

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

Advantage Capital Renewables, LLC,	)	
Complainants,	)	
	)	
v.	)	Docket No. EL26-99-000
	)	
PJM Interconnection, L.L.C.,	)	
Respondent.	)	

ANSWER OF PJM INTERCONNECTION, L.L.C.

PJM Interconnection, L.L.C. (“PJM”), pursuant to Rule 213 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure¹ and the Commission’s August 26, 2026 Notice of Filing,² submits this answer to the Complaint filed by Advantage Capital Renewables, LLC (“Advantage Renewables” or “Complainant”), in the above-captioned proceeding.³ Advantage Renewables has not shown that PJM violated the Federal Power Act (“FPA”) or the PJM Open Access Transmission Tariff (“Tariff”)⁴ in rejecting its New Service Request, when it did not resolve the deficiencies identified during the Application Review Phase and provide PJM with a working model for its proposed Generating Facility. Accordingly, the Commission should reject the Complaint.

¹ 18 C.F.R. § 385.213.

² Combined Notice of Filings #1, Docket Nos. EL26-99-000, et al. (Aug. 26, 2026); Errata Notice Shortening Comment Period, Docket No. EL26-99-000 (Aug. 31, 2026).

³ *Advantage Capital Renewables, LLC v. PJM Interconnection, L.L.C.*, Complaint and Request for Fast-Track Processing of Advantage Capital Renewables, LLC, Docket No. EL26-99-000 (Aug. 25, 2026) (“Complaint”).

⁴ Terms not otherwise defined in this answer shall have the meaning set forth in the Tariff.

The facts underlying this dispute are straightforward. PJM reviewed Complainant's application for its C01-1742 Freshwater Dune Project ("Application") and raised several deficiencies, of which Complainant was notified and required to resolve within the Tariff-prescribed timeframe.⁵ Following the cure period, PJM reviewed Complainant's deficiency responses and found that there were a number of deficiency comments (eight in total) that Complainant did not resolve. As further described below, it is because of these unresolved deficiencies that were identified in the June 2, 2026 deficiency notice, and these reasons alone, that the Application was rejected and the Freshwater Dune Project withdrawn from Cycle 01. Despite Complainant's assertions, PJM did not deviate from its Application Review Phase procedures as prescribed in the Tariff.⁶ Nor does Complainant allege that the Tariff is unjust, unreasonable, unduly discriminatory or preferential. Accordingly, the Commission should dismiss the Complaint.

Not only does Complainant fail to meet its burden under FPA section 206, but its request to delay Cycle 01 to accommodate reinstatement of its deficient Application would inject uncertainty into the interconnection process by introducing compounding uncertainty into Cycle timelines. The Commission therefore should deny the Complaint.

I. BACKGROUND

A. Application Requirements and Deficiency Review Under Tariff, Part VIII

Beginning with Cycle 01, Project Developers seeking to interconnect to the PJM Transmission System are subject to the requirements of Tariff, Part VIII.⁷ To be considered in a Cycle, all Project Developers must submit a Completed Application that includes all

⁵ Exhibit 1 – Deficiency Notice and Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

⁶ See generally Tariff, Part VIII, Subpart A, section 401.

⁷ Tariff, Part VIII, Subpart B, section 403(A).

information required under the Tariff prior to the Cycle’s Application Deadline, as detailed further in the Application and PJM’s Manuals.⁸ PJM reviews, and validates or rejects, each New Service Request during the Application Phase, prior to proceeding to Phase I of the corresponding Cycle.⁹ If an Application does not satisfy the requirements for a Completed Application, it will not proceed beyond the Application Phase of a Cycle.¹⁰

As relevant to the Complaint, a Completed Application must “[s]pecify the proposed voltage and nominal capability of new facilities” and “[p]rovide a detailed description of the equipment configuration and electrical design specifications for the project.”¹¹ In order to produce such specifications, Applicants must submit a dynamic model for each New Service Request. The dynamic model is used to perform stability studies, which measure disturbances in power flows from the specific generator being studied. Stability studies are essential to ensure that a proposed Generating Facility does not create disturbances on the grid, which could lead to other generators tripping offline in rapid succession and cause reliability concerns. Stability studies also ensure that each Generating Facility in a Cycle is designed and built in accordance with applicable North American Electric Reliability Corporation (“NERC”), PJM, and Transmission Owner standards.¹² Once an Applicant’s dynamic model is tested and validated, it is then used to

⁸ Tariff, Part VIII, Subpart B, section 403(A).

⁹ *Id.*

¹⁰ *Id.* (PJM “will review and validate New Service Requests Only valid New Service Requests will proceed past the Application Phase.”).

¹¹ Tariff, Part VIII, Subpart B, section 403(A)(4)(c), (d).

¹² Interconnection Analysis & Interconnection Planning Analysis Departments, *PJM Dynamic Model Development Guidelines for Interconnection Analysis*, PJM Interconnection, L.L.C., section 2.0 (rev. 2.1, Mar. 10, 2026), <https://www.pjm.com/-/media/DotCom/planning/services-requests/pjm-dynamic-model-development-guidelines.ashx>.

build a model of the entire Cycle (i.e., the Cycle 01 Base Case), which is used in the interconnection studies in future Phases of the process.

Dynamic model data must be submitted in accordance with the PJM Dynamic Model Development Guidelines for Interconnection Analysis (“DMDG”),¹³ which is available for public review on the PJM website.¹⁴ Section 7.3 of the DMDG requires that the power flow and dynamic models “*for any type of generator* must be usable by the Siemens PTI PSS/E [(“PSSE”)] software platform to perform the simulation.”¹⁵ PJM Manual 14H, which provides additional guidance on Application requirements, further reiterates the importance of complying with the DMDG and specifically states that failure to adhere to the requirements will result in withdrawal.¹⁶ Importantly, while revisions to the DMDG have occurred since their adoption in 2023, the substantive requirements, including the requirement to submit a model that is usable by the PSSE software, have remained largely unchanged.¹⁷

After the close of the Application Deadline, PJM begins the Application Review Phase, wherein it evaluates all Applications from Project Developers to determine whether

¹³ Interconnection Projects Department, *PJM Manual 14H: New Service Requests Cycle Process*, PJM Interconnection, L.L.C., section 2.1.2 (rev. 06, Aug. 19, 2026) <https://www.pjm.com/-/media/DotCom/documents/manuals/m14h.pdf> (“PJM Manual 14H”) (“Modeling Data required for Stability analysis must be provided with the submitted application in PJM data submission tool.”).

