15, 2025. Per Section 2.1(a), the agreement provides an initial five-year Option Period, notionally ending January 14, 2030. However, Section 3.1 conditions the continuation of this Option Period on annual 'Option Rent' payments due on each anniversary of the effective date. To maintain site control through the required date of April 27, 2027, an Option Rent payment is required on or before January 15, 2027. Section 9.1 allows the Lessor to terminate the agreement for failure to make these payments. As the required payment is a future obligation and no evidence of its fulfillment has been provided, the site control term is not guaranteed through the required date of April 27, 2027. Project Developer needs to supply evidence of the payment required to extend the Site control term to the required date of April 27,2027.

05/21/2026 (PG): Section 5.5 of the Option states that: (i) Lessor holds rights to the oil, gas or mineral estate of the subject property; (ii) the Option does not confirm that Lessor will not interfere with Project Developer's rights under the Option; and (iii) the Officer Certification provided by Project Developer does not contain the appropriate mineral rights certification language. Project Developer to provide an updated Officer Certification containing the following language: "I certify that the absence of mineral rights does not preclude the ability of the Project Developer from constructing or operating the Generating Facility, including all MWs indicated in the Interconnection Request. Additionally, I certify that no third-party, including without limitation, any developer of the mineral estate, has the right to use or occupy any portion of the surface estate of the Site that Project Developer has submitted for Site Control, nor does any third-party have the right to place on the surface of such property any facilities, fixtures, equipment, building, structures, pipelines, rights of way or personal property of any kind or nature whatsoever that would interfere with the Project Developer's exclusive use and control of any of the Site properties for the Generating Facility."

05/30/2026 (PJM LF - SJB): Load flow data is deficient. Please see comments in POI section.

Legal Comments: None

Thank you,

PJM Planning

Note: This is an auto-generated email. Do not reply to this email.

ATTACHMENT E

From: Bielak, Donnie <Donnie.Bielak@pjm.com>
Sent: Friday, August 7, 2026 11:37 AM
To: Steven Lichtin <slichtin@advantagerenew.com>; Connell, Jason P. <Jason.Connell@pjm.com>
Cc: Holt, Christopher <Christopher.Holt@pjm.com>; Gregory, Paul C <Paul.Gregory@pjm.com>; Shparber, Steven <SShparber@mintz.com>; Andrew Berrier <aberrier@advantagerenew.com>; Farah Neha <fneha@advantagerenew.com>
Subject: RE: Letter regarding Freshwater Dune (C01-1742) Withdrawal from Queue

Hi Steven,

PJM can confirm that a cure package was submitted for this project however, after review it was determined that deficiencies still remained.

Please refer to Tariff, Part VIII, section 403(B) which governs the deficiency review process. In accordance with that process, an Applicant has 10 Business Days to respond to the deficiencies identified by PJM, and then PJM must use Reasonable Efforts to review Applicant's response within 15 Business Days, and then "either validate or reject the Application." The deficiency review process set forth in the Tariff does not afford an Applicant with another opportunity to cure deficiencies that remain following a Project Developer's deficiency response. Tariff, Part VIII, section 403(B).

Accordingly, your New Service Request was withdrawn from Cycle 01.

Thank you.

Donnie Bielak
PJM Interconnection
Director, Interconnection Planning
610-666-4734
donnie.bielak@pjm.com

From: Steven Lichtin <slichtin@advantagerenew.com>
Sent: Friday, August 7, 2026 10:10 AM
To: Connell, Jason P. <Jason.Connell@pjm.com>
Cc: Bielak, Donnie <Donnie.Bielak@pjm.com>; Holt, Christopher <Christopher.Holt@pjm.com>; Gregory, Paul C <Paul.Gregory@pjm.com>; Shparber, Steven <sshparber@mintz.com>; Andrew Berrier <aberrier@advantagerenew.com>; Farah Neha <fneha@advantagerenew.com>
Subject: Letter regarding Freshwater Dune (C01-1742) Withdrawal from Queue

Hi Jason,

Please see the attached letter in regards to Freshwater Dune's withdrawal from Cycle 01. We can make ourselves available to discuss with PJM at your earliest convenience. This is a high priority for the company and so we appreciate your prompt attention to the matter.

