UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Pennsylvania Public Utility Commission,	)	
	)	
v.	)	**Docket No. EL26-98-000**
	)	
PJM Interconnection, L.L.C.	)	

UNOPPOSED MOTION OF PJM INTERCONNECTION, L.L.C.
FOR EXTENSTION OF TIME TO RESPOND TO LATE-FILED INTERVENTION

In accordance with Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission,[1] PJM Interconnection, L.L.C. (PJM) submits this unopposed motion for an extension of time to respond to the Motion to Intervene Out of Time, Motion for Leave to Answer, and Answer filed by the New Jersey Division of Rate Counsel (Rate Counsel) on October 14, 2026. PJM is authorized to state that Rate Counsel has stipulated to this extension of time until PJM's response would be due to any filing made by the Pennsylvania Public Utility Commission (PAPUC) pursuant to the Commission's October 13, 2026 Notice of Extension of Time. That notice extended the deadline for PAPUC's response to November 12, 2026. Accordingly, PJM respectfully requests that the Commission grant this motion, accept the parties' stipulation, and allow PJM to combine its response to Rate Counsel's answer with PJM's response to any filing made by the PAPUC on November 12.

[1] 18 C.F.R. §§ 385.212 (2026).

Respectfully submitted,

/s/ John Lee Shepherd, Jr.

John Lee Shepherd, Jr.
Blake Grow
Hunton Andrews Kurth LLP
2200 Pennsylvania Avenue, NW
Washington, DC 20037
(202) 419-2135
(202) 955-1991
jshepherd@hunton.com
bgrow@hunton.com

Craig Glazer
Vice President-Federal Gov't Policy
PJM Interconnection, L.L.C.
1200 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 423-4743 (phone)
craig.glazer@pjm.com

Aspassia V. Staevska
Assistant General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
(484) 401-4931
aspassia.staevska@pjm.com

October 27, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have on this day caused to be served a copy of the foregoing motion upon all parties on the service list in these proceedings in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2023).

/s/ Blake Grow
Blake Grow
Hunton Andrews Kurth LLP
2200 Pennsylvania Avenue, NW
Washington, DC 20037
(202) 955-1500
bgrow@hunton.com

October 27, 2026