¹⁴ *See generally id.*

¹⁵ DMDG, section 7.3 (emphasis added). PSSE is an engineering software package produced by Siemens. It is used by PJM to perform transient stability analysis. The DMDG states that “dynamic models and files provided must be compatible” with the PSSE software version being used for the applicable Cycle.

¹⁶ PJM Manual 14H at section 2.1.2 (“Modeling Data required for Stability analysis must be provided with the submitted application in PJM data submission tool. Project Developers shall follow PJM Dynamic Model Development Guidelines on the PJM website to submit stability data specific to their project. Project Developers should pay special attention to PJM Dynamic Model Development Guidelines to ensure all deliverables are met. If stability data submission is not approved at the end of the deficiency review period, the application will be withdrawn.”).

¹⁷ *See* DMDG, section 1.0 (providing revision history).

deficiencies are present, including deficiencies with the dynamic model. The Application Review Phase spelled out in Tariff, Part VIII, Subpart B, section 403, is as follows:

1. [PJM] exercises Reasonable Efforts to inform Applicant of Application deficiencies within 15 Business Days after the Application Deadline.
2. Applicant then has 10 Business Days to respond to PJM's deficiency determination.
3. [PJM] exercises Reasonable Efforts to review Applicant's response within 15 Business Days, and then will either validate or reject the Application.¹⁸

Although Cycle 01 is the first Cycle to be processed under Tariff, Part VIII, the deficiency review process has not meaningfully changed from PJM's prior interconnection processes,¹⁹ nor Transition Cycles #1 and #2.²⁰ As PJM explained to the Commission in proposing the reforms that resulted in the Cycle process, the single deficiency review, along with the single response opportunity, serves as a critical gate that is consistent with the goal of moving the interconnection process along faster by embracing and enforcing a "first-ready, first-served" consideration. The single 10 Business Day deficiency review process reinforces the goal of ensuring that submitted New Service Requests meet the requirement to be "first-ready" so that they can be "first-served" through a Cycle process that moves forward consistent with Tariff-imposed deadlines.²¹ The deficiency review process is also

¹⁸ Tariff, Part VIII, Subpart B, section 403(B)(1)(a)-(c).

¹⁹ See, e.g., *PJM Interconnection, L.L.C.*, Tariff Revisions for Interconnection Process Reform, Request for Commission Action by October 3, 2022, and Request for 30-Day Comment Period, at 3 (June 14, 2022) ("IPRTF Filing") (citing reforms adopted in Docket Nos. ER16-2518-000, -001, in which PJM filed revised tariff provisions to address delays in the interconnection process by revising its application deficiency rules to increase efficiency and shorten the time for an Interconnection Customer to receive a Queue Position).

²⁰ Tariff, Part VII, Subpart C, section 306(B).

²¹ See IPRTF Filing at 1, 47.

repeated in future Phases of a Cycle, using the same timeline, to prevent projects from tying up valuable headroom on the Transmission System that potentially could have been used for other, viable projects.²²

B. The Freshwater Dune Project C01-1742

The Freshwater Dune Project is a proposed 100-megawatt battery storage facility.²³ Complainant submitted its Application for the Freshwater Dune Project for Cycle 01. Consistent with the Tariff requirements, PJM issued a deficiency notice to Complainant on June 2, 2026 (“Deficiency Notice”), identifying certain deficiencies and indicating that,

[t]he 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.²⁴

As noted, Complainant was directed to refer to NextGen²⁵ for the complete list of deficiency comments. The deficiency comments at issue here, were incorporated into NextGen between May 7-8, 2026,²⁶ prior to PJM issuing the Deficiency Notice on June 2, 2026.²⁷ Accordingly the comments in NextGen were available for the Complainant’s review during the cure period. The Deficiency Notice requested that

²² IPRTF Filing at 47 (explaining the need for gating mechanisms to deter speculation); *see also PJM Interconnection, L.L.C.*, 181 FERC ¶ 61,162 (2022) (accepting interconnection process reforms), *order on reh’g*, 184 FERC ¶ 61,006 (2023), *aff’d sub nom., Hecate Energy LLC v. FERC*, 126 F.4th 660 (D.C. Cir. 2025).

²³ Complaint at 5.

²⁴ The Deficiency Notice is attached to this Answer, as Exhibit 1 – Deficiency Notice (emphasis added).

²⁵ NextGen is PJM’s online platform through which Project Developers submit and manage Applications and supporting information, receive PJM comments, respond to identified deficiencies, and monitor Application status.

²⁶ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

²⁷ Exhibit 1 – Deficiency Notice.

Complainant remedy these issues within ten business days (i.e., June 17, 2026), as required by the Tariff,²⁸ to ensure the model submitted was free from initialization and other errors.²⁹

On June 16, 2026, Complainant submitted its responses to its Deficiency Notice in NextGen (“Deficiency Responses”). Thereafter, PJM initiated its review and identified that the Deficiency Responses did not resolve the deficiencies identified in the Deficiency Notice.³⁰ Given that Complainant’s Deficiency Responses did not cure the deficiencies identified in the Deficiency Notice, PJM could not validate the Application. In accordance with the Tariff, PJM was required to reject the Application.³¹

On August 3, 2026, PJM issued a notice, informing Complainant of its decision to reject its Application and withdraw the project from Cycle 01 (“Withdrawal Notice”).³² As depicted below, the Withdrawal Notice highlighted the deficiencies that were not cured within the cure period, which served as the basis for the withdrawal.

Figure 1: Withdrawal Notice³³

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:

²⁸ Tariff, Part VIII, Subpart B, section 403(B)(1)(b).

²⁹ Exhibit 1 – Deficiency Notice.

³⁰ A table summarizing the original deficiency comments, the shortcomings in the Complainant’s Deficiency Responses and the connection of that inadequate Deficiency Response to the withdrawal decision is attached to the Answer as Exhibit 3 – Table Summary of Inadequate Deficiency Responses.

³¹ Tariff, Part VIII, Subpart B, section 403(B)(1)(c).

³² The Withdrawal Notice is attached to this Answer as Exhibit 5 – Withdrawal Notice.

