

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

Building for the Future Through Electric	)	
Regional Transmission Planning and	)	Docket No. RM21-17-000
Cost Allocation	)	

UNOPPOSED JOINT MOTIONS TO GOVERN FURTHER PROCEEDINGS

Pursuant to the Federal Energy Regulatory Commission’s (“FERC’s” or the “Commission’s”) Notice of Extension of Time issued on September 15, 2026,¹ the PJM Area Relevant State Entities Committee (“PARSEC”),² the PJM Transmission Owners,³ and PJM Interconnection, L.L.C. (“PJM”) (collectively, the “Joint Movants”), submit this joint motion to govern in this proceeding. This motion proposes a schedule for the PJM Transmission Owners to submit a proposed Long-Term Regional Transmission Cost Allocation Methodology pursuant to Federal Power Act § 205, a separate attached proposal by the PARSEC, and a schedule for PJM to submit related revisions to its Long-Term Regional Transmission Planning Protocol (“LTRTP Protocol”) in compliance with Order No. 1920.⁴

After many years of extensive and meaningful discussions, including recently with the assistance of the Commission’s Dispute Resolution Service, the PJM Transmission Owners and PARSEC (together, the “Parties”) were unable to reach agreement on a cost allocation structure for Order No. 1920 projects. Thus, the Parties have agreed to discontinue their discussions. As

¹ *Notice of Extension of Time*, Docket No. RM21-17-000 (Sept. 15, 2026) (“September 15, 2026 Notice of Extension of Time”).

² The PARSEC is a group of Relevant State Entities (“RSEs”) responsible for electric utility regulation or siting electric transmission facilities within the PJM region as defined in Order Nos. 1920 and 1920-A. PARSEC approved this motion pursuant to its Charter on September 24, 2026.

³ *See* PJM, Open Access Transmission Tariff (“PJM OATT”), § 9, Regulatory Filings. Because the PJM Transmission Owners have Federal Power Act § 205 filing rights over the cost allocation provisions of PJM’s OATT, they are the transmission provider responsible for the compliance filing to amend PJM’s Tariff in accordance with the cost allocation requirements of Order Nos. 1920 and 1920-A.

⁴ *Bldg. for the Future Through Elec. Reg’l Transmission Planning & Cost Allocation*, Order No. 1920, 187 FERC ¶ 61,068 (“Order No. 1920”), *order on reh’g*, Order No. 1920-A, 189 FERC ¶ 61,126 (2024), *order on reh’g*, Order No. 1920-B, 191 FERC ¶ 61,026 (2025).

such, they request the Commission establish a new compliance filing deadline of November 19, 2026. On that date, the PJM Transmission Owners will file proposed tariff changes to comply with Order No. 1920, attaching alternative changes proposed by PARSEC.⁵

The Commission granted four extensions of the Engagement Period and the cost allocation compliance deadline before this resolution.⁶ In its June 11, 2026 Notice of Extension of Time, the Commission made its Dispute Resolution Service available to the Parties.⁷ As indicated in the notice issued by Director of Dispute Resolution Services on July 10, 2026 and described in the parties' Motions for Extension of Time filed on August 4 and September 8, 2026, the Parties engaged those services and steadfastly worked towards a settlement agreement satisfactory to all. The last scheduled compliance deadline was September 10, 2026, prior to the Commission's grant of the Joint Movants' Motion for Extension of Time. In that motion, the Joint Movants requested that the Commission grant a further extension to continue discussions and further indicated that they would file a motion to govern on September 25, 2026, establishing a schedule for submission of the compliance filing.⁸ The Commission granted that motion on September 15, 2026.⁹

⁵ The PJM Transmission Owners have petitioned for review of the requirement to attach an alternate PARSEC Order No. 1920 cost allocation proposal. That petition is currently pending before the United States Court of Appeals for the 4th Circuit in *Appalachian Voices v. FERC*, Docket No. 24-1650 (argued Sept. 15, 2026). The PJM Transmission Owners believe that any filing that would impose the inclusion requirement before the date the 4th Circuit rules on the petition risks violation of the PJM Transmission Owners' rights under Federal Power Act and the 1st Amendment to the United States Constitution. The Transmission Owners reserve the right to take any action necessary to protect those rights, and by joining this motion do not waive their right to do so. PJM takes no position, and the PARSEC does not agree with the PJM Transmission Owners' claims.

