UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Lanyard Power Holdings, LLC,	)	
Complainant,	)	
	)	
v.	)	**Docket No. EL26-107-000**
	)	
PJM Interconnection, L.L.C.	)	
Respondent.	)	

EMERGENCY MOTION OF PJM INTERCONNECTION, L.L.C.
OPPOSING SHORTENED COMMENT PERIOD

Pursuant to Rule 212 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure,[1] PJM Interconnection, L.L.C. ("PJM") hereby files this emergency motion ("Motion") requesting that the Commission decline to grant the shortened comment period requested in the captioned proceeding[2] and permit PJM the full 20-day comment period required in the Commission's regulations to respond to the Complaint.[3] PJM has been working diligently to review the Complaint and draft its answer to the Complaint as well as answers to complaints recently filed that were granted extremely short comment periods. However, these truncated deadlines are preventing PJM from responding in a meaningful way given the time needed to address the highly technical issues raised in the Complaint and the distraction these complaints represent for PJM personnel that are responsible for administering the PJM interconnection process. PJM

[1] 18 C.F.R. § 385.212.

[2] *Lanyard Power Holdings, LLC. v. PJM Interconnection, L.L.C.*, Complaint Requesting Fast Track Processing of Lanyard Power Holdings, LLC., Docket No. EL26-107-000 (Sep. 9, 2026) ("Complaint").

[3] *See* 18 C.F.R. 385.206(f).

therefore respectfully requests that the Commission decline to grant the shortened comment period requested in the Complaint and instead, establish the standard complaint answer period of 20 days.

I. BACKGROUND

Over the past several months, PJM has been working to process the 811 New Service Requests[4] in its Cycle 01 interconnection queue. Beginning with Cycle 01, Project Developers seeking to interconnect to the PJM Transmission System are subject to the requirements of Tariff, Part VIII.[5] To be considered in a Cycle, all Project Developers must submit a Completed Application that includes all information required under the Tariff prior to the Cycle's Application Deadline, as detailed further in Tariff, Part VIII, Subpart B, section 403, the *pro forma* Application and Study Agreement, and the PJM Manuals.[6] PJM reviews, and validates or rejects, each New Service Request during the Application Phase, prior to proceeding to Phase I of the corresponding Cycle.[7] If an Application does not satisfy the requirements for a Completed Application, it will not proceed beyond the Application Phase of a Cycle.[8]

During the Application Review Phase, PJM evaluates all Applications from Project Developers to determine whether deficiencies are present, including deficiencies with the

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[4] Capitalized terms not defined herein shall have the meaning set forth in the PJM Open Access Transmission Tariff ("Tariff").

[5] Tariff, Part VIII, Subpart B, section 403(A).

[6] *Id.*; Tariff, Part IX, Subpart A; Interconnection Projects Department, *PJM Manual 14H*: *New Service Requests Cycle Process*, PJM Interconnection, L.L.C. (Aug. 19, 2026), https://www.pjm.com/-/media/DotCom/documents/manuals/m14h.pdf [https://perma.cc/P92Y-JGP8].

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

[8] *Id.* (PJM "will review and validate New Service Requests . . . . Only valid New Service Requests will proceed past the Application Phase.").

projects' dynamic models. The deficiency review process spelled out in Tariff, 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.[9]

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,[10] nor from Transition Cycle Nos. 1 and 2.[11] 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.[12] The deficiency review process is also repeated in future Phases of a Cycle, using the same

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[9] Tariff, Part VIII, Subpart B, sections 403(B)(1)(a)-(c).

[10] *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, Docket No. ER22-2110-000, Appendix 2 (PJM Interconnection Process Filings) 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).

[11] Tariff, Part VII, Subpart C, section 306(B).

[12] IPRTF Filing at 1, 47.

timeline, to prevent non-viable projects from tying up valuable headroom on the Transmission System that potentially could have been used for other, viable projects.[13]

To facilitate Project Developers' progress through the interconnection process and increase the number of "ready" projects, PJM provided extensive education for developers and stakeholders on its interconnection process, the required elements of applications, and the Dynamic Modeling Development Guidelines[14] requirements specifically, in the months leading up to the Cycle 01 Application Deadline.[15] Project Developers were on notice regarding the dynamic modeling requirements and had ample time to prepare a working dynamic model for their applications. Nevertheless, not every New Service Request included a Completed Application and not every Project Developer that received a deficiency notice successfully cured the identified deficiencies.

