

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

PJM Interconnection, L.L.C.

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Docket No. RM18-9-000

**MOTION OF PJM INTERCONNECTION, L.L.C.
FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING**

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) hereby moves to extend the deadline to submit its Order No. 2222² compliance filing from July 19, 2021 to February 1, 2022 (the “Motion”).

I. BACKGROUND

In Order No. 2222, the Commission amended its regulations to remove barriers to the participation of distributed energy resource (“DER”) aggregations in the capacity, energy, and ancillary service markets operated by Regional Transmission Organizations and Independent System Operators (“RTOs/ISOs”). As relevant here, the Commission directed PJM to submit its compliance filing by July 19, 2021.³

II. MOTION FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING

Since the issuance of Order No. 2222 in September 2020, PJM and its stakeholders have diligently worked to formulate, analyze, and vet the approaches that PJM will ultimately use to

¹ 18 C.F.R. §§ 385.212, 385.2008 (2021).

² *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, 172 FERC ¶ 61,247 (2020) (“Order No. 2222”).

³ *Id.* at P 360 (“[W]e will require each RTO/ISO to file the tariff changes needed to implement the requirements of this final rule within 270 days of the publication date of this final rule in the *Federal Register*.”). *See also* Notice of Correction in Federal Register of Compliance Deadline, Docket No. RM18-9-000 (Oct. 29, 2020) (“Notice is hereby given that the deadline to submit filings to comply with Order No. 2222 has been corrected and is July 19, 2021.”).

comply with the Order's numerous directives and requirements. This work has primarily occurred through the PJM DER & Inverter-Based Resource Subcommittee ("DIRS").⁴

Coordination between PJM, DER aggregators, distribution utilities, and relevant electric retail regulatory authorities ("RERRAs") is a foundational pillar of Order No. 2222, and a prerequisite for compliance with many of the Order's principle directives. Over the last several months, as PJM has worked with stakeholders through the DIRS, the formidable complexity associated with identifying, reaching consensus on, and effectuating the various components of this coordination has become clearer. While PJM believes that majority consensus can be reached, the significant diversity of electric distribution utilities, RERRAs, and other stakeholders in and among PJM's fourteen distinct state jurisdictions presents both a unique challenge and opportunity for the PJM region.

Accordingly, PJM respectfully requests that the Commission grant an extension of the deadline to submit PJM's Order No. 2222 compliance filing, from July 19, 2021 to February 1, 2022. The Commission is authorized under Rule 2008 to extend "the time by which any person is required or allowed to act under any statute, rule, or order . . . for good cause, upon a motion made before the expiration of the period prescribed or previously extended."⁵ PJM submits that good cause exists in the present circumstances to grant the requested extension.

First, the extension will provide additional time for PJM to engage with DER aggregators, distribution utilities, RERRAs, and other stakeholders to reach majority consensus on the coordination-related aspects of Order No. 2222, and to vet the eventual proposal's conceptual framework and tariff language with these important groups. This additional time is essential.

⁴ More information regarding the DIRS is available here: <https://www.pjm.com/committees-and-groups/subcommittees/dirs>

⁵ 18 C.F.R. § 385.2008.

Given that the Order requires coordination with and among entities that may not be accustomed to directly participating in PJM stakeholder processes, or even directly interfacing with PJM in any capacity,⁶ the scale and complexity of the requisite coordination mandated by Order No. 2222 is in many ways unprecedented in PJM. Accordingly, additional time will help ensure that all impacted stakeholders have an opportunity to participate in the development of PJM's eventual proposal.

Second, because PJM does not anticipate having resources allocated to begin software development work on this specific initiative until fiscal year 2022, the extended deadline to submit PJM's Order No. 2222 compliance filing is not expected to impact the date PJM will propose to effectuate its Order No. 2222 tariff revisions, and therefore is not expected to delay the actual participation of DER aggregators in PJM's markets. Accordingly, granting an extension will not adversely impact entities looking to utilize PJM's Order No. 2222 participation model. To the contrary, the additional time requested by this Motion will help ensure the development of a complete and thoroughly-vetted proposal, thereby minimizing the quantity and extent of additional rounds of compliance filings and, by extension, facilitating the eventual participation of future DER aggregators more quickly.

