

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

PJM Interconnection, L.L.C.)	
)	Docket No. ER23-1996-000
)	

**ANSWER OF PJM INTERCONNECTION, L.L.C. TO MOTION FOR
EXTENSION OF TIME OF THE ORGANIZATION OF PJM STATES, INC.**

PJM Interconnection, L.L.C. (“PJM”), pursuant to Rule 213 of the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) Rules of Practice and Procedure,¹ submits this limited answer to oppose the Motion for Extension of Time of the Organization of PJM States, Inc. (“OPSI”).² The existing comment deadline of June 9, 2023 is necessary to help the Commission expedite an order on PJM’s filing by July 14, 2023. An expedited order is necessary to help avoid uncertainty as to whether or not there is a Performance Assessment Interval in effect after June 1, 2023 (the requested effective date of the proposed revisions), but before the Commission rules on PJM’s proposal in this proceeding.

I. ANSWER

PJM submitted the proposed revisions to the definition of Emergency Action on May 30, 2023.³ The relatively simple and short filing seeks to amend only the definition of Emergency Action, which was based on a proposal that stakeholders endorsed on May

¹ 18 C.F.R. § 385.213.

² *PJM Interconnection, L.L.C.*, Notice of Intervention and Motion for Extension of Time of the Organization of PJM States, Inc., Docket No. ER23-1996-000 (June 5, 2023) (“OPSI Motion”).

³ *PJM Interconnection, L.L.C.*, Proposed Revisions to Prospectively Refine the Definition of Emergency Action, Request for Shortened Comment Period and Expedited Commission Action, ER23-1996-000 (May 30, 2023) (“PJM’s Filing”).

11, 2023.⁴ In fact, OPSI's letter to the PJM Board specifically raised concerns with the penalty rate and stop loss that was part of a broader proposal that PJM stakeholders endorsed on May 11, 2023. Thus, OPSI was aware of the stakeholder endorsed changes to the definition of Emergency Action since May 11, 2023, and chose to take "no position" on that component in its May 22, 2023 letter to the PJM Board.⁵ It was OPSI's letter, among others, that helped inform PJM's decision to file only the updates to the definition of Emergency Action while omitting the changes related to the penalty rate and stop loss that may be assessed during Performance Assessment Intervals. Further, the PJM Board publically shared its decision that only the Emergency Action component of the stakeholder's proposal would be filed on May 23, 2023.⁶ As a result, the existing June 9, 2023 deadline to comment on PJM's proposed revisions to the definition of Emergency Action provides OPSI, and all other stakeholders, with ample time to file any relevant comments on this relatively straightforward filing.

As noted in PJM's Filing, a shortened comment period is appropriate here to help the Commission expedite an order on PJM's proposed changes to the definition of Emergency Action. An expedited order will help reduce any uncertainty regarding whether there is a Performance Assessment Interval in the event PJM operators employ emergency procedures between now and when the Commission acts on the proposed amendments in this proceeding.

⁴ OPSI, Letter to the PJM Board of Managers (May 22, 2023), available at: <https://www.pjm.com/-/media/about-pjm/who-we-are/public-disclosures/20230522-opsi-letter-re-capacity-performance-penalty-rate-stop-loss-trigger-changes.ashx>.

⁵ *Id.*

⁶ PJM, PJM Board Response to Several Letters Regarding CP Penalty Rate, Stop Loss and Trigger Changes (May 23, 2023), available at: <https://www.pjm.com/-/media/about-pjm/who-we-are/public-disclosures/20230523-pjm-board-response-to-several-letters-regarding-cp-penalty-rate-stop-loss-and-trigger-changes.ashx>.

II. CONCLUSION

Based on the foregoing, PJM requests that the Commission retain the existing comment deadline of June 9, 2023.

Respectfully submitted

/s/ Chenchao Lu

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

Chenchao Lu
Associate General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Norristown, PA, 19403-2429
(610) 666-2255 (phone)
(610) 666-8211 (fax)
chenchao.lu@pjm.com

*Attorney for
PJM Interconnection, L.L.C.*

June 5, 2023

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on each person designated on the service list compiled by the Secretary in these proceedings.

Dated at Audubon, PA this 5th day of June 2023.

Chenchao Lu
Chenchao Lu

Attorney for
PJM Interconnection, L.L.C.