Consistent with its Commission-approved deficiency review process, PJM issued deficiency notices to projects in May 2026 and received responses in June 2026. PJM then issued withdrawal notices to projects on August 3, 2026.

Approximately three weeks after PJM issued withdrawal notices to Cycle 01 projects, Project Developers began filing complaints at the Commission, arguing, among other things, that PJM's decisions to withdraw their projects from Cycle 01 were unjust

[13] *See id.* 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).

[14] Interconnection Analysis and Interconnection Planning Analysis Departments, *PJM Dynamic Model Development Guidelines for Interconnection Analysis*, PJM Interconnection, L.L.C. (Mar. 10, 2026), https://www.pjm.com/-/media/DotCom/planning/services-requests/pjm-dynamic-modeldevelopment-guidelines.ashx [https://perma.cc/96Z3-EGPN].

[15] 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].

and unreasonable. The first of these complaints were filed by Advantage Capital Renewables, LLC ("Advantage") in Docket No. EL26-99-000[16] and by Oklo Inc. ("Oklo") in Docket No. ER26-101-000.[17] For each of their complaints, Advantage and Oklo requested, and the Commission's Office of the Secretary established, exceptionally short comment periods of 14 days and seven days, respectively, rather than the standard 20-day comment period.[18] Since then, four more complaints have been filed, each with extensive records and requests for shortened comment periods;[19] one of these additional complaints is the Complaint at issue in this proceeding and discussed below.

II. OPPOSITION TO REQUEST TO SHORTEN COMMENT PERIOD

A. The Commission Should Decline to Shorten the Comment Period to Respond to the Complaint in Order to Permit Sufficient Time for PJM to Meaningfully Respond.

The Complaint seeks a shortened comment period of seven days.[20] The Complaint further argues that PJM is aware of the issues raised with the project at issue, claiming that this awareness, and the multitude of other complaints, indicates that PJM will have no

[16] *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).

[17] *Oklo Inc. v. PJM Interconnection, L.L.C.*, Emergency Complaint of Oklo Inc. Requesting Fast Track Processing and Motion for Shortened Answer Period, Docket No. EL26-101-000 (Aug. 28, 2026).

[18] *See Duke Energy Indiana, LLC*, Combined Notice of Filings #1, Docket Nos. AC26-98-000, et al. (Aug. 28, 2026); *Advantage Capital Renewables, LLC v. PJM Interconnection, L.L.C.*, Errata Notice Shortening Comment Period, Docket No. EL26-99-000 (Aug. 31, 2026). The seven-day answer period for the Oklo Complaint was all the more extreme considering that the Oklo Complaint contained non-public information, which normally would mean an additional 10 days for the answer period, for a total of 30 days to answer. *See* 18 C.F.R. 385.206(f).

[19] *See Current Hydro LLC v. PJM Interconnection, L.L.C.*, Complaint and Request for Fast Track Processing of Current Hydro LLC, Docket No. EL26-102-000 (Sep. 1, 2026); *Agilitas Energy, Inc. v. PJM Interconnection, L.L.C.*, Complaint and Request for Fast Track Processing of Agilitas Energy, Inc., Docket No. EL26-105-000 (Sept. 4, 2026); *RWE Americas, LLC v. PJM Interconnection, L.L.C.*, Complaint and Requests for Fast Track Processing and Shortened Answer Period of RWE Americas, LLC, Docket No. EL26-106-000 (Sept. 4, 2026).

