

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

PJM Interconnection, L.L.C.

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Docket No. ER19-2722-000

**LIMITED ANSWER AND CLARIFICATION OF
PJM INTERCONNECTION, L.L.C.**

Pursuant to Rule 213 of the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) respectfully submits this Limited Answer and Clarification to the Motion for Extension of Abeyance of the Independent Market Monitor for PJM (the “IMM Motion”)² filed in the above-captioned proceeding on July 31, 2020.

PJM seeks to make two brief clarifications in response to the IMM Motion—the first procedural, the second substantive. First, the IMM Motion states that “PJM requested a shortened comment period, ending on October 12, rather than the usual 60 day comment period which would end on October 31, 2020.”³ This is incorrect on the grounds that: (i) PJM did not request a shortened comment period of any kind in its Federal Power Act (“FPA”) Section 205⁴ filing in Docket No. ER20-2573-000; (ii) the typical comment period in an FPA Section 205 proceeding is twenty-one days, not sixty, and was accordingly established as twenty-one days by the Secretary in Docket No. ER20-2573-000; and (iii) PJM requested a Commission *order* by October 12, 2020, which is *seventy-three days* from the date of filing (July 31, 2020).

¹ 18 C.F.R. § 385.213(a)(3) (2020) (“An answer may be made to any pleading, if not prohibited under paragraph (a)(2) of this section.”).

² *PJM Interconnection, L.L.C.*, Motion for Extension of Abeyance of the Independent Market Monitor for PJM, Docket Nos. ER19-2722-000 and ER20-2573-000 (Jul. 31, 2020).

³ *Id.* at 1.

⁴ 16 U.S.C. § 824d (2018).

Second, with respect to the statement in the IMM Motion that “[i]t is not clear whether PJM is requesting that the Commission rule on the fast start filing prior to the Commission’s review of the July 31st Filing,” PJM can confirm that it did not make any such request, as evidenced by the explicit language in its July 31, 2020 submission in this proceeding:

Today, PJM submitted in Docket No. ER20-2573-000 a Federal Power Act (“FPA”) Section 205 filing proposing revisions to its Tariff and Operating Agreement that, if accepted, will resolve the “pricing and dispatch misalignment issue” identified in the January 23, 2020 Order.

PJM respectfully requests that the Commission accept this Limited Answer and Clarification for consideration.

Respectfully submitted,

/s/ Thomas DeVita

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
Craig.Glazer@pjm.com

Thomas DeVita
Senior Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, PA 19403
(610) 635-3042
Thomas.DeVita@pjm.com

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

August 5, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of August, 2020 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/ Lisa Romani

Lisa Romani

Sr. Paralegal

PJM Interconnection, L.L.C.

2750 Monroe Boulevard

Audubon, PA 19403

610-666-8994

Lisa.Romani@pjm.com