Third, the Commission has previously found good cause to grant extensions of compliance deadlines for RTOs/ISOs in rulemaking proceedings, specifically when such extensions will

⁶ For example, certain PJM members represent many individual smaller distribution utilities, such as small municipal entities and electric cooperatives. While these smaller entities are not PJM members themselves and do not normally directly interface with PJM, they may nonetheless be impacted by DERs interconnecting to their respective systems to participate in PJM markets through DER aggregations.

permit additional stakeholder engagement.⁷ Granting this Motion is consistent with these prior rulings.

⁷ See, e.g., *Demand Response Compensation in Organized Wholesale Energy Markets*, Notice of Extension of Time, Docket No. RM10-17-000 (Jul. 8, 2011) (“ISO-NE states that the extension of time will allow further consideration by stakeholders of ISO-NE’s proposed tariff changes to its demand response program . . . Upon consideration, notice is hereby given that ISO-NE is granted an extension of time to and including August 19, 2011, to submit its compliance filing pursuant to Order No. 745.”); *Demand Response Compensation in Organized Wholesale Energy Markets*, Notice of Extension of Time, Docket No. RM10-17-000 (Jul. 11, 2011) (“MISO states that the extension of time will allow further discussion and consideration by stakeholders of MISO’s proposed compliance filing . . . Upon consideration, notice is hereby given that MISO is granted an extension of time to and including August 19, 2011, to submit its compliance filing pursuant to Order No. 745.”); *Demand Response Compensation in Organized Wholesale Energy Markets*, Notice of Extension of Time, Docket No. RM10-17-000 (Jul. 22, 2011) (“The NYISO states that additional time is needed to conduct analysis related to issues raised at a July 18th Market Issues Work Group meeting and to respond to any additional stakeholder concerns . . . Upon consideration, notice is hereby given that NYISO is granted an extension of time to and including August 19, 2011, to submit its compliance filing pursuant to Order No. 745.”); *Offer Caps in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Notice of Extension of Time, Docket No. RM16-5-000 (Jul. 17, 2018) (“CAISO asserts that this additional time will also allow for stakeholder consideration and approval from its Board of Governors . . . Upon consideration, notice is hereby given that CAISO’s motion is granted, extending the deadline for CAISO to comply with the Final Rule to and including April 30, 2019.”); *Integration of Variable Energy Resources*, Notice of Extension of Time, Docket No. RM10-11-000 (Oct. 18, 2013) (“CAISO states that the additional time is needed to obtain additional stakeholder input on the proposed revisions to its tariff, and to finalize the supporting materials . . . Upon consideration, CAISO is hereby granted an extension of time, to and including November 27, 2013, to submit a compliance filing.”); *PJM Interconnection, L.L.C.*, Notice of Extension of Time, Docket No. RM10-23-000 (Oct. 15, 2012) (“PJM states that the requested extension will permit PJM sufficient time to finalize the stakeholder process and related compliance activities . . . Upon consideration, notice is hereby given that PJM is granted an extension of time to and including October 25, 2012, to submit its filing to comply with Order No. 1000.”); *Credit Reform in Organized Wholesale Markets*, Notice of Extension of Time, Docket No. RM10-13-000 (Jan. 24, 2012) (“Upon consideration, notice is hereby given that all RTOs and ISOs are granted an extension of time to and including April 30, 2012, to comply with requirement of Order No. 741 that RTOs and ISOs enhance their ability to offset market obligations in bankruptcy.”); *Standardization of Small Interconnection Agreements and Procedures*, Notice of Extension of Time, Docket No. RM02-12-000 (Nov. 4, 2005) (“The motion states that the CAISO requires additional time to incorporate stakeholder input in developing the SGIP and SGIA compliance filings. CAISO further states that the press of the other stakeholder initiatives has delayed the development of a stakeholder process focusing on these SGIP and SGIA compliance filings . . . Upon consideration, notice is hereby given that an extension of time for the CAISO to make SGIP and SGIA compliance filings is granted to and including February 10, 2006, as requested by the CAISO.”).

IV. CONCLUSION

In accordance with the foregoing, PJM respectfully requests that the Commission grant this Motion, and extend the deadline for PJM to submit its Order No. 2222 compliance filing from July 19, 2021 to February 1, 2022.

Respectfully submitted,

/s/ Thomas DeVita

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*On behalf of
PJM Interconnection, L.L.C.*

February 26, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this 26th day of February, 2021 caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Robin Smith

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