

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

American Municipal Power Inc.,)	
Office of the People’s Counsel for)	
the District of Columbia, and the)	
PJM Industrial Customer)	
Coalition,)	
Complainants)	Docket No. EL22-80-000
)	
v.)	
)	
PJM Interconnection, L.L.C.,)	
Respondent.)	

**MOTION FOR EXTENSION OF TIME
AND REQUEST FOR EXPEDITED ACTION
OF PJM INTERCONNECTION, L.L.C.**

PJM Interconnection, L.L.C. (“PJM”), pursuant to Rules 212 and 2008 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),¹ respectfully requests a two-week extension of time to answer the complaint filed by American Municipal Power, Inc., Office of the People’s Council for the District of Columbia, and the PJM Industrial Customer Coalition (collectively, “Complainants”) against PJM in the captioned proceeding.² The requested extension would extend the deadline for the answer to the Complaint, currently set at August 15, 2022, to August 29, 2022. PJM is authorized to state that Complainants do not oppose this motion. In recognition of Complainants’ non-opposition, PJM further requests that the Commission waive the answer period for this motion and grant PJM’s extension request as expeditiously as possible, but no later than August 9, 2022. There is good cause for the

¹ 18 C.F.R. §§ 385.2008(a), 385.212.

² *American Municipal Power, Inc. v. PJM Interconnection, L.L.C.*, Complaint Requesting Fast Track Processing, Docket No. ER22-80-000 (July 26, 2022) (“Complaint”).

Commission to approve the brief requested extension of the current deadline, as set forth below.

I. MOTION FOR EXTENSION AND REQUEST FOR EXPEDITED ACTION

On July 26, 2022, Complainants filed the Complaint asserting that PJM is failing to comply with certain provisions of Section 6 the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. (“Operating Agreement”). The Commission’s notice of the Complaint directed PJM, as the respondent, to file an answer by August 15, 2022. PJM respectfully requests that the Commission extend this deadline by two weeks, until August 29, 2022.

Good cause exists for the modest, two-week extension of time. The Complaint raises serious allegations regarding PJM’s implementation of the Operating Agreement, which the Complaint alleges affects 494 planned transmission projects.³ The Complaint warrants PJM’s careful consideration and response. The requested extension will provide PJM adequate time to prepare its response to the Complaint, and facilitate the development of a robust record on which the Commission can render a decision. In addition, given that the Commission has several Notices of Proposed Rulemakings (“NOPRs”) specific to planning that are currently pending and require responses from PJM by mid- to late-August, the two-week extension will allow PJM more time to consider and respond to the Complaint while managing these other filings.

The central issue of the Complaint—interpretation of the Operating Agreement provisions regarding the issuance of Designated Entity Agreements—has been percolating among PJM and its stakeholders for well over two years. Indeed, PJM has tried to seek

³ Complaint at 3.

clarity on this issue for some time⁴ and continues to discuss the issue with stakeholders. Thus, a modest, two-week extension of time will not prejudice Complainants or any other party to the proceeding or otherwise unduly delay resolution of the issues raised in the Complaint.

PJM respectfully requests that the Commission: (i) waive the ordinary five-day period for answers to this motion since Complainant does not oppose it; and (ii) issue an order as soon as practicable but no later than August 9, 2022. Good cause exists for waiving the answer period and taking expedited action, given that waiving comments and issuing an order by August 9, 2022, will provide PJM and other interested parties with certainty regarding the time allowed to develop responses to the Complaint.

Accordingly, for good cause shown, the Commission should extend the comment deadline for PJM's answer to the Complaint to August 29, 2022. As noted above, PJM is authorized to state that the Complainants do not oppose the requested extension.

II. CONCLUSION

For the reasons stated above, PJM respectfully requests that the Commission (i) grant PJM's request to extend the time to answer the Complaint from August 15, 2022 to August 29, 2022 and (ii) issue an order granting this request no later than August 9, 2022.

⁴ See, e.g., *PJM Interconnection, L.L.C.*, 178 FERC ¶ 61,083 (2022) (rejecting on procedural grounds Operating Agreement revisions regarding the issuance of Designated Entity Agreements).

Respectfully submitted,

/s/ Ryan J. Collins

Paul M. Flynn
Ryan J. Collins
Uju Okasi
WRIGHT & TALISMAN, P.C.
1200 G Street, NW, Suite 600
Washington, DC 20005-3898
202-393-1200 (phone)
202-393-1240 (fax)
flynn@wrightlaw.com
collins@wrightlaw.com
okasi@wrightlaw.com

Craig Glazer
Vice President – Federal Government Policy
PJM Interconnection, L.L.C.
1200 G Street, NW, Suite 600
Washington, DC 20005
202-423-4743 (phone)
202-393-7741 (fax)
craig.glazer@pjm.com

Pauline Foley
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
610-666-8248 (phone)
pauline.foley@pjm.com

August 2, 2022

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 2nd day of August 2022.

/s/ Uju Okasi
Uju Okasi