

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

PJM Interconnection, L.L.C.

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**Docket Nos. ER26-3380-000
EL26-108-000**

**MOTION FOR ABEYANCE OF
PJM INTERCONNECTION, L.L.C.**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) respectfully requests that the Commission hold the paper hearing proceedings, including any additional briefings, in this docket in abeyance pending resolution of PJM’s forthcoming filing that will be submitted under section 205 of the Federal Power Act (“FPA”) addressing the issues raised in the Commission’s September 29 Order.²

In the September 29 Order, the Commission accepted PJM’s proposed reliability backstop procurement (“RBP”) rules, but suspended those rules for five months to allow time for further briefing through a paper hearing process to further review three discrete areas of the RBP: cost allocation, Transmission Owner exit rules, and LSE collateral requirements.³ While the Commission established additional paper hearing procedures and a separate proceeding under section 206 of the FPA in its September 29 Order, the Commission “strongly encourage[d] PJM to address the issues discussed in [the] order by submitting an alternative proposal pursuant to its FPA section 205 filing rights without delay.”⁴ The September 29 Order further explained that “the

¹ 18 C.F.R. § 385.212.

² *PJM Interconnection, L.L.C.*, 196 FERC ¶ 61,245 (2026) (“September 29 Order”).

³ *Id.* at P 24.

⁴ *Id.* at P 28.

Commission would grant a motion to hold that briefing in this proceeding in abeyance if PJM submitted a new section 205 filing within 30 days from the date of this order.”⁵

In accordance with the Commission’s September 29 Order, and to help expedite a resolution of the remaining issues identified by the Commission, PJM plans to submit a new FPA section 205 filing that addresses, *inter alia*, cost allocation issues, Transmission Owner exit responsibilities, and LSE collateral requirements as they relate to RBP by October 29, 2026. To that end, PJM has scheduled a special Members Committee and a special Transmission Owners Agreement – Administrative Committee meeting on October 22, 2026 to provide the requisite consultation with the PJM Members Committee and Transmission Owners of the new FPA section 205 filing in accordance with Tariff, section 9.2(b) and the Consolidated Transmission Owners Agreement, section 7.5.1(ii), respectively.

Filing this motion for abeyance at this time allows the Commission to timely consider this request and grant the abeyance so that interested parties can focus efforts on the upcoming section 205 filing rather than having to separately prepare for the paper hearing briefing under the current timelines specified in the September 29 Order. For these reasons, the Commission should expeditiously grant this motion to hold the paper hearing proceedings in abeyance.

⁵ *Id.* at PP 24 and 160.

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Respectfully submitted,

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On behalf of
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 12th day of October served a copy of the foregoing 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.

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