

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

Energy Management Solutions, L.L.C.

v.

PJM Interconnection, L.L.C.

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Docket No. EL24-90-000

**MOTION FOR EXTENSION OF TIME OF
PJM INTERCONNECTION, L.L.C.**

Pursuant to Rules 206, 212, 213, and 2008 of the Commission’s Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) respectfully requests a 10-day extension of time, i.e., until April 14, 2024, to answer the March 15, 2024 complaint of Energy Management Solutions, LLC (“EMS”) in the captioned proceeding (“Complaint”). EMS stated today that it does not agree to the extension.

Good cause exists for the Commission to grant this Motion. The Complaint includes redacted information that EMS removed for confidentiality reasons; however, PJM believes that this information is important for the Commission’s resolution of this dispute, and PJM intends to submit an answer that includes at least some of the redacted information pursuant to Rule 112 of the Commission’s Rules of Practice and Procedure.² In addition, to fully consider the Complaint, the Commission must have access to, and PJM intends to provide, confidential or privileged market participant information that cannot be publicly disclosed without market participant consent. Before providing this information, PJM must communicate with and obtain the consent of the relevant market participants. This, combined with identifying and protecting the redacted

¹ 18 C.F.R. §§ 385.206, .212, .213, .2008 (2023).

² *Id.* § 385.112.

and privileged information in the Complaint, will require additional time beyond the current 20-day answer period.

For the foregoing reasons, PJM respectfully requests that the Commission grant the extension requested in this Motion and set April 14, 2024, as the deadline for PJM's answer to the Complaint.

Respectfully submitted,

/s/ John Lee Shepherd, Jr.

John Lee Shepherd, Jr.

Blake Grow

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March 25, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have on this day caused to be 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 (2023).

/s/ *Blake Grow*

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