UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

KOREnergy, Ltd.	)	Docket No. ER27-498-000

MOTION TO INTERVENE AND COMMENTS OF PJM INTERCONNECTION, L.L.C.

Pursuant to Rules 213(a)(3) and 214(a)(3) of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure,[1] PJM respectfully moves to intervene in this proceeding and submits this Answer in response to the Petition of KOREnergy, Ltd. ("KOREnergy") for a Limited Waiver and Request for Expedited Action.[2] As discussed herein, PJM takes no position on KOREnergy's request for a limited waiver of the deadline set forth in the PJM Open Access Transmission Tariff ("Tariff"), Attachment DD-1, section A(5), and the parallel provisions of the Reliability Assurance Agreement ("RAA"), Schedule 6, section A(5), governing the submission of a Demand Resource Sell Offer Plan in this limited instance.[3] In order to ensure the Commission has all the information it requires to render a decision on this waiver request, PJM further notes that, should the Commission grant the requested relief on or before December 7, 2026,

[1] 18 C.F.R. §§ 385.213 and 385.214.

[2] *KOREnergy, LTD.,* Petition of KOREnergy, Ltd. for Limited Waiver, Request for Shortened Comment Period, and Request for Expedited Action, Docket No. ER27-498-000 (Nov. 13, 2026).

[3] All references to Tariff, Attachment DD-1, section A(5) in this answer also reference the parallel provisions of the RAA, Schedule 6, section A(5).

PJM will be able to review and process KOREnergy's late-filed Demand Resource Sell Offer Plan for participation in the Base Residual Auction for the 2029/2030 Delivery Year.[4]

I. MOTION TO INTERVENE

On November 13, 2026, KOREnergy filed a request for limited waiver of PJM's Tariff with respect to the deadline to submit a Demand Resource Sell Offer Plan for the Base Residual Auction associated with the 2029/2030 Delivery Year. As the administrator of the PJM Tariff, as well as the entity that reviews Demand Resource Sell Offer Plans and administers the Reliability Pricing Model Auctions, PJM has an independent interest in this proceeding that no other party can adequately represent. Accordingly, PJM respectfully requests that the Commission grant this motion to intervene and that PJM be afforded all the rights of a party to this proceeding.

II. PJM TAKES NO POSITION ON THE REQUESTED WAIVER

PJM's Tariff provides, in relevant part, that a "Curtailment Service Provider shall submit a Demand Resource Sell Offer Plan . . . no later than 30 days prior to, as applicable, the RPM Auction in which such resource is to be offered, or the deadline for submission of the FRR Capacity Plan in which such resource is to be included."[5] For the Base Residual Auction associated with the 2029/2030 Delivery Year, the deadline for Curtailment Service Providers to submit the Demand Resource Sell Offer Plan was November 9, 2026.[6] This deadline provides PJM with sufficient time to review and approve Demand Resource Sell

[4] For the purpose of this filing, capitalized terms not defined herein shall have the meaning as contained in the PJM Open Access Transmission Tariff, Amended and Restated Operating Agreement, and the Reliability Assurance Agreement Among Load Serving Entities in the PJM Region.

[5] Tariff, Attachment DD, section 5.5.

[6] PJM, RPM Auction Schedule, https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/rpm-auction-schedule.xlsx.

Offer Plans before the relevant RPM Auction. Curtailment Service Providers with approved Demand Resource Sell Offer Plans may then offer up to the approved Demand Resource quantity into the applicable RPM Auction.[7]

Here, KOREnergy submitted its Demand Resource Sell Offer Plan for the 2029/2030 Base Residual Auction after the applicable Tariff deadline.[8] PJM recognizes that the submission deadlines codified in the Tariff exist for good reason, and the deadlines would be rendered meaningless if waivers were granted any time a deadline was missed or ignored. Nevertheless, PJM takes no position on KOREnergy's requested waiver in this limited instance. PJM's non-opposition is based on the specific facts presented here, including the resource adequacy concerns associated with the 2029/2030 Delivery Year and PJM's ability to accommodate KOREnergy's late-filed Demand Resource Sell Offer Plan without disrupting the administration of the auction process. PJM understands that KOREnergy is the only Curtailment Service Provider seeking relief from this deadline for the 2029/2030 Base Residual Auction. As a result, PJM remains able to review KOREnergy's Demand Resource Sell Offer Plan prior to the commencement of the auction and to provide any required notifications under the Tariff. Specifically, PJM intends to review KOREnergy's Demand Resource Sell Offer Plan and, if PJM identifies "the same end-use customer site(s) in their respective DR Sell Offer Plans for the same Delivery Year," notify KOREnergy and the relevant Demand Resource Provider no later than ten Business Days prior to the auction, consistent with the requirements of the Tariff.[9]

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[7] Tariff, Attachment DD-1, section A(5).

[8] *KOREnergy, LTD.,* Petition of KOREnergy, Ltd. for Limited Waiver, Request for Shortened Comment Period, and Request for Expedited Action, Docket No. ER27-498-000, at n.9 (Nov. 13, 2026).

[9] *See* Tariff, Attachment DD-1, section A-1(3).

III. CONCLUSION

For the reasons provided herein, PJM takes no position on KOREnergy's request for a waiver of the binding notice of intent requirement in this limited circumstance. Additionally, to ensure the Commission is fully informed when arriving at a decision regarding this waiver request, PJM can accommodate KOREnergy's participation in the 2029/2030 Base Residual Auction so long as the Commission issues an order granting the requested waiver prior to December 7, 2026.

Respectfully submitted,

/s/ Chenchao Lu

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On behalf of
PJM Interconnection, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that I have on 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, PA on this 23th day of November 2026.

/s/ Chenchao Lu
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