

As PJM described in its December 3, 2018 transmittal letter, the ESR Accounting Proposal is “limited in scope to only those changes necessary to accommodate the required metering and accounting testing,” and consists solely of changes to the definitions of “Energy Storage Resource” and “Capacity Storage Resource” in the PJM Open Access Transmission Tariff (“Tariff”) and the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. (“Operating Agreement”) to conform with the Commission’s definition of “electric storage resource.”⁵ PJM stated that it was requesting an effective date of February 3, 2019 specifically to provide enough time to develop and test its metering and accounting practices prior to implementation of the ESR Participation Model⁶ on December 3, 2019, and explained that its rationale for bifurcating its Order No. 841 compliance filing was “to allow the Commission to independently review and grant the ESR Accounting Proposal on an expedited basis.”⁷

In light of these facts, PJM and the Movants have reached consensus that a 45-day extension of the comment period for this particular proceeding (Docket No. ER19-462-000) is unnecessary, and the Movants have authorized PJM to represent this consensus to the Commission on their behalf. PJM notes that this consensus is applicable only to the 45-day extension request for this proceeding (Docket No. ER19-462-000), and PJM does not oppose the granting of any such 45-day extension in its parallel Order No. 841 compliance proceeding, Docket No. ER19-469-000.

PJM believes that a 45-day extension of the comment period is unnecessary and would frustrate PJM’s primary purpose in submitting the ESR Accounting Proposal separately and

⁵ *Id.* at 2, 6-8.

⁶ *See generally* Docket No. ER19-469-000.

⁷ ESR Accounting Proposal at 2-3.

seeking expedited approval, because it would place the comment period for this proceeding beyond the effective date proposed in the originating tariff filing (February 3, 2019). However, in the event that the Commission determines to grant additional time to commenters, PJM would support extending the comment period to no later than January 4, 2019.

Respectfully submitted,

/s/ Thomas DeVita

Craig Glazer
Vice President – Federal Government Policy
PJM Interconnection, L.L.C.
1200 G Street, N.W.
Suite 600
Washington, D.C. 20005
(202) 202-423-4743
Craig.Glazer@pjm.com

Thomas DeVita
Senior Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403
(610) 635-3042
Thomas.DeVita@pjm.com

Jennifer Tribulski
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
(610) 666-4363
Jennifer.Tribulski@pjm.com

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

CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of December, 2018 caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Thomas DeVita

Thomas DeVita

Senior Counsel

PJM Interconnection, L.L.C.

2750 Monroe Boulevard

Audubon, PA 19403

(610) 635-3042

Thomas.DeVita@pjm.com