

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

PJM Interconnection, L.L.C., et al.	Docket Nos. EL25-49-002 EL25-49-000
Large Loads Co-Located at Generating Facilities	AD24-11-001
Constellation Energy Generation, LLC	EL25-20-001 (consolidated)
v.	
PJM Interconnection, L.L.C.	
PJM Interconnection, L.L.C.	ER26-1479-000

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

Pursuant to Rules 212 and 213 of the Rules of Practice and Procedure¹ of the Federal Energy Regulatory Commission (“Commission”), PJM Interconnection, L.L.C. (“PJM”) moves for leave to answer the Answer of Constellation Energy Generation, LLC (“Constellation”) concerning PJM’s motion to extend certain compliance obligations.² Constellation generally supports PJM’s motion, but asks the Commission to clarify that the partial compliance on August 17, 2026, must include a complete set of provisions for Interim Network Integration Transmission Service (“NITS”) and address certain related directives from the Commission’s June order.³ PJM is moving for leave to answer to

¹ 18 C.F.R. §§ 385.212, 385.213.

² *PJM Interconnection, L.L.C.*, Answer of Constellation Energy Generation, LLC, Docket Nos. EL25-49-000, et al. (Aug. 3, 2026) (“Constellation Answer”); *PJM Interconnection, L.L.C.*, Motion for Extension of Time for Specified Compliance Requirements and Request for Expedited Treatment of PJM Interconnection, L.L.C., Docket Nos. EL25-49-000, et al. (July 28, 2026) (“PJM Motion for Extension of Time”).

³ Constellation Answer at 1-2.

provide additional information to aid the Commission’s decision-making process. As further explained below, PJM intends to address all the terms and conditions concerning Interim NITS in the August 17, 2026 compliance filing and the points identified in Constellation’s answer. Accordingly, the Commission should grant PJM’s motion for an extension of time.

I. BACKGROUND

On June 18, 2026, the Commission issued an order on rehearing, clarification, compliance filing, and paper hearing (“June 18 Order”), which largely accepted PJM’s proposed Open Access Transmission Tariff (“Tariff”) changes but directed PJM to make a number of additional changes within sixty days.⁴ On July 28, 2026, PJM moved to extend the deadline to comply with some of the directives in the June 18 Order.⁵ As explained in PJM’s motion, PJM has been working to address all the points in the Commission’s order.⁶ Because the Commission initiated a new show cause proceeding concerning Large Load on June 18, 2026, that addresses many interrelated issues, PJM is seeking additional time to consider certain related requirements in developing a section 205 filing to comply with the Large Load show cause order.

On August 3, 2026, the PJM Industrial Customer Coalition filed an answer in support of PJM’s extension request.⁷ The PJM Industrial Customer Coalition agreed with

⁴ *PJM Interconnection, L.L.C.*, 195 FERC ¶ 61,209, at ordering paras. (C)-(H) (2026).

⁵ PJM Motion for Extension of Time at 7-8.

⁶ *Id.* at 2-6.

⁷ *PJM Interconnection, L.L.C.*, Answer in Support of the PJM Industrial Customer Coalition to the Motions for Extension and Abeyance by PJM Interconnection, L.L.C., Docket Nos. EL25-49-000, et al. (Aug. 3, 2026).

PJM's proposed approach to conserve stakeholder and party resources and work efforts while allowing time for additional discussion with stakeholders.⁸

Also on August 3, 2026, Constellation filed an answer to PJM's motion for an extension of certain requirements.⁹ Constellation agreed with PJM's proposal to move forward with implementing Interim NITS while deferring implementation of the contract demand services.¹⁰ Constellation, however, sought clarification that PJM intended to propose a complete set of provisions for Interim NITS and address specified issues in its upcoming August compliance filing.¹¹

II. MOTION FOR LEAVE TO ANSWER

Although the Commission's Rules of Practice and Procedure generally do not permit answers to protests, such pleadings are permitted where, as here, the information provided will facilitate the Commission's decisional process, clarify the record, or aid in the explication of issues.¹² This answer will provide the Commission with information that will aid its decision-making process with respect to Constellation's request for clarification. Therefore, PJM respectfully requests that the Commission accept this answer.

⁸ *Id.* at 2-3.

⁹ *See generally* Constellation Answer.

¹⁰ *Id.* at 2.

¹¹ *Id.* at 1-2.

¹² *See* 18 C.F.R. § 385.213(a)(2); *see, e.g., PJM Interconnection, L.L.C.*, 193 FERC ¶ 61,192, at P 28 (2025) (accepting PJM's answer to protests because it provided information that assisted the Commission in its decision-making process), *order addressing arguments raised on reh'g*, 195 FERC ¶ 61,002 (2026); *PJM Interconnection, L.L.C.*, 176 FERC ¶ 61,163, at P 2 (2021) (accepting PJM's answer to protests because it provided information that assisted the Commission in its decision-making process); *Morgan Stanley Cap. Grp., Inc. v. N.Y. Indep. Sys. Operator, Inc.*, 93 FERC ¶ 61,017, at 61,036 (2000) (accepting an answer as helpful in the development of the record).

III. ANSWER

Constellation asked the Commission to clarify in granting PJM's extension motion that specific directives concerning Interim NITS would be addressed in the compliance filing PJM intends to make on August 17, 2026.¹³ As discussed below, PJM intends to address each of the identified requirements.

First, Constellation asks the Commission to clarify that PJM will consider an earlier effective date for Interim NITS given the urgency surrounding this issue.¹⁴ PJM has evaluated opportunities to implement Interim NITS earlier than other new transmission services, consistent with the Commission's directive. PJM intends to propose a new and earlier effective date for Interim NITS in the August compliance filing.

Second, Constellation asks the Commission to clarify that PJM will comply with the Commission's directive to "[e]xplain what new and existing interconnection requirements and operational practices are needed for necessary control technologies and/or protection systems for Eligible Customers taking Interim NITS."¹⁵ PJM intends to address this directive in the August compliance filing.

Third, Constellation asks the Commission to clarify that PJM will address curtailment priorities for Interim NITS in the August compliance filing.¹⁶ Consistent with the illustrative Tariff language PJM previously filed and the Commission's directives in the June 18 Order, PJM will include Tariff language addressing curtailment priority for Interim NITS in the August compliance filing.

¹³ Constellation Answer at 2-3.

¹⁴ *Id.* at 2.

¹⁵ *Id.* (internal quotation marks omitted).

¹⁶ *Id.* at 3.

Finally, Constellation requested clarification that PJM will comply with the Commission's directive regarding conversion of Interim NITS to NITS upon completion of the necessary upgrades.¹⁷ PJM included proposed Tariff language regarding such a conversion in the illustrative Tariff language it filed previously in this proceeding.¹⁸ However, PJM does intend to clarify this aspect of Interim NITS service further in the compliance filing on August 17, 2026.

IV. CONCLUSION

For the foregoing reasons, PJM requests that the Commission: (1) grant this motion for leave to answer; (2) consider this answer; and (3) grant the motion for extension of certain compliance obligations.

¹⁷ *Id.*

¹⁸ See *PJM Interconnection, L.L.C.*, Reply Brief of PJM Interconnection, L.L.C., Attachment A, Redlines on Reply Brief to Illustrative Language for New Tariff, Part XI; Attachments F-3A and F-4; and Other Illustrative Tariff Revisions, Docket Nos. EL25-49-000, et al., at section 701.1 (Apr. 24, 2026).

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Respectfully submitted,

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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 10th day of August 2026.

/s/ Ruth M. Porter

Ruth M. Porter

Attorney for

PJM Interconnection, L.L.C.