Regards,
Steven

--
Steven Lichtin
CHIEF EXECUTIVE OFFICER
O: 646-685-8755
C: 646-706-1589
E: slichtin@advantagerenew.com
advantagerenew.com [advantagerenew.com]
Advantage Renewables

ATTACHMENT F

From: Shparber, Steven
Sent: Wednesday, August 12, 2026 12:05 PM
To: Lai, Erin <erin.lai@pjm.com>; Winther, Caroline E <caroline.winther@pjm.com>
Cc: Steven Lichtin <slichtin@advantagerenew.com>; Andrew Berrier <aberrier@advantagerenew.com>; 'Connell, Jason P.' <Jason.Connell@pjm.com>; Bielak, Donnie <donnie.bielak@pjm.com>; Farah Neha <fneha@advantagerenew.com>; Holt, Christopher <christopher.holt@pjm.com>
Subject: Notice of Dispute- Freshwater Dune (C01-1742) Withdrawal from Queue
Importance: High

Good afternoon Erin and Caroline, please be advised that Advantage Capital Renewables, LLC ("Advantage Renewables"), on behalf of project C01-1742 ("Freshwater Dune"), is hereby submitting this Notice of Dispute pursuant to Section 12.1 of the PJM Tariff. Please note that the attached letter (and email below) were sent to PJM on August 7, but based on feedback I received this morning from Chris Holt, PJM prefers that we invoke the ADR process to address this dispute.

Please let us know PJM's availability to meet at your earliest convenience. Thank you and we look forward to speaking.

From: Steven Lichtin <slichtin@advantagerenew.com>
Sent: Friday, August 7, 2026 10:10 AM
To: Jason.Connell@pjm.com
Cc: Donnie.Bielak@pjm.com; Holt, Christopher <christopher.holt@pjm.com>; Paul.Gregory@pjm.com; Shparber, Steven <SShparber@mintz.com>; Andrew Berrier <aberrier@advantagerenew.com>; Farah Neha <fneha@advantagerenew.com>
Subject: Letter regarding Freshwater Dune (C01-1742) Withdrawal from Queue

Hi Jason,

Please see the attached letter in regards to Freshwater Dune's withdrawal from Cycle 01. We can make ourselves available to discuss with PJM at your earliest convenience. This is a high priority for the company and so we appreciate your prompt attention to the matter.

Regards,
Steven

--
Steven Lichtin
CHIEF EXECUTIVE OFFICER
O: 646-685-8755
C: 646-706-1589
E: slichtin@advantagerenew.com
advantagerenew.com
Advantage Renewables

ATTACHMENT G

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Steven Lichtin
CHIEF EXECUTIVE OFFICER
O: 646-685-8755
C: 646-706-1589
E: slichtin@advantagerenew.com
advantagerenew.com
Advantage Renewables

From: Evan Vaughan <evaughan@marec.us>
Date: Friday, August 14, 2026 at 2:20 PM
To: Caroline Fletcher <cfletcher@marec.us>; Diane Cherry <dcherry@marec.us>; Evelyn Robinson <erobinson@marec.us>; Mcyphers@cleanpower.org <Mcyphers@cleanpower.org>; jayce.walker@recurrentenergy.com <jayce.walker@recurrentenergy.com>; zander.bischof@mn8energy.com <zander.bischof@mn8energy.com>; nick.benjamin@clearwayenergy.com <nick.benjamin@clearwayenergy.com>; yinghuang.ji@mn8energy.com <yinghuang.ji@mn8energy.com>; rmartini@invenergy.com <rmartini@invenergy.com>; MVOYT@orsted.com <MVOYT@orsted.com>; Anna.Rodger@clearwayenergy.com <Anna.Rodger@clearwayenergy.com>; rajat.pungaliya@clearwayenergy.com <rajat.pungaliya@clearwayenergy.com>; rsteichen@revrenewables.com <rsteichen@revrenewables.com>; sjackson@formenergy.com <sjackson@formenergy.com>; tyson.utt@cepsolar.com <tyson.utt@cepsolar.com>; Francesca.Callicotte@terraformpower.com <Francesca.Callicotte@terraformpower.com>; nicole.affleck@lineaenergy.com <nicole.affleck@lineaenergy.com>; jenn.manelski@lineaenergy.com <jenn.manelski@lineaenergy.com>; lindsay.broughel@lineaenergy.com <lindsay.broughel@lineaenergy.com>; luke.somers@apexcleanenergy.com <luke.somers@apexcleanenergy.com>; lpari@orsted.com <lpari@orsted.com>; chris.lazinski@baywa-re.com <chris.lazinski@baywa-re.com>; noorgul.dada@lightsourcebp.com

