

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

Freeman Solar LLC)	
Complainant,)	
)	
v.)	Docket No. EL24-135-000
)	
PJM Interconnection, L.L.C.)	
Respondent.)	

**JOINT MOTION TO DISMISS COMPLAINT AND STIPULATED
SATISFACTION AGREEMENT OF PJM INTERCONNECTION, L.L.C. AND
FREEMAN SOLAR LLC**

Pursuant to Rule 206(j) of the Federal Energy Regulatory Commission (“Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) and Freeman Solar LLC (“Freeman”) respectfully submit this joint motion to dismiss and stipulated agreement to withdraw the complaint in the captioned proceeding.² PJM and Freeman request that the Commission accept this stipulated agreement without condition and issue an ordering dismissing the Complaint with prejudice. In accordance with Rule 206(j), PJM and Freeman represent that the underlying Complaint will be satisfied through the Commission’s acceptance of the stipulated withdrawal agreement specified below.

I. STIPULATED SATISFACTION AND WITHDRAWAL AGREEMENT

In resolving the Complaint and requesting that the Commission dismiss the Complaint with prejudice, PJM and Freeman agree and stipulate as follows:

- 1) PJM will refund any remaining deposits and payments made by Freeman

¹ 18 C.F.R. § 385.206.

² *Freeman Solar LLC v. PJM Interconnection, L.L.C.*, Complaint and Request for Fast Track Processing of Freeman Solar LLC, Docket No. EL24-135-000 (Aug. 23, 2024) (“Complaint”).

for Transition Cycle #1;

- 2) Freeman will be allowed to submit its reinstated Interconnection Request by application duly submitted by the close of the Transition Cycle #2 application window, which opened on June 21, 2024, and will close on December 17, 2024;
- 3) If the Commission grants this Motion and Freeman meets all the requirements of Part VII of the PJM Open Access Transmission Tariff for applications in Transition Cycle #2, including but not limited to all the forms, information, modeling data, site control evidence and financial security, study deposits, and readiness payments required for projects in Transition Cycle #2, by the application deadline for that cycle, PJM will study Freeman's project in Transition Cycle #2; provided, however, that PJM makes no guarantee of the outcome of that study.

II. CONCLUSION

Based on the stipulated agreement described above, PJM and Freeman request that the Commission accept this stipulation without condition and dismiss the underlying complaint with prejudice. PJM and Freeman also request expedited action on this motion to provide certainty as to the resolution of this proceeding.

Respectfully submitted,

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Counsel to Freeman Solar LLC

Dated: November 4, 2024

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 4th day of November 2024.

/s/ David S. Berman
Attorney for PJM Interconnection, L.L.C.