³³ Exhibit 5 – Withdrawal Notice. The Withdrawal Notice also listed a number of newly identified deficiencies, which Complainants claim should have been identified with the Deficiency Notice. In its Application, Complainant did not submit its .raw file in a format that was compatible with the PSSE software platform, as PJM requires. After the Deficiency Review process, PJM was able to view the .raw file and

II. ANSWER TO COMPLAINT

Under section 206(b) of the FPA, “the burden of proof to show that any rate, charge, classification, rule, regulation, practice, or contract is unjust, unreasonable, unduly discriminatory, or preferential shall be upon . . . the complainant.”³⁴ In addition, FPA section 306 states that “[a]ny person . . . complaining of anything done or omitted to be done by any . . . public utility in contravention of the provisions of this chapter may apply to the Commission by petition which shall briefly state the facts.”³⁵ This burden consists of coming forward with a *prima facie* case.³⁶ To establish a *prima facie* case in a section 206 proceeding, the complainant must identify the alleged action or inaction that violates the specific standard or requirement as well as provide evidence as to how that action or inaction violates the standard.³⁷

Complainant alleges that PJM unjustly and unreasonably withdrew its project from Cycle 01, in violation of the Tariff.³⁸ The Freshwater Dune Project was withdrawn because

subsequently provided these “newly identified deficiencies” in the Withdrawal Notice. Since PJM had already issued the Deficiency Notice on June 2, 2026 and Complainant had responded with its Deficiency Responses, the “newly identified deficiencies” provided in the Withdrawal Notice were advisory in nature and intended to provide guidance in the event Complainant chooses to apply its Project in a future cycle.

³⁴ 16 U.S.C. § 824e(b).

³⁵ 16 U.S.C. § 825e.

³⁶ See, e.g., *Wholesale Customers of Ohio Edison Co. v. Ohio Edison Co.*, 22 FERC ¶ 61,314 (1983); *Coal. of Eastside Neighborhoods for Sensible Energy v. Puget Sound Energy, Inc.*, 183 FERC ¶ 61,057, at P 28, *order denying request for clarification*, 183 FERC ¶ 61,185 (2023).

³⁷ 18 C.F.R. §§ 385.206(b)(1)-(2); see, e.g., *City of Oakland v. Pac. Gas & Elec. Co.*, 167 FERC ¶ 61,097, at P 6 (2019) (“To establish a *prima facie* case under the Commission’s regulations, a complainant must both identify the action or inaction alleged to violate the relevant statutory standard or regulatory requirement and explain how the action or inaction violates the standard or requirement.” (citing 18 C.F.R. §§ 385.206(b)(1)-(2))); *Black Oak Energy LLC v. N.Y. Indep. Sys. Operator, Inc.*, 122 FERC ¶ 61,261, at P 31 (2008) (“In a proceeding under FPA section 206, the burden of proof to show that any charge or practice is unjust or unreasonable is on the complainant.” (citing 16 U.S.C. § 824(e))); *330 Fund I, LP v. N.Y. Indep. Sys. Operator, Inc.*, 126 FERC ¶ 61,151, at P 12 (2009) (“[T]he complainant[] has the burden of proof to establish the facts needed to support the claims in its section 206 complaint.”).

³⁸ Complaint at 19-22.

Complainant did not resolve the deficiencies raised with the Deficiency Notice on June 2, 2026, all of which related to the dynamic model.³⁹ A complete dynamic model that reflects a proposed Generating Facility’s equipment configuration and electrical design specifications is critical to the interconnection study process. Without it, PJM cannot perform its stability studies, nor will PJM be able to integrate that Project Developer’s model into the collective Cycle 01 model, because the deficiencies in the individual project model will prevent the collective model from operating properly. Given the overarching fact that Complainant did not resolve the deficiencies raised on June 2, 2026, resulting in a deficient model, the Complaint should be denied.

A. PJM Followed the Application Review Procedures as Approved by the Commission and Did Not Violate Its Tariff.

Complainant asserts that PJM withdrew the Freshwater Dune Project for deficiencies raised only after the cure period, and in doing so, PJM violated its Tariff. As previously demonstrated, this is simply incorrect. To support its assertion, Complainant refers to a handful of comments in NextGen, that were date-stamped after the cure period, that were not previously raised in the Deficiency Comments.⁴⁰ Complainant argues that instead of PJM validating or rejecting its Application based on its Deficiency Responses, PJM issued a “second round” of deficiency comments in violation of the Tariff.⁴¹ Contrary to this assertion, PJM reviewed the Deficiency Responses and determined that the deficiency comments were not resolved, accordingly PJM rejected the Application. As noted above,

³⁹ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

⁴⁰ Complaint at 13-18 and 20.

⁴¹ Complaint at 3, 13-18 and 19-21.

the withdrawal was based on the Project Developer’s failure to correct identified deficiencies set forth in PJM’s Deficiency Notice.

Complainant points to certain “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.”⁴² This assertion is incorrect and contradicted by the date-stamped comments that were submitted in NextGen, all of which are dated *before* PJM issued its Deficiency Notice on June 2, 2026.⁴³ Accordingly, PJM raised the stability-related comments within the timeframe prescribed by the Tariff.⁴⁴

Complainant further argues that neither PJM nor NextGen flagged the stability-related comments, thus indicating that all deficiencies were resolved.⁴⁵ Prior to submitting its Deficiency Responses, Complainant states that NextGen would not accept its submission, but instead “returned an error stating that all deficiencies must be commented on or submitted before the submission could be completed.”⁴⁶ Unable to locate the outstanding data fields, Complainant reached out to PJM for assistance, where PJM “named only two Transformer Information fields—omitting the very stability comments it would later invoke as grounds to withdraw the Freshwater Dune Project.”⁴⁷

As a functionality of NextGen, once an Application is placed in “Data Deficient” status, NextGen identifies the deficient data fields along with the associated deficiency

⁴² Complaint at 20 (emphasis added).

⁴³ See Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

⁴⁴ Tariff, Part VIII, Subpart B, section 403(B)(1)(a).

⁴⁵ Complaint at 12-13.

⁴⁶ Complaint at 11.

⁴⁷ Complaint at 29-30.

comments. NextGen requires the Project Developer to comment on all deficient data fields, in order to submit its responses to its deficiencies. Thereafter PJM manually reviews the contents of the submissions, to determine whether the identified deficiency has been resolved in accordance with the applicable Tariff requirements.

As relevant here, the stability-related comments Complainant claims that PJM “never communicated,” were all contained within one data field in NextGen labeled, the “Dynamic File(s).”⁴⁸

Figure 2: NextGen Data-Field

The screenshot displays the 'NextGen Data-Field' interface. It features three distinct sections, each with a title, a status indicator (red asterisk), an information icon (blue 'i'), and a file upload area. The first section, 'Fuel Supply Verification', includes a blue speech bubble icon and a dropdown menu currently set to 'Storage'. The second section, 'Single line diagram', features a pink flag icon and a file named 'FreshwaterDune_SLD_2026-06-04.pdf'. The third section, 'Dynamic File(s)', also has a pink flag icon and shows a file named 'Prepared in accordance with the PJM Dynamic Model Development Guidelines. Dynamic Model.zip'.

