

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

PJM Interconnection, L.L.C.)	Docket No. ER22-2359-000
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)	

**MOTION FOR EXTENSION OF TIME, SHORTENED ANSWER PERIOD
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 an extension of time, until September 29, 2023, to respond to one aspect of the Commission’s compliance directive set forth in its May 18, 2023 Order on Compliance in the captioned proceeding.² The Commission directed PJM to propose and justify a methodology for ambient-adjusted ratings (“AAR”) implementation, delineating the expected roles and responsibilities between PJM and Transmission Owners (“Delineation of Expected Roles and Responsibilities”). PJM intends to respond to all other aspects of the Commission’s compliance directives by July 17, 2023, as required. PJM is authorized to represent that the Transmission Owners support the extension request on this limited issue as detailed below.

PJM further requests that the Commission waive, or shorten, the answer period for this motion and grant PJM’s extension request as expeditiously as possible, but no later than June 20, 2023. There is good cause for the Commission to approve the requested extension of the current deadline for this single compliance directive, as further detailed below.

¹ 18 C.F.R. §§385.212, 2008(a) (2022).

² *Managing Transmission Line Ratings*, Order No. 881, 177 FERC ¶61,179 (2021), *order addressing arguments raised on reh’g*, Order No. 881-A, 179 FERC ¶61,125 (2022), Order on Compliance Filing, 183 FERC ¶61,117 (2023) (“May 18 Order”).

I. BACKGROUND

On July 12, 2022, PJM submitted proposed revisions to its Tariff in compliance with the requirements of Order No. 881.³ In the May 18 Order on Compliance, the Commission accepted PJM's Compliance filing in part, subject to further compliance.

Among other things,⁴ but as specifically relevant to this motion, the Commission directed PJM to propose a methodology for AAR implementation, with specific delineation of the expected roles and responsibilities between PJM and Transmission Owners.⁵ The Commission directed PJM to submit this proposed methodology within 60 days (July 17, 2023) of the Commission's Order. PJM respectfully requests that the Commission extend the Compliance filing deadline for this single directive to September 29, 2023.

II. MOTION FOR EXTENSION AND REQUEST FOR EXPEDITED ACTION

Good cause exists for the requested extension of time. Following PJM's submission of the July 12, 2022 Compliance Filing, the PJM Transmission Owners have been working to evaluate opportunities to clarify the delineation of the expected roles and responsibilities between PJM and the Transmission Owners, specifically, as they relate to the Consolidated Transmission Owners Agreement, Rate Schedule No. 42, Article 4.11. Although significant progress has been made, more

³ *PJM Interconnection, L.L.C.*, Order No. 881 Compliance filing of PJM Interconnection, L.L.C., Docket No. ER22-2359-000 (July 12, 2022).

⁴ In addition to the limited issue central to this Motion, the Commission also directed PJM to submit a compliance filing within 60 days specific to the following issues: (1) an explanation of PJM's timeline for notifying the Commission of the precise effective date of its Tariff revisions; (2) proposed Tariff revisions to include consideration for the technical limitations of the transmission system in PJM's definition of "Thermal Transmission Facility Rating" and to require that line ratings based on such technical limitations be determined in accordance with a written line rating methodology and consistent with good utility practice, or an explanation why PJM should not be required to do so; (3) proposed Tariff revisions, or, in the alternative, identification of existing Tariff provisions specifying that PJM will use updated AAR as part of any market process associated with day-ahead and real-time markets; and (4) proposed Tariff revisions stating that PJM will make transmission line ratings and methodologies available to any transmission provider upon request, or an explanation why PJM should not be required to do so. *See* Order on Compliance Filing, 183 FERC ¶61,117 at P 10, 15, 22, 53. Additionally, the Commission directed PJM to submit a compliance filing by November 12, 2024, providing an explanation of PJM's timelines for calculating or submitting AARs. *See Id.*, at P 30.

⁵ Order on Compliance Filing, 183 FERC ¶61,117 at P 39.

work is required among the Transmission Owners and further collaboration is needed with PJM before the Transmission Owners can approve and proceed to file any proposed revisions to Article 4.11 of the Consolidated Transmission Owners Agreement. Additional time is necessary for these productive discussions to culminate in proposed revisions for filing. Moreover, once the Transmission Owners are in agreement as to the revisions necessary to satisfy the May 18 Order's compliance directives, the PJM Transmission Owners must provide 30 days' notice prior to the Transmission Owners Agreement Administrative Committee ("TOA-AC") meeting and approving proposed changes before any such proposed revisions can be submitted to the Commission.⁶ Moreover, given the nature and extent of this directive to be addressed, the collaboration required, the 30-day notice requirement to allow for stakeholder input, the scheduling of a special TOA-AC meeting and vacation schedules, PJM seeks an extension to September 29, 2023 to fully respond to this directive.

Good cause exists for waiving the answer period and taking expedited action, as waiving comments and issuing an order by June 20, 2023, will provide PJM, the Transmission Owners and other interested parties with certainty regarding the time allowed to develop a comprehensive proposal for the Delineation of Expected Roles and Responsibilities for AARs in light of other regulatory and timing requirements.

⁶ Consolidated Transmission Owners Agreement, art. 8.5.1.

II. CONCLUSION

For the reasons stated above, PJM respectfully requests that the Commission (i) grant PJM's request to extend the time to submit the Compliance filing on the narrow issue specific to the Delineation of Expected Roles and Responsibilities for AARs, from July 17, 2023, to September 29, 2023; (ii) waive or shorten the five-day period for answers to this motion; and (iii) issue an order as soon as practicable but no later than June 20, 2023.

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 Audubon, Pennsylvania, this 13th day of June 2023.

/s/ Erin Lai
Erin Lai