UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

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PJM Interconnection, L.L.C.)	Docket No. ER24-462-000
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ANSWER OF PJM INTERCONNECTION, L.L.C. TO THE ILLINOIS COMMERCE COMMISSION'S MOTION FOR EXTENSION OF TIME

PJM Interconnection, L.L.C. ("PJM"), pursuant to Federal Energy Regulatory Commission ("Commission" or "FERC") Rules of Practice and Procedure 213,¹ submits this Answer the Motion of the Illinois Commerce Commission ("ICC") for Extension of Time and Request for Expedited Ruling ("Motion") filed on December 1, 2023.² For the reasons set forth below, the Commission should deny the requested 30-day extension of time, but extend the comment deadline by one week from the current December 12, 2023 date to December 19, 2023.

I. ANSWER

The ICC's Motion for a 30-day extension of time, until January 11, 2024, to submit comments to PJM's section 205 filing in this docket would give the Commission only 11 days to consider any comments and finalize an order before the requested effective date of January 22, 2024. Such a compressed schedule would effectively preclude any meaningful consideration of a potential response by PJM (or any other party) to any comments that are filed. Given that the changes in this filing are proposed to be effective with the 2025/2026 Base Residual Auction that is scheduled to commence in June of 2024, PJM will need to post the planning parameters for this

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¹ 18 C.F.R. §§ 385.213.

² *PJM Interconnection, L.L.C.*, Motion of the Illinois Commerce Commission for Extension of Time and Request for Expedited Ruling, Docket No. ER24-462-000 (Dec. 1, 2023) ("ICC Motion").

auction at the beginning of March, 2024. This timeline necessitates a FERC order by the requested effective date so that PJM has sufficient time to incorporate the proposed revisions into the planning parameters before than are posted.

Notwithstanding the foregoing and upon consultation with counsel from the ICC, PJM and the ICC now support a mutually agreed upon extension of the existing December 12, 2023 comment deadline by one week, until December 19, 2023. This additional time would mean the ICC can be appropriately briefed of this issue at its December 14, 2023 meeting,³ while still affording sufficient time for PJM to respond to any comments that are filed, and for Commission consideration of the record before the requested January 22, 2024 effective date.

II. CONCLUSION

Based on the foregoing, the Commission should deny the ICC's Motion for a 30-day extension of time to the current comment deadline, while extending the comment deadline by an extra week to December 19, 2023.

Respectfully submitted,

<u>/s/ Chenchao Lu</u>

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

³ See ICC Motion at 2.

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 Audubon, PA this 4th day of December 2023.

<u>/s/ Chenchao Lu</u> Chenchao Lu