In response to the Dynamic Files(s) data field, Complainant submitted its comment with an updated DMDG package in a zip folder. For that reason, NextGen did not flag the Dynamic File(s) data field as outstanding and only flagged the data fields that were left without comments (i.e. the High-side to tertiary and Low-side to tertiary).⁴⁹ While NextGen can identify whether a deficient data field has been commented on or not, it is not

⁴⁸ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

⁴⁹ Complaint at Attachment B.

designed to validate the contents of the Project Developer's submission. As mentioned, such validation process is manually conducted by a PJM engineer. PJM would not be able to identify the uncured deficiencies, without inspecting the uploaded DMDG package. Thus, the onus was on Complainant, to ensure that it has satisfactorily addressed all deficiency comments within the Dynamic File(s) data field, prior to submitting its comments in NextGen.

The Complainant argues that “by applying the DMDG as grounds 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[.]”⁵⁰ As previously explained, PJM rejected the Application after PJM reviewed Complainant's Deficiency Response and determined that the deficiencies remained unresolved. Further, rather than generally pointing to the DMDG, the deficiency comments explicitly call out each and every item that was required to resolve the issues raised (i.e. PSEE files, PQ curve, DLL, plant level controller model, and REEC modules),⁵¹ thus there was no “moving target” as Complainant suggests.⁵²

B. PJM Withdrew the Freshwater Dune Project Pursuant to the Application Requirements of the Tariff

Complainant argues that the “DMDG's requirements were the only stated reason for withdrawal” and therefore “must be specified in the Tariff before PJM can enforce them against an interconnection customer.”⁵³ As a threshold matter, this recitation of the facts

⁵⁰ Complaint at 21-22.

⁵¹ See Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

⁵² Complaint at 22.

⁵³ Complaint at 23, 25.

is unsupported. As previously explained, and as indicated in the Withdrawal Notice,⁵⁴ the Freshwater Dune Project was withdrawn for deficiencies that remained unaddressed or unresolved. Nonetheless, the DMDG requirements should not be filed in the Tariff, as the Application requirements are clear.

Decisions regarding whether an item should be placed in a tariff or in a business practice manual are guided by the Commission's rule of reason policy, under which "provisions that significantly affect rates, terms, and conditions of service, are readily susceptible of specification, and are not generally understood in a contractual agreement must be included in the tariff, while items better classified as implementation details may be included only in the business practice manual."⁵⁵ The Commission recognized that "it is no more possible to set forth *all* of the practices affecting rates ... than it is to set forth *all* of the terms and conditions of a contract, leaving nothing whatever to be implied."⁵⁶ The Commission has broad bounds of discretion in this regard, as the D.C. Circuit has affirmed, that tariffs do not need to include the *entire universe* of specifiable practices.⁵⁷ By way of example in *Energy Storage*, while finding that PJM's methodology for calculating benefits factor must be in PJM's Tariff, the Commission agreed with PJM in that it must retain operational flexibility and that implementation and operational details

⁵⁴ See Exhibit 5 – Withdrawal Notice.

⁵⁵ *Energy Storage Ass'n v. PJM Interconnection, L.L.C.*, 162 FERC ¶ 61,296, at P 103 (2018) ("*Energy Storage*") (quotation marks omitted) (citing *Cal. Indep. Sys. Operator Corp.*, 122 FERC ¶ 61,271, at P 16 (2008)).

⁵⁶ *Hecate Energy Green Cnty. 3 LLC v. FERC*, 72 F.4th 1312 (D.C. Cir. 2023) (citing to *City of Cleveland v. FERC*, 773 F.2d 1368, 1370 (D.C. Cir. 1985)).

⁵⁷ *Hecate Energy Green Cnty. 3 LLC v. FERC*, 72 F.4th at 1314 (citing *City of Cleveland v. FERC*, 773 F.2d at 1376) ("[E]ven specifiable practices that significantly affect rates need not be included if they are clearly implied by the tariff's express terms.").

were better suited in its manuals.⁵⁸ The Commission has upheld this same standard in accepting PJM's Interconnection Process Reform Tariff Revisions.⁵⁹

Complainant asserts that “[f]ailure to satisfy DMDG requirements was the express and stated basis for PJM’s withdrawal[,]” therefore the DMDG “significantly affect rates, terms, and conditions.”⁶⁰ Despite this untrue statement, the Commission has held that “even significant and specifiable practices need not be in a tariff when they are clearly implied by the tariff’s express terms.”⁶¹ Tariff, Part VIII, Subpart B, section 403(A) does more than imply, but explicitly requires Project Developers to submit a Completed Application that includes all information required under the Tariff, as detailed further in the Application and PJM’s Manuals.⁶² PJM Manual 14H then provides additional guidance on Application requirements, reiterating the importance of complying with the DMDG and specifically stating that failure to adhere to the requirements will result in withdrawal.⁶³ Thus, the significant practices being disputed are more than implied, as demonstrated by

⁵⁸ The Commission also noted that “complex algorithms and proprietary software code underlying its [regulation] signals are not appropriate for inclusion in its Tariff,” and thus did not require PJM to include such details in its Tariff. *Energy Storage* at P 108.

⁵⁹ The Commission found that PJM provided sufficient detail in its Tariff on its proposed site control requirements, and that further implementation details are appropriately addressed in PJM’s Manuals. *PJM Interconnection, L.L.C.*, 181 FERC ¶ 61,162, at P 102.

⁶⁰ Complaint at 25.

⁶¹ *Hecate Energy Green Cnty. 3 LLC v. FERC*, 72 F.4th at 1314 (citing *City of Cleveland v. FERC*, 773 F.2d at 1376) (“[E]ven specifiable practices that significantly affect rates need not be included if they are clearly implied by the tariff’s express terms.”).

⁶² Tariff, Part VIII, Subpart B, section 403(A)(1).

