

September 10, 2026

Ms. Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *PJM Interconnection, L.L.C.*, Docket No. ER26-751-000
Notice of Filing of Motion for Extension Relating to Order Nos. 1920, 1920-A,
and 1920-B Compliance with Cost Allocation Requirements

Dear Secretary Reese:

On August 4, 2026, the PJM Area Relevant State Entities Committee (“PARSEC”),¹ PJM Transmission Owners, and PJM Interconnection, L.L.C. (“PJM”) (collectively, “Joint Movants”) filed a joint motion² in the Order No. 1920³ proceeding requesting a 30-day extension, until September 10, 2026, of the following: (1) the Engagement Period; (2) the deadline for PJM Transmission Owners to file their portion of the Order No. 1920 regional compliance filing, specifically one or more *ex ante* Long-Term Regional Transmission Cost Allocation Methods to allocate the costs of selected Long-Term Regional Transmission Facilities;⁴ and (3) the deadline for PJM to submit revisions to its proposed Long-Term Regional Transmission Planning Protocol (“LTRTP Protocol”) to implement the *ex ante* Long-Term Regional Transmission Cost Allocation Method(s) filed by PJM Transmission Owners.⁵

¹ PARSEC is a group of Relevant State Entities responsible for electric utility regulation or siting electric transmission facilities within the PJM Region as defined in Order Nos. 1920 and 1920-A.

² *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Unopposed Joint Motion for Extension of Time, Request for Expedited Consideration, and Waiver of Comment Period of PJM Area Relevant State Entities Committee, PJM Transmission Owners and PJM Interconnection, L.L.C., Docket No. RM21-17-000 (Aug. 4, 2026).

³ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Order No. 1920, 187 FERC ¶ 61,068, *order on reh’g & clarification*, Order No. 1920-A, 189 FERC ¶ 61,126 (2024), *order on reh’g & clarification*, Order No. 1920-B, 191 FERC ¶ 61,026 (2025), *appeals pending sub nom.*, *Appalachian Voices v. FERC*, Nos. 24-1650, et al. (4th Cir. July 16, 2024).

⁴ The Commission previously granted extensions of the Engagement Period and the deadline for PJM Transmission Owners to file their portion of the Order No. 1920 regional compliance filing on February 6, 2025, October 17, 2025, and June 11, 2026.

⁵ The Commission previously granted an extension of the deadline for PJM to submit the remaining LTRTP Protocol revisions that depend on PJM Transmission Owners’ Order No. 1920 cost allocation compliance filing on June 11, 2026.

On August 11, 2024, the Office of the Secretary granted this joint motion, recognizing that PJM's obligation to submit its remaining LTRTP Protocol revisions "depend[s] on PJM Transmission Owners' Order No. 1920 cost allocation compliance filing"⁶

On September 8, 2026, Joint Movants filed another joint motion, requesting a 15-day extension to allow for the continued discussions between PARSEC and the PJM Transmission Owners, with the assistance of the Commission's Dispute Resolution Services, regarding a potential common cost allocation methodology. The Joint Movants stated that they expect those discussions to conclude by September 25, 2026, and committed to file motions to govern by that date proposing a schedule for the remaining compliance filings.⁷ As recognized by the Office of the Secretary and as reiterated in the September Motion, PJM's remaining compliance obligation with respect to the cost allocation requirements of Order No. 1920 is entirely dependent upon the outcome of the ongoing negotiations between PJM Transmission Owners and PARSEC.⁸ PJM therefore cannot submit the required revisions to the LTRTP Protocol until the outcome of those discussions is known.

Because the September Motion remains pending, PJM hereby notifies the Commission that it cannot meet the September 10, 2026, deadline established in the August Notice. PJM will work expeditiously to finalize and submit the required revisions in accordance with the schedule to be proposed following the conclusion of the ongoing discussions.

⁶ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Notice of Extension of Time, Docket No. RM21-17-000, at 2 (Aug. 11, 2026) ("Upon consideration, Joint Movants' request for an extension of time of the deadline for PJM to submit the remaining LTRTP Protocol revisions that depend on PJM Transmission Owners' Order No. 1920 cost allocation compliance filing is hereby granted, to and including September 10, 2026.") ("August Notice").

⁷ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation*, Unopposed Joint Motion for Extension of Time to File Motions to Govern, Request for Expedited Consideration, and Waiver of Comment Period of PJM Area Relevant State Entities Committee, PJM Transmission Owners and PJM Interconnection, L.L.C., Docket No. RM21-17-000 (Sep. 8, 2026) ("September Motion").

⁸ See September Motion at 3 ("Although not party to the DRS negotiations, PJM seeks an extension solely because its remaining compliance obligations are dependent upon the outcome of the PJM Transmission Owners' and PARSEC's ongoing discussions regarding the *ex ante* Long-Term Regional Transmission Cost Allocation Method. Because PJM's corresponding Operating Agreement revisions cannot be finalized until that proposal is complete, PJM requires the additional requested extension to prepare and submit a coordinated compliance filing.").

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Respectfully submitted,

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CERTIFICATE OF SERVICE

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

Dated at Washington, D.C., this 10th day of September 2026.

/s/ Anne Marie Hirschberger

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