⁶ *Notice of Extension of Time*, Docket No. RM21-17-000 (Feb. 6, 2025); *Notice of Extension of Time*, Docket No. RM21-17-000 (Oct. 17, 2025); June 11, 2026 Notice of Extension of Time; *Notice of Extension of Time*, Docket No. RM21-17-000 (Aug. 11, 2026).

⁷ June 11, 2026 Notice of Extension of Time.

⁸ *Bldg. for the Future Through Elec. Reg'l Transmission Planning & Cost Allocation*, Unopposed Joint Motion for Extension of Time to File Mots. to Govern, Request for Expedited Consideration, & Waiver of Comment Period, Docket No. RM21-17-000 (filed Sept. 8, 2026).

⁹ September 15, 2026 Notice of Extension of Time.

Accordingly, the Joint Movants respectfully request that the Commission establish a new compliance deadline of November 19, 2026 for the PJM Transmission Owners' submission of the proposed cost allocation for 1920 transmission projects in PJM. This will allow both Parties to coordinate their respective contributions to the compliance filing. First, the PJM Transmission Owners will draft proposed tariff sheets that reflect their Order No. 1920 long-term regional planning cost allocation proposal to be filed pursuant to Federal Power Act § 205. PARSEC may need additional time to finalize any submission to be attached to the PJM Transmission Owners' filing.

Second, both the PJM Transmission Owners and the PARSEC will need to vote on the proposal as required by their respective governing documents.¹⁰ Finally, the PJM Transmission Owners must prepare the compliance filing and work with PJM to submit the filing through its eTariff filing protocols. A compliance deadline of November 19, 2026 provides for the time necessary to allow each of these steps to occur.

The Joint Movants also request a deadline of December 22, 2026 for PJM to submit any tariff revisions to the PJM Tariff and Operating Agreement to reflect changes to the planning process necessary to accommodate the proposed cost allocation. As PJM has discussed throughout this proceeding, cost allocation is inextricably intertwined with PJM's proposed LTRTP Protocol. To facilitate the Commission's consideration of each cost allocation approach, PJM intends to submit illustrative LTRTP Protocol revisions to demonstrate how the LTRTP Protocol could operate in conjunction with either proposed cost allocation methodology and to provide the Commission with a complete record regarding implementation of those features.

¹⁰ PJM Area Relevant State Entities Comm. Charter, Org. of PJM States, Inc. (Sept. 19, 2024), <https://opsi.us/wp-content/uploads/2024/10/PJM-Area-Relevant-State-Entities-Committee-Charter.pdf>; Consolidated Transmission Owners Agreement, Transmission Owners (May 31, 2024), <https://www.pjm.com/-/media/DotCom/committees-groups/committees/toa-ac/2024/20240613-special/final-ctoa-amendments-proposal-clean-5-31-2024.pdf>.

Therefore, once the PJM Transmission Owners and the PARSEC have developed their respective approaches—and before submitting its compliance filing, PJM will need time to review each approach, develop proposed LTRTP Protocol revisions to implement each approach, and present such proposed LTRTP Protocol revisions to stakeholders. Given the Parties' requested November 19, 2026 compliance filing date, PJM respectfully requests a compliance filing date of no later than December 22, 2026. Such deadline will afford PJM sufficient time to (1) develop its approach, (2) hold a public stakeholder meeting detailing how PJM plans to change the LTRTP Protocols to implement each respective cost allocation approach in the LTRTP Protocol, (3) consider stakeholder feedback, and (4) finalize and submit its compliance filing. PJM will endeavor to submit its compliance filing earlier, but given that it does not currently know the PJM Transmission Owners' or PARSEC's cost allocation approaches, PJM cannot assess the complexity of the LTRTP Protocol revisions that may be necessary to implement either approach.

The Joint Movants believe that the schedule proposed herein will provide the Commission with an orderly and efficient process for submitting tariff provisions and proposals compliant with Order No. 1920. Accordingly, the Joint Movants respectfully request that the Commission adopt the schedule as proposed herein.

Respectfully Submitted,

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Dated: September 25, 2026

CERTIFICATE OF SERVICE

Pursuant to Rule 2010, 18 C.F.R. § 385.2010, I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated in Washington, D.C. on this 25th day of September 2026.

/s/ Jeannette Crooks

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