⁶³ PJM Manual 14H, section 2.1.2 (“Modeling Data required for Stability analysis must be provided with the submitted application in PJM data submission tool. Project Developers shall follow PJM Dynamic Model Development Guidelines on the PJM website to submit stability data specific to their project. Project Developers should pay special attention to PJM Dynamic Model Development Guidelines to ensure all deliverables are met. If stability data submission is not approved at the end of the deficiency review period, the application will be withdrawn.”).

the extraordinary number of Applications—715 in this Cycle—that advanced through the Application Review Phase.⁶⁴

Complainant argues that PJM’s DMDG “impose[s] a materially different and far more demanding set of obligations [than what] appears in Section 403(A)(1)[,]” and, therefore, should be filed with the Commission before relying on it as a basis for withdrawal.⁶⁵ This is also untrue. Neither PJM’s implementation of its Application Review Phase, nor any of the requirements in the DMDG, conflict with the Tariff. To support its assertion, however, the Complainant points to the D.C. Circuit’s decision in *KeySpan-Ravenswood*, in arguing that the “filed rate doctrine prohibits a public utility from enforcing a rate, term, or condition of service that it has not filed with the Commission.”⁶⁶ In *KeySpan- Ravenswood*, New York Independent System Operator, Inc., implemented a methodology for translating installed capacity into unforced capacity, in a manner that directly conflicted with its filed commitment to enforce New York State Reliability

⁶⁴ See *Over 700 New Generation Projects Accepted Into First Cycle of Reformed Interconnection Process More Than 200 GW in Planned Resources Move Forward To Address Growing Electricity Demand*, PJM Interconnection, L.L.C. (Aug. 3, 2026), <https://www.pjm.com/-/media/DotCom/about-pjm/newsroom/2026-releases/20260803-over-700-new-generation-projects-accepted-into-first-cycle-of-reformedinterconnection-process.pdf> [<https://perma.cc/9K3B-YCL6>]. Moreover, PJM provides extensive guidelines and training materials, to help ensure that their Applicants are submitting meaningful Applications. To that end, PJM provided extensive stakeholder guidance as to the DMDG requirements in the months leading up to the Cycle 01 Application Deadline. In addition to written materials, educational training included video engagement. See *PJM Dynamic Model Development Guidelines for Stability Studies*, PJM Interconnection, L.L.C. (Mar. 26, 2024), https://videos.pjm.com/media/Interconnection%20Process%3A%20Stability%20Modeling%20Guidelines/1_jeb0xq8v [<https://perma.cc/Z86C-ALKK>]; Shekhar Raj Awasthi, Sr. Engineer, Interconnection Planning Analysis, *Dynamic Model Application Requirements*, PJM Interconnection, L.L.C., 7 (Feb. 23, 2026), <https://www.pjm.com/-/media/DotCom/committees-groups/subcommittees/ips/2026/20260223/20260223-item-05---dynamicmodel-application-requirements.pdf> [<https://perma.cc/7L9Q-2S7Q>]; Stacey Nestel, Lead Engineer, Interconnection Planning Projects, *Cycle 01 Application Reminders* (Mar. 30, 2026), <https://www.pjm.com/-/media/DotCom/committees-groups/subcommittees/ips/2026/20260330/20260330-item-04---cycle-01-application-reminders.pdf> [<https://perma.cc/48ED-P7D4>].

⁶⁵ Complaint at 25.

⁶⁶ Complaint at 22-23 (citing to *KeySpan-Ravenswood, LLC v. FERC*, 474 F.3d 804, 810-811 (D.C. Cir. 2007); see *Pub. Serv. Comm’n of N.Y. v. FERC*, 813 F.2d 448, 454 (D.C. Cir. 1987)).

Council’s installed capacity requirements.⁶⁷ Thus, the court held that any “public utility regulated under FPA, [] may only change its rate or ‘practices ... affecting such rates’ by first filing those rates with the Commission.”⁶⁸ By contrast here, PJM did not change any of the Application requirements from what is stated in the Tariff. Nor has Complainant identified any DMDG requirements that contradict the Tariff.

As the DMDG describes, the DMDG is “meant to serve as a guideline in the development of the dynamics model for [a] project. It is aimed at facilitating an efficient and timely model submission and acceptance process.”⁶⁹ To that end, the DMDG includes a checklist, which is designed to “help promote good practice of model development by the Project Developers, facilitate consistent model reviews by the Transmission Planners and ensure the dynamic models meet applicable interconnection requirements.”⁷⁰ As noted in the DMDG,

“[a]s the technology evolves, so will the modeling techniques. This document may not cover every specific scenario. Any unique scenarios or settings that may be required for your project model shall be noted in the Dynamic Model Report and brought to the attention of PJM in the Data Application form.”⁷¹

For these reasons, the DMDG should not be filed in the Tariff, since PJM must retain operational flexibility, to keep up with ever changing technological advancements.⁷²

⁶⁷ *KeySpan-Ravenswood*, 474 F.3d at 810.

⁶⁸ *KeySpan-Ravenswood*, 474 F.3d at 810.

⁶⁹ DMDG at section 2.

⁷⁰ DMDG at section 2.; *see* Exhibit 4 – DMDG Checklist.

⁷¹ DMDG at section 2.

⁷² *See supra* note 58.

Complainant misinterprets the rule of reason policy in stating that, “the filing obligation reaches practices that matter to the service a customer receives, and excuses only those of ‘practical insignificance’ to serving customers.”⁷³ To support its assertion, the Complainant cites to the D.C. Circuit’s Order in *Public Service Commission of New York v. FERC* holding that “the Commission properly excused utilities from filing policies or practices that dealt with only matters of ‘practical insignificance’ to serving customers[.]”⁷⁴ In *Public Serv. Comm’n of N.Y.*, the Petitioner argued that the Commission improperly rejected its proposal that the Tennessee Gas Pipeline Co. (“Tennessee”) should be required to state its priority policy in its tariff.⁷⁵ The court determined that “[g]iven the practical insignificance of Tennessee’s priority policy, the Commission acted within its discretion in not requiring Tennessee to state that policy in its tariff.”⁷⁶ Thus although matters of practical insignificance are not subject to the filing requirement, the Complainant stretches this conclusion to state that only matters of practical insignificance may be excused from the filing obligation.

C. PJM Applied Its Application Review Procedures in a Just and Reasonable Manner, in Compliance With Its Tariff

Complainant presents three arguments for why PJM’s process for evaluating Applications is purportedly unjust, unreasonable, and unduly discriminatory. First, neither PJM nor NextGen flagged the stability-related comments as outstanding, when NextGen

⁷³ Complaint at 23.

⁷⁴ *Pub. Serv. Comm’n of N.Y. v. FERC*, 813 F.2d 448, 454 (D.C. Cir. 1987) (“*Public Serv. Comm’n of N.Y.*”).

