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.	)	

ANSWER OF PJM INTERCONNECTION, L.L.C.
OPPOSING BOTH THE MOTION TO SUPPLEMENT AND THE MOTION FOR SHORTENED COMMENT PERIOD

Pursuant to Rule 213 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure,[1] PJM Interconnection, L.L.C. ("PJM") hereby files this answer ("Answer") opposing the two motions filed by Lanyard Power Holdings, LLC ("Lanyard Power") seeking leave to supplement the record of the Complaint[2] it recently filed in this docket and to request a shortened comment period.[3] As discussed in its previous emergency motion,[4] PJM has been working diligently to review and draft an answer to the Complaint as well as answers to other 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

[1] 18 C.F.R. § 385.213.

[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] *Lanyard Power Holdings, LLC. v. PJM Interconnection, L.L.C.* Motion for Leave to Supplement the Record and Motion for Shortened Comment Period of Lanyard Power Holdings, LLC, Docket No. EL26-107-000 (Sep. 18, 2026) ("Motions").

[4] *Lanyard Power Holdings, LLC v. PJM Interconnection, L.L.C.*, Emergency Motion of PJM Interconnection, L.L.C. Opposing Shortened Comment Period, Docket No. EL26-107-000 (Sep. 11, 2026) ("PJM Emergency Motion").

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. Now, Lanyard Power not only seeks to supplement the record with further technical information, but it also requests a shortened comment period for *both the Complaint and this supplemental information*, despite the fact that the Office of the Secretary has already issued a notice permitting the full 20-day comment period.[5]

PJM therefore respectfully requests that the Commission deny Lanyard Power's motion to supplement the record and asks the Commission to maintain the notice and comment period due date indicated in the Notice, i.e. September 29, 2026, for the Complaint. Alternatively, should the Commission grant the motion to supplement the record, PJM respectfully requests that the Commission decline to grant the shortened comment period requested in the Motions, and instead establish a new notice and comment period due date for both the Complaint and the supplemental information of October 8, 2026 (the standard 20-day answer period for a complaint).

I. BACKGROUND

Over the past several months, PJM has been working to process the 811 New Service Requests[6] 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.[7] To be considered in a Cycle, all Project Developers must submit a Completed Application that includes all information required under the

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[5] *Blue Branch Solar, LLC*, Combined Notice of Filings #1, Docket Nos. EG26-312-000, et al., at 2 (Sep. 11, 2026) (establishing a comment date of 5:00 PM Eastern Time on September 29, 2026, in Docket No. EL26-107-000) ("Notice").

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

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

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.[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]

During the Application Review Phase, PJM evaluates all Applications from Project Developers to determine whether deficiencies are present, including deficiencies with the 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.[11]

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

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[8] *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].

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

[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, sections 403(B)(1)(a)-(c).

processes,[12] nor from Transition Cycle Nos. 1 and 2.[13] 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.[14] The deficiency review process is also repeated in future Phases of a Cycle, using the same 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.[15]

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[16] requirements specifically, in the months

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[12] *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).

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

[14] IPRTF Filing at 1, 47.

[15] *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).

[16] 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].

leading up to the Cycle 01 Application Deadline.[17] 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 in August 2026. Considering the projects that PJM withdrew from its Cycle 01 interconnection queue and the projects that voluntarily withdrew, over 700 (of the 811 Applications submitted by the deadline) projects remain in Cycle 01.[18]

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 and unreasonable. The first of these complaints were filed by Advantage Capital Renewables, LLC ("Advantage") in Docket No. EL26-99-000[19] and by Oklo Inc. ("Oklo")

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[17] 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].

[18] *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-jm/newsroom/2026-releases/20260803-over-700-new-generation-projects-accepted-into-first-cycle-of-eformedinterconnection-process.pdf [https://perma.cc/9K3B-YCL6].

[19] *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).

in Docket No. EL26-101-000.[20] 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.[21] Since then, four more complaints have been filed, each with extensive records and requests for shortened comment periods,[22] one of which is at issue in this Motion and discussed below.

II. ANSWER OPPOSING THE MOTIONS

A. Lanyard Power has Not Demonstrated Good Cause to Justify Supplementing the Record, and There Is No Justification for Shortening the Comment Due Date for the Complaint.

Through its Motions, Lanyard Power proposes to supplement its Complaint by including an affidavit from its consultant, Mr. R. Peter Mackin, P.E., who Lanyard states was part of the team that "assisted LPH in the modeling, preparation, and submission of the interconnection application to PJM Interconnection, L.L.C. ("PJM") for the Morgantown Battery Project."[23] Since Mr. Mackin was deeply involved throughout Lanyard Power's interconnection application process, presumably from its early stages,

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[20] *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).

[21] *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).

[22] *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) (Withdrawn on September 10, 2026, but required PJM resources nonetheless.); *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).

[23] Motions, Affidavit of R. Peter Mackin, P.E. on Behalf of Lanyard Power Holdings, LLC at 4:3-5 ("Mackin Affidavit").

Lanyard Power should have had this information readily available and been able to prepare the Mackin Affidavit in a timely manner such that the Complaint would have contained the full and complete record for the Commission. Instead, Lanyard Power proposes to supplement its Complaint a week after filing it. Lanyard Power's dilatory filing undermines the claims of urgency it uses to justify a shortened comment period.

