UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C.)	Docket No. ER21-278-000
)	

MOTION FOR EXTENSION OF TIME AND SHORTENED ANSWER PERIOD OF PJM INTERCONNECTION, L.L.C.

PJM Interconnection, L.L.C. ("PJM"), pursuant to Rules 212 and 2008, 18 C.F.R. §§ 385.212, 385.2008, moves for a 39-day extension of time—until March 1, 2021—to submit its responses to the deficiency letter issued by the Commission on December 22, 2020, in these proceedings. PJM also requests a shortened six-day period for answers to this motion, such that responses would be due on Monday, January 18, 2021.

Good cause exists to grant this extension. A number of the issues raised in the deficiency letter relate to implementation details for the Effective Load Carrying Capability ("ELCC") proposal that PJM had planned to finalize with stakeholder input in advance of the requested June 1, 2021 effective date.³ Given that the Commission has now raised these issues for explication in PJM's deficiency response, PJM believes the best approach is to accelerate the stakeholder discussions to inform PJM's responses to the Commission's questions. PJM already has held two stakeholder sessions regarding this deficiency response, and has concluded that several additional sessions, on an appropriately tight schedule, would materially aid and advance PJM's responses to the Commission's

PJM Interconnection, L.L.C., Deficiency Letter, Docket No. ER21-278-000 (Dec. 22, 2020).

PJM has discussed this request for extension with stakeholders both at the January 12, 2021 meeting of the Market Implementation Committee, and the January 8, 2021 meeting of the Capacity Capability Senior Task Force. PJM has not heard any opposition to seeking this extension.

See Effective Load Carrying Capability Construct of PJM Interconnection, L.L.C., Docket No. ER21-278-000, at 18, 61-63 (Oct. 30, 2020) ("October 30 Filing").

questions. The requested 39-day extension will allow PJM to work with stakeholders, obtain feedback on potential responses to the Commission's questions, and facilitate Commission review and acceptance of the ELCC proposal.⁴

For the foregoing reasons, a moderate, 39-day extension of time is justified, and the Commission should extend the deadline for PJM to submit its deficiency letter responses to March 1, 2021. Given that PJM's deficiency response currently is due on January 21, 2021, PJM also asks that the Commission shorten the deadline for answers to this motion to six days, such that any answers would be filed no later than January 18, 2021.

Respectfully submitted,

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January 12, 2021

As PJM explained in its April 27, 2020 notice of intent in Docket Nos. EL19-100 and ER20-584 and the October 30 Filing (at 4), PJM plans to implement ELCC starting with the Base Residual Auction for the 2023/2024 Delivery Year.

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 12th day of January 2021.

/s/ Ryan J. Collins
Ryan J. Collins

Attorney for PJM Interconnection, L.L.C.