⁷⁵ See generally, *id.*

⁷⁶ *Id.*

“detected an identified deficiency that lacked a response.”⁷⁷ As previously explained,⁷⁸ NextGen identifies whether or not a deficient data field includes a comment; however, it is not designed to validate the contents of the Project Developer’s submission. Further, PJM would not be able to identify the uncured deficiencies, without physically inspecting the uploaded DMDG package. In arguing that PJM should have identified the missing stability data in its DMDG package, Complainant suggests that PJM should have initiated its review of the Deficiency Response, prior to the close of the cure period, which would have PJM disregard the plain language of the Tariff.⁷⁹

Second, Complainant contends that PJM fragmented its deficiency comments across the NextGen portal and in email and then “treated items it never brought to Advantage Renewables’ attention as grounds for withdrawal.”⁸⁰ As previously explained, the Deficiency Notice states that “[t]he deficiency comments provided below are not intended to be exhaustive and reflect only the most recent comment for each field.”⁸¹ Additionally the Complainant is responsible for reviewing each deficient field in NextGen and addressing all associated comments to ensure a complete and satisfactory cure.⁸² All of the stability-related deficiency comments that Complainant argues were never brought

⁷⁷ Complaint at 30.

⁷⁸ Pages 11-12 of this Answer.

⁷⁹ Tariff, Part VIII, Subpart B, section 403(B)(1)(c). Following the 10 Business Day cure period, 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.”

⁸⁰ Complaint at 17, 30.

⁸¹ Exhibit 1 – Deficiency Notice.

⁸² *Id.*

to its attention, were listed together in one data field and made available to Complainant at the beginning of the cure period.⁸³

Lastly, Complainant argues that PJM withdrew “the Freshwater Dune Project based on requirements that were not communicated to Advantage Renewables during the applicable cure period.”⁸⁴ As demonstrated in the Exhibit No. 3, there were a total of eight deficiency comments raised on June 2, 2026, that were left unresolved following the cure period. Accordingly, PJM withdrew the Freshwater Dune Project.

Complainant asserts that PJM’s conduct was unduly discriminatory in implementing its Application Review Phase. Specifically, that “[u]pon 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.”⁸⁵ Without supporting details or evidence, PJM cannot meaningfully address this assertion, nor does Complainant satisfy its burden of proof under Rule 206(b). Nevertheless, PJM applied the same Application Review process for the hundreds of Cycle 01 Applications for projects that advanced beyond the Application Review Phase, in accordance with the Tariff. Further, each Project is evaluated and assessed based on its individual equipment selection, equipment capabilities, and electrical configuration; as such, each Project must be carefully reviewed against PJM, NERC, and Transmission Owner reliability standards and criteria.

⁸³ See Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

⁸⁴ Complaint at 30.

⁸⁵ Complaint at 31.

D. The Relief Requested Is Not Just and Reasonable and Therefore Should Be Denied. Further, Reinstatement of the Freshwater Dune Project Will Substantially Delay Cycle 01 and May Adversely Affect Future Cycles.

The relief Complainant is seeking is unjust and unreasonable, and therefore should be denied. The Complainant requests that “Commission direct PJM to reinstate the Freshwater Dune Project into Cycle 01 with its original queue position preserved.”⁸⁶ In doing so, Complainant states that it is not seeking “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.”⁸⁷ Contrary to this assertion, reinstating Complainant’s Application would deviate from the Application Review process, that PJM consistently applied for all other applications in Cycle 01. Nor is it clear whether Complainant is seeking another deficiency review or suggesting that the Application be approved without a complete model, which PJM would need in order to develop the Cycle 01 stability model. Neither option is just or reasonable, and would afford Complainant preferential treatment.

Reinstatement of the Freshwater Dune Project would also inevitably delay PJM’s processing of Cycle 01. PJM posted its Phase I Base Case Data on August 28, 2026,⁸⁸ with Phase I set to begin on September 28, 2026. Reinstatement of the Freshwater Dune Project would require PJM to provide Complainant with a stand-alone deficiency review process. In order for the Freshwater Dune Project to proceed as part of Cycle 01, PJM must be able to validate its dynamic model, then rebuild and test its Base Case models with the

⁸⁶ Complaint at 31.

⁸⁷ *Id.*

⁸⁸ See *Cycle Timeline*, PJM Interconnection, L.L.C., <https://www.pjm.com/planning> [<https://perma.cc/ELR3-HWF3>] (Scroll to Cycle Timeline chart at bottom of website page, select Cycle 1 in the “Select Cycle” window) (last visited Sep. 8, 2026) (providing Cycle 01 Phase I Base Case posting date).

Freshwater Dune Project included, and repost its Phase I Base Case data. Only then would PJM be in a position to move to Phase I.⁸⁹ If the Complaint were granted, under no circumstances would PJM be in a position to proceed with Phase I on September 28, 2026. The resulting delay to Phase I would delay all subsequent Cycle 01 deadlines and could result in delays to projected deadlines for any future cycles. Such delays are precisely the kinds of inefficiencies that the deficiency review process was designed to avoid.

Other Cycle 01 Project Developers may also be adversely impacted by including the Freshwater Dune Project in the Phase I Base Case model. The 30-day period to review Base Case model is currently running. Cycle 01 Project Developers are currently reviewing it and may withdraw based on that evaluation. If PJM must rebuild and repost its model to include the Freshwater Dune Project, certain Project Developers that withdrew may conclude that they would not have done so based on the revised model data. PJM would then need to reinstate those New Service Requests, as the conditions under which they withdrew would now be invalid. Such an outcome would only compound delays to Phase I.

If the Commission grants the relief requested in the Complaint, PJM requests action no later than September 14, 2026, two weeks before the date on which PJM plans to commence Phase I of Cycle 01. While this date is aggressive, it would limit as much as possible the approximately two-month set back to Cycle 01. In the event the Complaint is granted, the Commission should grant any and all waivers of the Tariff necessary to prevent undue harm to PJM and other Project Developers in Cycle 01 as a result of the Freshwater

⁸⁹ In accordance with the Tariff, “Phase I shall start on the first Business Day immediately following the end of the Application Review phase, but no earlier than 30 days following the distribution of the Phase I Base Case Data.” Tariff, Part VIII, Subpart C, section 405(A)(1)(b)(i).

Dune Project's reinstatement. The delays resulting from reinstatement will not only affect the calculation of all Cycle 01 Phase and Decision Points, but will also affect processing time for return of study deposits and other financial obligations of the Project Developers.