[20] Complaint at 4-5, 26-27.

problem responding to the instant Complaint within the shortened comment period.[21] What these arguments fail to recognize, however, is that it takes significant time and resources to thoroughly examine the fulsome Complaint[22] and sort through the technical issues raised in these proceedings. The Commission should afford PJM a meaningful opportunity to respond to the Complaint in a thorough fashion, to enable PJM to build a record and defend its Tariff and its compliance with the Tariff. Otherwise, PJM will be at the mercy of multiple meritless complaints each and every time it reaches a decision point in its interconnection process and removes projects that do not meet the Tariff requirements from the interconnection process. This is antithetical to efficient processing of New Service Requests in accordance with the Tariff rules.[23]

PJM has been working diligently to administer its Tariff and its reformed interconnection process. As discussed above, PJM processed over 800 New Service Requests in Cycle 01 within roughly three months, and is currently working on building the Cycle 01 Base Case model of the projects remaining in Cycle 01, each of which met the Tariff's requirements for a valid Application, so that it can begin Phase I of Cycle 01. This work is a priority for PJM personnel, and is extremely time-consuming, detailed work that requires significant time and attention from the same project managers and planning

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[21] *Id.* at 27 ("As a result, a shortened comment and answer period is also warranted. PJM has been made aware of the facts underlying this Complaint, as evidenced by Exhibits 2 through 5. Further, this is not the first complaint to be levied against PJM's unjust, unreasonable, and unduly discriminatory practice of errantly withdrawing projects from Cycle 01. Similar complaints have been submitted to the Commission in recent weeks. Therefore, a shortened comment and answer period here will not materially impede PJM's ability to respond to this Complaint because it is already responding to similar complaints in these other proceedings." (footnote and citation omitted)).

[22] The Complaint is 62 pages in length.

[23] *See Murphy Solar, LLC*, 195 FERC ¶ 61,034, concur op. (Chairman Swett and Commissioner See), at PP 3, 5 (2026) (noting that elevating "a developer's financial interest in a particular project above the broader public interest" would "disrupt[] orderly interconnection queue administration," whereas allowing the Tariff to work "exactly as designed and as the Commission accepted. . . . allow[s] PJM to more quickly and efficiently process new service requests into finalized interconnection agreements").

engineers that are required to drop everything to answer the Complaint in a very short time period.

As discussed herein, and as PJM will demonstrate in its answer to the Complaint, the Complaint lacks merit and does not meet the Federal Power Act section 206[24] burden to show that PJM's Tariff is not just and reasonable or that PJM has violated its Tariff in its deficiency review of Complainant's Cycle 01 Application. While PJM has information regarding the technical and legal issues raised in the Complaint, PJM nevertheless will need to devote significant time to both technical and legal analysis, sift through pages of technical arguments about the project, identify the information needed to respond to the allegations, conduct any further analysis necessary to respond to the arguments, and draft a thorough response to defend its Commission-approved deficiency review process.[25] In order to provide the Commission with the information it needs to make informed decisions on this Complaint while still administering its high-volume interconnection queue, PJM needs the full 20-day comment period. PJM greatly appreciates that the Office of the Secretary recently permitted the full 20-day comment period in the Agilitas Proceeding[26] and the RWE Proceeding[27] based on these same arguments, and these concerns have only grown as the number of complaints continued to increase.

Therefore, the Commission should decline to grant the Complaint's requested shortened comment period and permit PJM the full 20-day comment period to respond. To

[24] 16 U.S.C. § 824e.

[25] In total, the six Cycle 01 complaints filed to date contain well over 950 pages and address 13 distinct projects.

[26] *Agilitas Energy, Inc. v. PJM Interconnection, L.L.C.*, Errata Notice, Docket No. EL26-105-000 (Sep. 10, 2026) (extending comment date to September 24, 2026).

[27] *RWE Americas, LLC v. PJM Interconnection, L.L.C.*, Errata Notice, Docket No. EL26-106-000 (Sep. 10, 2026) (extending comment date to September 24, 2026).

be clear, PJM is not seeking additional time to respond to the Complaint. Rather, in light of the critical work related to administering a voluminous interconnection queue along with the burden of responding to the current series of meritless complaints, PJM simply seeks the full 20-day comment period currently afforded under the Commission's rules.

III. CONCLUSION

For the reasons set forth above, PJM requests that the Commission decline to grant the shortened comment period requested in the captioned proceeding and instead maintain the standard 20-day answer period for the Complaint. This timing is necessary to give PJM sufficient time to provide the Commission with responses to the highly technical arguments raised in this proceeding.

Respectfully submitted,

/s/ Anne Marie Hirschberger

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September 11, 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 Washington, D.C., this 11th day of September 2026.

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