<noorgul.dada@lightsourcebp.com>; jshannon@swiftcurrentenergy.com <jshannon@swiftcurrentenergy.com>; emma.nix@edf-re.com <emma.nix@edf-re.com>; udit.gupta@lightsourcebp.com <udit.gupta@lightsourcebp.com>; smartin@revrenewables.com <smartin@revrenewables.com>; Andrew.Dahlen@edf-re.com <Andrew.Dahlen@edf-re.com>; hannah.muller@clearwayenergy.com <hannah.muller@clearwayenergy.com>; mandy.pitz@clearwayenergy.com <mandy.pitz@clearwayenergy.com>; david.weightman@clearwayenergy.com <david.weightman@clearwayenergy.com>; chris.gordon@baywa-re.com <chris.gordon@baywa-re.com>; thomas.carlson@edf-re.com <thomas.carlson@edf-re.com>; cacl@equinor.com <cacl@equinor.com>; julia.ilhardt@lineaenergy.com <julia.ilhardt@lineaenergy.com>; ptully@savionenergy.com <ptully@savionenergy.com>; amit.barnir@zenobe.com <amit.barnir@zenobe.com>; laurence.copson@zenobe.com <laurence.copson@zenobe.com>; mdaley@carbonsolutionsgroup.com <mdaley@carbonsolutionsgroup.com>; grant.glazer@mn8energy.com <grant.glazer@mn8energy.com>; david.holly@baywa-re.com <david.holly@baywa-re.com>; jake.steinman@baywa-re.com <jake.steinman@baywa-re.com>; Sari Fink <sfink@marec.us>; ben.spear@urbangridco.com <ben.spear@urbangridco.com>; jason.hathcock@cepsolar.com <jason.hathcock@cepsolar.com>; Parker Sloan <psloan@advantagerenew.com>; Steven Lichtin <slichtin@advantagerenew.com>; rbehrens@flatiron.energy <rbehrens@flatiron.energy>; Summer.Lanier@zenobe.com <Summer.Lanier@zenobe.com>; vpaschal@cordeliopower.com <vpaschal@cordeliopower.com>; tdelafield@delafieldenergy.com <tdelafield@delafieldenergy.com>; sdrew@delafieldenergy.com <sdrew@delafieldenergy.com>; mdelafield@delafieldenergy.com <mdelafield@delafieldenergy.com>; Shannon.Meyer-Johanson@patternenergy.com <Shannon.Meyer-Johanson@patternenergy.com>; kirk.johnson@cepsolar.com <kirk.johnson@cepsolar.com>; JWagner@TENASKA.com <JWagner@TENASKA.com>; Michael.Weiner@fluenceenergy.com <Michael.Weiner@fluenceenergy.com>; wmitchell@elevaterenewables.com <wmitchell@elevaterenewables.com>; AGhodsian@invenergy.com <AGhodsian@invenergy.com>; JRadl@invenergy.com <JRadl@invenergy.com>; RWagner@invenergy.com <RWagner@invenergy.com>; jboyd@revrenewables.com <jboyd@revrenewables.com>; MJS@exus.us <MJS@exus.us>; kharrington@geronimopower.com <kharrington@geronimopower.com>; csnider@geronimopower.com <csnider@geronimopower.com>; nluckey@invenergy.com <nluckey@invenergy.com>; john.brodbeck@edp.com <john.brodbeck@edp.com>; kate.mckeever@rwe.com <kate.mckeever@rwe.com>; Matthew.Lloyd@baywa-re.com <Matthew.Lloyd@baywa-re.com>; kevin.kilgallen@avangrid.com <kevin.kilgallen@avangrid.com>; Paulina O'Connor <poconnor@marec.us>; brian.oboyle@nationalgrid.com <brian.oboyle@nationalgrid.com>; scott.coenen@avangrid.com <scott.coenen@avangrid.com>; jasmm@vestas.com <jasmm@vestas.com>; caleb.gaddes@lightsourcebp.com <caleb.gaddes@lightsourcebp.com>; kofi.larbi@lightsourcebp.com <kofi.larbi@lightsourcebp.com>; adam.sokolski@edf-re.com <adam.sokolski@edf-re.com>; MELC@equinor.com <MELC@equinor.com>; jenny.briot@rwe.com <jenny.briot@rwe.com>; karthik.mekala@rwe.com <karthik.mekala@rwe.com>; temujin.roach@edf-re.com <temujin.roach@edf-re.com>; RTaylor@invenergy.com <RTaylor@invenergy.com>; mzappia@swiftcurrentenergy.com <mzappia@swiftcurrentenergy.com>; g.gotiangco@uswindinc.com <g.gotiangco@uswindinc.com>; andrew.house@mn8energy.com <andrew.house@mn8energy.com>; will.callaway@baywa-re.com <will.callaway@baywa-re.com>; dprice@hexagon-energy.com <dprice@hexagon-energy.com>; fhodsoll@solunesco.com <fhodsoll@solunesco.com>; henry.weitzner@waldenrenewables.com <henry.weitzner@waldenrenewables.com>; Caitlin.Gaynor@clearwayenergy.com <Caitlin.Gaynor@clearwayenergy.com>; sam.laskin@waldenrenewables.com <sam.laskin@waldenrenewables.com>; jack.kenworthy@waldenrenewables.com <jack.kenworthy@waldenrenewables.com>;