III. ADMISSIONS AND DENIALS PURSUANT TO 18 C.F.R. § 385.213(C)(2)(I)

Pursuant to Rule 213(c)(2)(i) of the Commission's Rules of Practice and Procedure,⁹⁰ PJM admits or denies the alleged material facts stated in the Complaint as follows: to the extent that any allegation set forth in the Complaint is not specifically admitted in this answer, it is denied.

IV. AFFIRMATIVE DEFENSES PURSUANT TO 18 C.F.R. § 385.213(C)(2)(II)

PJM's affirmative defenses are set forth above in this answer, and include the following, subject to amendment and supplementation.

1. The Complaint fails to satisfy the burden of proof under section 206 of the FPA, 16 U.S.C. § 824e, and has not demonstrated that PJM violated any Commission order, Tariff, or any other Commission-jurisdictional governing document, or that PJM administered its Tariff in an unjust, unreasonable, or unduly discriminatory manner in reviewing the Freshwater Dune Project's New Service Request.

⁹⁰ 18 C.F.R. § 385.213(c)(2)(i).

V. CONCLUSION

For the reasons set forth in this answer, the Commission should deny the Complaint.

Respectfully submitted,

/s/ Salvia Yi

Salvia Yi
Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard,
Audubon, PA 19403
484-501-4619
Salvia.Yi@pjm.com

Christopher B. Holt
Managing Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard,
Audubon, PA 19403
610-666-2368
Christopher.Holt@pjm.com

Craig Glazer
Vice President – Federal Government Policy
PJM Interconnection, L.L.C.
1200 G Street, NW, Suite 600
Washington, DC 20005
202-423-4743 (phone)
202-393-7741 (fax)
Craig.Glazer@pjm.com

***Counsel for
PJM Interconnection, L.L.C.***

September 8, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Audubon, Pennsylvania this 8th day of September 2026.

/s/ *Salvia Yi*

Salvia Yi

Counsel

PJM Interconnection, L.L.C.

2750 Monroe Boulevard,

Audubon, PA 19403

484-501-4619

Salvia.Yi@pjm.com

Exhibit 1

Deficiency Notice

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.

Exhibit 2

Screenshots of Deficiency Comments in NextGen

Deficiency Tracking



	Date	Value	Comment	Entered By	Role
	05/08/2026	PSSE Model.zip	[EPE - Gavgani] - Stability - PQ curve is missing in the dynamic package. Please provide all the relevant files outlined in DMDG document in dynamic package .zip file.	Mirjavad Hashemi Gavgani	IA Engineer
	05/07/2026	PSSE Model.zip	1- [EPE - Mostajeran] - Stability - Please provide a complete package in line with PJM DMDG requirements- which includes, but is not limited to, Dynamic Model Report, Dynamic Model Checklist etc. For detailed list of deliverables, please refer to PJM DMDG. 2- [EPE - Mostajeran] - Stability - Please ensure to provide all the PSSE files including .sav, .raw, .cnv, .snp, and .sld. 3- [EPE - Mostajeran] - Stability - The submitted raw file cannot be opened in PSSE. Please verify and update.	Erfan Mostajeran	IA Engineer
	04/27/2026	PSSE Model.zip	Initial value	Farah Neha	NextGen Read/Write
Records Per Page: << < (1 of 1) > >>					

Close

Deficiency Tracking



	Date	Value	Comment	Entered By	Role
🚩	05/08/2026	PSSE Model.zip	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))	Mirjavad Hashemi Gavgani	IA Engineer
🚩	05/08/2026	PSSE Model.zip	[EPE - Gavgani] - Stability - Missing Models: Missing 1 plant level controller models. Found no 'REPC' models but need 1 to match 'REGC' model. No PLNTB model found as alternative. Please verify and update.	Mirjavad Hashemi Gavgani	IA Engineer
🚩	05/08/2026	PSSE Model.zip	[EPE - Gavgani] - Stability - 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.	Mirjavad Hashemi Gavgani	IA Engineer
Records Per Page: << < (1 of 1) > >>					

Close

Dynamic File(s)

	Date	Value	Comment	Entered By	Role
🚩	06/16/2026	Dynamic Model.zip	Dynamic model updated.	Farah Neha	NextGen Read/Write
🚩	06/16/2026	Dynamic Model.zip	Value changed	Farah Neha	NextGen Read/Write
🚩	05/08/2026	PSSE Model.zip	[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)	Mirjavad Hashemi Gavgani	IA Engineer
🚩	05/08/2026	PSSE Model.zip	[EPE - Gavgani] - Stability - REGCA: Lvpnt0 value is recommended to be 0 to eliminate unnecessary active-power curtailment. Please provide a brief description on the justification for this selection. Check Lvpnt0 in REGCA module CONs(J+7)	Mirjavad Hashemi Gavgani	IA Engineer
🚩	05/08/2026	PSSE Model.zip	[EPE - Gavgani] - Stability - 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	Mirjavad Hashemi Gavgani	IA Engineer

Records Per Page: << < (1 of 1) > >>

Close

Exhibit 3

Table Summary of Inadequate Deficiency Responses

Deficiency Comment in NextGen, posted for Project Developer review on June 2, 2026	Deficiency Response submitted on June 16, 2026	PJM Review and Basis for Withdrawal
“[EPE - Mostajeran] - Stability - Please provide a complete package in line with PJM DMDG requirements- which includes, but is not limited to, Dynamic Model Report, Dynamic Model Checklist etc. For detailed list of deliverables, please refer to PJM DMDG.”¹	The Deficiency Response only included two of the required deliverables,² the .dyr and .raw files, in its DMDG package.	Without all of the required deliverables, PJM could not validate the Deficiency Response.³ In addition to the .dyr and .raw files, a complete DMDG package for battery storage facilities must include the following deliverables: 1. A Dynamic Model Report, summarizing model development and testing per the DMDG, with a comparison table showing Data Application form values and PSS/E model values of all parameters.⁴ 2. For PSS/E library models, the .idv and .dyr files developed consistent with the DMDG.⁵ 3. For User-Defined Models (“UDM”), a properly compiled PSS/E version .sav case along with .idv, .dyr, and .dll files appropriately parameterized for the project consistent with the DMDG.⁶

¹ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

² DMDG, section 8.1.

³ Exhibit 5 – Withdrawal Notice.

⁴ DMDG, section 8.1, item 2.

⁵ DMDG, section 8.1, item 3.

⁶ DMDG, section 8.1, item 4.