According to Lanyard Power, however, it was unable to include the Mackin Affidavit with the Complaint because the consulting firm's "efforts had been focused on supporting [Lanyard Power] in alternative dispute resolution procedures, which was necessary given the technical nature of the deficiencies" and the Mackin Affidavit "required additional attention due to the technical nature of the material."[24] This argument, which echoes PJM's explanation in its Emergency Motion of the time PJM personnel must take to respond to complaints such as Lanyard Power's,[25] makes little sense for a complainant to make, as a complainant chooses when to file its complaint. Having waited over six weeks to file the Complaint, Lanyard Power surely could have waited a few more days so it could file a complete Complaint. In short, Lanyard Power's argument for supplementing its Complaint does not demonstrate good cause for the Commission to grant the motion to supplement.

[24] Motions at 3.

[25] In the Emergency Motion, PJM stated that processing Cycle 01 "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 engineers that are required to drop everything to answer the Complaint in a very short time period." Emergency Motion at 6-7. PJM further stated that although it "has information regarding the technical and legal issues raised in the Complaint, PJM nevertheless will need to devote hours to both technical and legal analysis, sift through dozens of 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 thorough responses to defend its Commission-approved deficiency review process." *Id.*

Further, the cases cited by Lanyard Power are distinguishable. In *Old Dominion Elec. Coop. v. PJM Interconnection, L.L.C.*, the information contained in the motions to supplement the record was new data from an auction that had not yet taken place as of the time previous pleadings were filed.[26] In *SFPP, L.P.*, the motion to supplement was directed at supplementing a previous protest, where the filer was responding directly to arguments made by another party to the proceeding, thereby making it more akin to a response or answer rather than a supplement.[27] In neither instance was there a similar fact pattern to this proceeding, where the complainant claims to have been delayed in providing the information because of the highly technical nature of the material.

For these reasons, PJM requests that the Commission (1) find that Lanyard Power did not meet its burden to demonstrate good cause and deny the Motions, and (2) maintain the comment due date for the Complaint of September 29, 2026, as granted in the Notice.

B. Alternatively, Should the Commission Grant the Motion to Supplement the Record in this Proceeding, the Commission Should Deny the Motion for a Shortened Comment Period and Instead Establish the Standard 20-Day Answer Period.

The Motions seek a shortened comment period of seven days.[28] Once again, Lanyard Power argues that PJM has all the information at hand and therefore would not be harmed by a shortened comment period. While, as stated in the Emergency Motion, PJM does indeed have information concerning Lanyard Power's project and Application, it requires significant time and resources for PJM personnel to thoroughly review the

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[26] *Old Dominion Elec. Coop. v. PJM Interconnection, L.L.C.*, 162 FERC ¶ 61,160, at P 27, *order on reh'g & clarification*, 164 FERC ¶ 61,116 (2018).

[27] *SFPP, L.P. v. SFPP, L.P.*, 102 FERC ¶ 61,073, at P 5 (2003). *See SFPP, L.P. v. SFPP, L.P.*, Supplement to Protest of Tosco Corporation to Compliance Filing of SFPP, L.P. Implementing September 26 Order, Docket Nos. OR92-8-000, et al., at 1-3 (Dec. 2, 202).

[28] Motions at 1-2, 5.

Complaint and prepare a response. The additional information and claims provided in the Mackin Affidavit, which Lanyard Power itself concedes took additional time given the technical nature of the material,[29] require *more time* for PJM to respond, *not less time*, as Lanyard Power requests.

The Commission should afford PJM a meaningful opportunity to respond to the Complaint and the supplemental information in a thorough fashion, to enable PJM to build a record and defend its Tariff and its compliance with the Tariff. PJM has been working diligently to administer its Tariff and its reformed interconnection process. 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 engineers that are required to respond to the Complaint. Lanyard Power's two-step mode of filing its Complaint worsens the distraction caused to PJM personnel and, again, requires more time to respond, not less time.

As PJM will demonstrate in its answer to the Complaint, the Complaint lacks merit and does not meet the Federal Power Act section 206[30] burden to show that PJM's Tariff is not just and reasonable or that PJM has violated its Tariff in its deficiency review of their Cycle 01 Applications. But 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 more time than it has been permitted thus far, including additional time to review and respond to the Mackin Affidavit.

[29] Motions at 3.

[30] 16 U.S.C. § 824e.

PJM therefore respectfully requests that the Commission deny the motion for a shortened comment period for this supplemental filing and instead permit the full 20-day comment period to respond to the Complaint and to the Mackin Affidavit, establishing a new answer date of October 8, 2026, 20 days after Lanyard Power's filing of the Mackin Affidavit, for PJM to respond. To be clear, PJM is not seeking an extension of time to respond to the Complaint or the supplemental information, should the Commission grant that motion. 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.

While Lanyard Power may argue this new answer date is too late, as it will occur after the September 28, 2026, date on which PJM will commence Phase I of Cycle 01, PJM notes, as it has explained in answers to the Advantage and Oklo complaints in Docket Nos. EL26-99-000 and EL26-101-000, that granting any one of these complaints as to Cycle 01 Applications will delay PJM's processing of Cycle 01 by at least two months from the date the Commission issues an order granting one of these complaints. It will take PJM approximately two months to rebuild the Cycle 01 Base Case model after reinserting one of the complainants, a delay that would re-start each time another complaint is granted. Such a delay would harm the other Project Developers in Cycle 01, who submitted complete and valid Applications and expect them to be processed in a timely fashion and, of course, would delay the interconnection of much-needed generation capacity.

III. CONCLUSION

For the reasons set forth above, PJM requests that the Commission decline to grant the motion to supplement the Complaint and the motion for a shortened comment period requested in the captioned proceeding and instead maintain the standard 20-day answer period. If the Commission chooses to grant the motion to supplement the Complaint, it should grant a new answer date of October 8, 2026. 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,

<u>/s/ Anne Marie Hirschberger</u>

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September 22, 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 22nd day of September 2026.

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