

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

RWE Americas, LLC	)	
	)	
Complainant,	)	
	)	Docket No. EL26-106-000
v.	)	
	)	
PJM Interconnection, L.L.C.,	)	
Respondent.	)	

**MOTION FOR LEAVE TO ANSWER AND ANSWER
OF PJM INTERCONNECTION, L.L.C.**

Pursuant to Rules 212 and 213 of the Federal Energy Regulatory Commission (“Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) respectfully submits this Motion for Leave to Answer and Answer to the answer filed on October 23, 2026, in this proceeding² by RWE Americas, LLC (“RWE”).

The question before the Commission in this proceeding is whether PJM followed its Tariff in determining that the Applications associated with PJM Project Identifier Nos. C01-1680, C01-1681, C01-1687, C01-1705, and C01-1708 (collectively, “RWE Projects”) should be rejected. As PJM has made clear, the answer is yes.³ The October 23 Answer offers nothing to alter this conclusion. The Commission should therefore deny the Complaint.

¹ 18 C.F.R. §§ 385.212, 385.213.

² *RWE Americas, LLC v. PJM Interconnection, L.L.C.*, Motion for Leave to Answer and Answer of RWE Americas, LLC, Docket No. EL26-106-000 (Oct. 23, 2026) (“October 23 Answer”).

³ *See RWE Americas, LLC v. PJM Interconnection, L.L.C.*, Answer of PJM Interconnection, L.L.C., Docket No. EL26-106-000 (Sep. 24, 2026) (“Complaint Answer”).

I. MOTION FOR LEAVE TO ANSWER

While an answer to an answer is not a matter of right under the Commission's regulations,⁴ the Commission routinely permits such answers when the answer provides useful and relevant information that will assist the Commission in its decision-making process,⁵ assures a complete record in the proceeding,⁶ and provides information helpful to the disposition of an issue.⁷ This answer satisfies these criteria, and PJM therefore respectfully requests that the Commission accept this pleading.

II. ANSWER

At the Interconnection Process Subcommittee ("IPS") meeting held on October 23, 2026, PJM announced a delay in posting the Transition Cycle 2 ("TC2") Phase III System Impact Study ("SIS") results, with the modified TC2 schedule reflecting a new date of Friday, March 5, 2027, and Cycle 01 Phase I SIS results, with the modified Cycle 1 schedule reflecting a new date of Friday, March 26, 2027.⁸ As explained at the IPS meeting, the updated posting dates reflect the impact of progressing two Cycles (TC2 and Cycle 01) in parallel, involving a significant volume of data review, analysis, and solution development, the sequencing of the Cycle 01 Phase I SIS posting after the TC2

⁴ 18 C.F.R. § 385.213(a)(2).

⁵ See, e.g., *Pioneer Transmission, LLC v. N. Ind. Pub. Serv. Co.*, 140 FERC ¶ 61,057, at P 94 (2012) (accepting answers that "provided information that assisted us in our decision-making process"); *Tallgrass Transmission, LLC*, 125 FERC ¶ 61,248, at P 26 (2008) (same); *Midwest Indep. Transmission Sys. Operator, Inc.*, 120 FERC ¶ 61,083, at P 23 (2007) (permitting answer to protests when it provided information that assisted the Commission in its decision-making process).

⁶ See, e.g., *Pac. Interstate Transmission Co.*, 85 FERC ¶ 61,378, at 62,443 (1998), *order on reh'g*, 89 FERC ¶ 61,246 (1999); see also *Morgan Stanley Cap. Grp., Inc. v. N.Y. Indep. Sys. Operator, Inc.*, 93 FERC ¶ 61,017, at 61,036 (2000) (accepting an answer that was "helpful in the development of the record").

⁷ See, e.g., *CNG Transmission Corp.*, 89 FERC ¶ 61,100, at 61,287 n.11 (1999).

⁸ Lisa Krizenoskas, *Cycle Schedule Update*, PJM Interconnection, L.L.C., at 3-6 (Oct. 23, 2026), <https://www.pjm.com/-/media/DotCom/committees-groups/subcommittees/ips/2026/20261023/20261023-item-03---october-cycle-schedule-update.pdf>.

Phase III SIS posting, and the preparation of an unprecedented number of service agreements for TC2.

RWE argues that these recent schedule updates somehow advance their claim that reinstatement of the RWE Projects will not significantly delay Cycle 01. RWE both mischaracterizes and misapprehends PJM's statements to suggest that "PJM has not started its studies [and] will not start its studies for at least a month."⁹ The Commission should not be swayed by Complainant's attempts to obfuscate the facts and detract from the issue at hand. As previously stated,¹⁰ Phase I already began as of September 28, 2026, therefore the updated posting date for the Cycle 01 Phase I SIS report pertains to the extension of the projected *end* date for Phase I.

PJM maintains that the reinstatement of the RWE Projects will delay Cycle 01, and the recent updates to the TC2 and Cycle 1 posting dates do not alter this position. Inserting the RWE Projects into the Cycle 01 Base Case Model at this stage would only further delay Cycle 01 by up to two months and could also change outcomes for other Cycle 01 projects. The 30-day period to review the Base Case model has ended and PJM currently is running the Phase I study. Now that Phase I has begun, it is too late for Project Developers to withdraw from Cycle 01. If PJM must rebuild and repost its model to include the RWE Projects, certain Project Developers may conclude that they should have withdrawn before Phase I started due to changes to the model spurred by the addition of the RWE Projects that were not previously included. If those Project Developers withdraw due to the changes to the Base Case model caused by insertion of the RWE Projects, they may be required to

⁹ October 23 Answer at 1.

¹⁰ *RWE Americas, LLC v. PJM Interconnection, L.L.C.*, Motion for Leave to Answer and Answer of PJM Interconnection, L.L.C., Docket No. EL26-106-000, at 6 (Oct. 5, 2026) ("October 5 Answer").

forfeit their Readiness Deposits, even though they reasonably relied on the model PJM posted on August 28, 2026. Accordingly, reinstatement of the RWE Projects would harm the other Project Developers for the 617 projects in Cycle 01,¹¹ who submitted complete and valid Applications and expect them to be processed in a timely fashion and delay the interconnection of much-needed generation capacity. RWE's requested relief should therefore be denied.

¹¹ PJM Inside Lines, *Over 600 Projects Enter Phase I of PJM's New Interconnection Process*, (Sep. 30, 2026) <https://insidelines.pjm.com/over-600-projects-enter-phase-1-of-pjms-new-interconnection-process/>.

III. CONCLUSION

For the reasons set forth above, the Commission should deny the Complaint.

Respectfully submitted,

/s/ Salvia Yi

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October 26, 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 26th day of October 2026.

/s/ *Salvia Yi*

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