		4. For UDM, a block diagram for the model and sub modules, along with values, names and detailed explanation of all model parameters.⁷ 5. The case set up folder/files, including the .raw, .sav case, .cnv, .snp and .sld files for the project.⁸ 6. Verification that all testing requirements are met, including: (a) a Maximum Facility Output assessment table;⁹ (b) power factor assessment table along with the P-Q curve, and case setup for power factor assessment;¹⁰ (c) confirmation that the project satisfies FERC Order No. 827, regarding automatic voltage regulation with appropriate model settings;¹¹ (d) results for the flat start test including log, out and test plots showing Power, VARs, Eterm, Freq and Volt for each
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⁷ DMDG, section 8.1, item 4.b.

⁸ DMDG, section 8.1, item 5.

⁹ DMDG, section 8.1, item 6.a.

¹⁰ DMDG, section 8.1, item 6.b.

¹¹ DMDG, section 8.1, item 6.c.

		inverter/generator;¹² (e) results for the VRT test including log, out and test plots showing Power, VARs, Eterm, Iterm, Freq and Volt for each inverter, along with confirmation that Momentary Cessation is eliminated (if not, a reason why);¹³ and (f) confirmation that primary frequency response is enabled.¹⁴
“[EPE - Mostajeran] - Stability - Please ensure to provide all the PSSE files including .sav, .raw, .cnv, .snp, and .sld.” ¹⁵	The Deficiency Response did not include the PSSE files, including .sav case, .cnv, and .sld files.	Without the requested PSSE files, including, .sav case, .cnv, and .sld files, PJM could not validate the Deficiency Response. ¹⁶
“[EPE - Mostajeran] - Stability - The submitted raw file cannot be opened in PSSE. Please verify and update.” ¹⁷	The Deficiency Response did not submit the .raw file in a compatible format usable with applicable PSSE version.	Without the requested .raw file in a compatible format, PJM could not validate the Deficiency Response. ¹⁸
“[EPE - Gavani] - Stability - PQ curve is missing in the dynamic package. Please provide all the relevant files outlined in	The Deficiency Response did not include the PQ curve, which illustrates the active and reactive power capability	Without the requested PQ curve, PJM could not validate the Deficiency Response. ²⁰

¹² DMDG, section 8.1, item 6.d.

¹³ DMDG, section 8.1, item 6.e.

¹⁴ DMDG, section 8.1, item 6.f.

¹⁵ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

¹⁶ Exhibit 5 – Withdrawal Notice.

¹⁷ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

¹⁸ Exhibit 5 – Withdrawal Notice.

²⁰ Exhibit 5 – Withdrawal Notice.

DMDG document in dynamic package .zip file.” ¹⁹	of the inverter.	
“[EPE - Gavgani] - Stability - 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.” ²¹	The Deficiency Response did not include the necessary Dynamic Link Library (“DLL”) file(s) to establish that the models were user-defined models. If PSSE generic models were to be used, the DLL file(s) would not be required.	Without the requested DLL file(s), PJM could not validate the Deficiency Response. ²²
“[EPE - Gavgani] - Stability - Missing Models: Missing 1 plant level controller models. Found no 'REPC' models but need 1 to match 'REGC' model. No PLNTB model found as alternative. Please verify and update.” ²³	The Deficiency Response did not include the plant level controller model.	Without the requested plant level controller model, PJM could not validate the Deficiency Response. ²⁴
“[EPE - Gavgani] - Stability - 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	The Deficiency Response did not include any justification on why the real power V-I pair, voltage (Vp1) was not zero, when the corresponding real power V-I pair, current (Ip1) is less than 1.	Without the requested justification on why the Vp1 was not zero, despite the corresponding Ip1 being less than 1, PJM could not validate the Deficiency Response. ²⁶

¹⁹ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

²¹ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

²² Exhibit 5 – Withdrawal Notice.

²³ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

²⁴ Exhibit 5 – Withdrawal Notice.

²⁶ Exhibit 5 – Withdrawal Notice.

CONs(J+40))” ²⁵		
“[EPE - Gavgani] - Stability - REGCA: Lvpnt0 value is recommended to be 0 to eliminate unnecessary active-power curtailment. Please provide a brief description on the justification for this selection. Check Lvpnt0 in REGCA module CONs(J+7))”²⁷	The low voltage point value for active current management remained unchanged at 0.03, despite PJM recommending that it be changed to 0.	Without the low voltage point value for active current management being changed to 0 as recommended, PJM could not validate the Deficiency Response.²⁸

²⁵ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

²⁷ Exhibit 2 – Screenshots of Deficiency Comments in NextGen.

²⁸ Exhibit 5 – Withdrawal Notice.

Exhibit 4

DMDG Checklist

8.1 Dynamic Model Checklist

This checklist must be completed by the Project Developer and included with the project submission in the Data Submission Platform to demonstrate that the Deliverables in **Section 8** have been met.

	Description	Comment	Check
1	Completed Data Application form along with all requested files submitted via the applicable Data Submission Platform portal		
2	Dynamic Model Report, summarizing model development and testing per guidelines in this document. A comparison table showing Data Application form values and PSS/E model values of all parameters is required.		
3	If a PSS/E library model is submitted (preferred), .idv and .dyr files developed using the guidelines in this document are included.		
4	If a User-Defined Model (UDM) is submitted, a properly compiled PSS/E version .sav case along with .idv, .dyr, and .dll files appropriately parameterized for the project using the guidelines in this document is included.		
4a	For UDM: A report on how the settings of the model were parameterized along with the manufacturer's documentation, including a user guide of the UDM		
4b	For UDM: Block diagram for the model and sub modules, along with values, names and detailed explanation of all model parameters		
5	.raw, .sav case, .cnv, .snp and .sld file for the project (case setup folder/files) are submitted.		
6	Verify all testing requirements are met:		
6a	MFO assessment table is included in the Dynamic Model Report		
6b	Power factor assessment table along with P-Q curve used and case setup for power factor assessment (lagging and leading scenarios) is included in the Dynamic Model Report.		
6c	Confirm that the unit meets FERC Order No. 827 with regard to automatic voltage regulation with appropriate model settings included in the Dynamic Model Report.		
6d	Results for the flat start test including log, out and test plots showing Power, VARs, Eterm, Freq and Volt for each inverter/generator is included.		
6e	Results for the VRT test including log, out and test plots showing Power, VARs, Eterm, Iterm, Freq and Volt for each inverter. Provide confirmation that Momentary Cessation is eliminated (if not, provide reason).		
6f	Confirm primary frequency response is enabled.		
7	For As Built submissions only: Factory Acceptance Test (FAT) Report for each transformer installed.		

Exhibit 5

Withdrawal Notice

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.