brad.pierson@waldenrenewables.com <brad.pierson@waldenrenewables.com>;
ben.orcutt@waldenrenewables.com <ben.orcutt@waldenrenewables.com>;
elizabeth.savage@AES.COM <elizabeth.savage@AES.COM>; katherine.bennett@aes.com
<katherine.bennett@aes.com>; amy.lobel@aes.com <amy.lobel@aes.com>;
austin.debutts@terraformpower.com <austin.debutts@terraformpower.com>;
geoff.suttle@terraformpower.com <geoff.suttle@terraformpower.com>;
danny.vanclief@terraformpower.com <danny.vanclief@terraformpower.com>;
BStaples@TENASKA.com <BStaples@TENASKA.com>; Heidi.Ratz@patternenergy.com
<Heidi.Ratz@patternenergy.com>; tate.memory@waldenrenewables.com
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<kzhu@elevaterenewables.com>; ktalbot@elevaterenewables.com
<ktalbot@elevaterenewables.com>; Samantha.Huang@fluenceenergy.com
<Samantha.Huang@fluenceenergy.com>; kuda.muskwe@waldenrenewables.com
<kuda.muskwe@waldenrenewables.com>; pablo.taccioli@fluenceenergy.com
<pablo.taccioli@fluenceenergy.com>; MBonacci@TENASKA.com <MBonacci@TENASKA.com>; Aaron
Steely <asteely@advantagerenew.com>; caroline.tkachuk@totalenergies.com
<caroline.tkachuk@totalenergies.com>; Jayne.Gelman@baywa-re.com <Jayne.Gelman@baywa-
re.com>; jmayoral@sofospower.com <jmayoral@sofospower.com>; afukuchi@sofospower.com
<afukuchi@sofospower.com>; jgerigk@sofospower.com <jgerigk@sofospower.com>;
jkotwicki@sofospower.com <jkotwicki@sofospower.com>; Andrew.Dahlen@edf-re.com
<Andrew.Dahlen@edf-re.com>; Regan.Fink@clearwayenergy.com <Regan.Fink@clearwayenergy.com>;
Reid.Sims@nexteraenergy.com <Reid.Sims@nexteraenergy.com>; Kaley.Bangston@nexteraenergy.com
<Kaley.Bangston@nexteraenergy.com>; Collin.Lomagistro@nexteraenergy.com
<Collin.Lomagistro@nexteraenergy.com>; Michelle.Gardner@nexteraenergy.com
<Michelle.Gardner@nexteraenergy.com>; dmarengo@tenaska.com <dmarengo@tenaska.com>;
jharrington@flatiron.energy <jharrington@flatiron.energy>; Steven.Greco@nexteraenergy.com
<Steven.Greco@nexteraenergy.com>; ndios@carbonsolutionsgroup.com
<ndios@carbonsolutionsgroup.com>; Olivia.Watkins@nexteraenergy.com
<Olivia.Watkins@nexteraenergy.com>; Adam.Stern@clearwayenergy.com
<Adam.Stern@clearwayenergy.com>; katherine.disanto@lightsourcebp.com
<katherine.disanto@lightsourcebp.com>; petya.miteva@baywa-re.com <petya.miteva@baywa-
re.com>; GJorgensen@elevaterenewables.com <GJorgensen@elevaterenewables.com>;
HAronson@invenergy.com <HAronson@invenergy.com>; rrussell@elevaterenewables.com
<rrussell@elevaterenewables.com>; Christian.Hofer@cci.com <Christian.Hofer@cci.com>;
Keefer.Douglas@cci.com <Keefer.Douglas@cci.com>; Jonathan Pike <jpike@advantagerenew.com>;
Greg.Giunta@hanwhaenergyusa.com <Greg.Giunta@hanwhaenergyusa.com>;
max.sablosky@174powerglobal.com <max.sablosky@174powerglobal.com>;
Christopher.Osman@174powerglobal.com <Christopher.Osman@174powerglobal.com>;
rob.lacount@rwe.com <rob.lacount@rwe.com>; akua.mcleod@exus.us <akua.mcleod@exus.us>;
ben.silliman@apexcleanenergy.com <ben.silliman@apexcleanenergy.com>;
jeffrey.barrett@apexcleanenergy.com <jeffrey.barrett@apexcleanenergy.com>;
bwhite@cleanpower.org <bwhite@cleanpower.org>; cameron.eibl@edf-re.com <cameron.eibl@edf-
re.com>; nicholas.lucania@edf-re.com <nicholas.lucania@edf-re.com>;
James.Lester@fluenceenergy.com <James.Lester@fluenceenergy.com>;
MMatthews@revrenewables.com <MMatthews@revrenewables.com>
Cc: Sari Fink <sfink@marec.us>; Evelyn Robinson <erobinson@marec.us>
Subject: PJM Cycle 1 deficiency cure process question

EXTERNAL

Hello MAREC PJM committee, a member just raised for us inconsistency with the deficiency cure process across Cycle 1 projects. Some of this member's projects were withdrawn after the initial deficiency response period, while the other projects received additional feedback identifying remaining deficiencies and an opportunity to address them before being accepted. In short, inconsistent treatment and no explanation.

Has anyone else experienced this? If it's a wider problem we can dig into it.

Evan Vaughan, Executive Director
MAREC Action
PO Box 3335
Silver Spring, MD 20918
(202) 431-4640
evaughan@marec.us
MAREC Action (informally, "Mid-Atlantic Renewable Energy Coalition") is a non-profit advocacy organization representing over 50 utility-scale solar, wind, and battery storage developers and manufacturers dedicated to the growth and development of renewable energy across the PJM grid region.

ATTACHMENT H

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Advantage Capital Renewables, LLC, **Complainant,** **v.** **PJM Interconnection, L.L.C.,** **Respondent.**	)	**Docket No. EL26-_________**

NOTICE OF COMPLAINT

(   )

Take notice that on August 25, 2026, Advantage Capital Renewables, LLC ("Advantage Renewables") filed a formal complaint (the "Complaint") against PJM Interconnection, L.L.C. ("PJM" or "Respondent") pursuant to Sections 206, 306, and 309 of the Federal Power Act ("FPA"), 16 U.S.C. §§ 824e, 825e, 825h (2024), and Rules 206 and 212 of the Federal Energy Regulatory Commission's ("Commission" or "FERC") Rules of Practice and Procedure, 18 C.F.R. §§ 385.206 and 385.212 (2026).

In its Complaint, Advantage Renewables asserts that PJM has acted unjustly, unreasonably, and in an unduly discriminatory manner by impermissibly withdrawing Advantage Renewables' planned 100 MW energy storage project (Queue No. C01-1742, the "Freshwater Dune Project") from Cycle 01 of PJM's interconnection study process.

Advantage Renewables requests that the Commission: (1) find that PJM's termination and withdrawal of the Freshwater Dune Project from the Cycle 01 interconnection queue violated Section 403 of the PJM Open Access Tariff and was therefore unjust, unreasonable, and unduly discriminatory; (2) direct PJM to reinstate the Freshwater Dune Project in the Cycle 01 interconnection queue with its original queue position preserved; (3) grant fast-track processing and shorten the period for answers, interventions, and comments; and (4) order such further relief as the Commission deems necessary and appropriate.

Advantage Renewables certifies that copies of the Complaint were served on the

Respondent's contacts listed on the Commission's list of Corporate Officials.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 C.F.R. §§ 385.211 and 385.214 (2026)). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. The Respondent's answer and all interventions, or protests must be filed on or before the comment date. The Respondent's answer, motions to intervene, and protests must be served on the Complainant.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the "eFiling" link at http://www.ferc.gov. Persons unable to file electronically should submit an original and 5 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426.

This filing is accessible on-line at http://www.ferc.gov, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, DC. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: 5:00 pm Eastern Time on (insert date).

Kimberly D. Bose,
Secretary.

Document Content(s)