

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

---

Participation of Distributed Energy	)	Docket No. RM18-9-000
Resource Aggregations in Markets	)	
Operated by Regional Transmission	)	
Organizations and Independent	)	
System Operators	)	

---

**ANSWER OF THE ORGANIZATION OF PJM STATES, INC.  
IN SUPPORT OF MOTION OF PJM INTERCONNECTION, L.L.C.  
FOR EXTENSION OF TIME TO SUBMIT COMPLIANCE FILING**

Pursuant to Rule 213 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, the Organization of PJM States, Inc. (“OPSI”),<sup>1</sup> respectfully submits this answer in support of PJM Interconnection, L.L.C.’s (“PJM”) motion requesting an extension of time<sup>2</sup> to February 1, 2022, to submit an initial compliance filing pursuant to the Commission’s directive in Order No. 2222.<sup>3</sup> On March 1, 2021, OPSI filed a timely doc-less intervention and is therefore a party to this proceeding.

OPSI is a not-for-profit inter-governmental organization of 14 utility regulatory agencies with separate jurisdictions either wholly or partly in the service area of PJM, a Commission-approved regional transmission operator (“RTO”). PJM operates the high-voltage electric transmission grid and wholesale electricity market within its service area. OPSI’s activities

---

<sup>1</sup> Unanimously approved by OPSI Board on March 3, 2021.

<sup>2</sup> Motion of PJM Interconnection, L.L.C. for Extension of Order No. 2222 Initial Compliance Requirement, Docket No. RM18-9-000 (Feb. 26, 2021) (“Motion”).

<sup>3</sup> *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Order No. 2222, 172 FERC ¶ 61,247 (2020) (“Order No. 2222”).

include, but are not limited to, coordinating data or issues analyses and policy formulation related to PJM, its operations, its Independent Market Monitor, and related Commission matters.

## **I. COMMENTS**

On February 26, 2021, PJM filed a Motion requesting the Commission grant an extension of time to February 1, 2022, to submit its initial compliance filing in response to Order No. 2222. The initial compliance filing deadline as the Commission directed in Order No. 2222 is July 19, 2021 and does not provide adequate time for the complex and thorough processes PJM is diligently embarking upon to develop such a compliance filing. Good cause therefore exists for granting the requested extension of time, as further set forth in PJM's Motion and below. With good cause the Commission has legal authority to extend the time as requested in PJM's motion.<sup>4</sup>

OPSI is actively engaged in the process of working with PJM in developing its Order No. 2222 compliance filing. Within that context, OPSI has already identified a number of areas that will require further study, analysis and resolution. As OPSI's primary focus under Order No. 2222 has been on coordination between the RTO/ISO, Aggregator, and Distribution Utility, and the role of relevant electric retail regulatory authorities, the task of complying with the entirety of Order No. 2222 is more substantial than the collection of legitimate and significant challenges identified by OPSI. Ensuring full compliance with Order No. 2222 through complete consideration and resolution of all issues that may arise, including but not limited to by use of PJM's stakeholder process and other collaborations, requires an extension of time as PJM requests in its Motion.

---

<sup>4</sup> Fed. R. Civ. P. 6(b)(1)(A).

## II. CONCLUSION

Wherefore, OPSI respectfully requests that the Commission grant PJM's Motion as requested, and extend the compliance filing deadline in this proceeding to February 1, 2022.

Respectfully Submitted,

/s/ Gregory V. Carmean

Executive Director

Organization of PJM States, Inc.

700 Barksdale Road, – Suite 1

Newark, DE 19711

Tel 302-266-0914

Email: greg@opsi.us

Dated: March 3, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing has been served in accordance with 18 C.F.R. Section 385.2010 upon each person designated on the official service list compiled by the Secretary in this proceeding.

**s/s Gregory V. Carmean**

Executive Director

Organization of PJM States, Inc.

700 Barksdale Road - Suite 1

Newark, DE 19711

Tel: 302-266-0914

Dated at Newark, Delaware this March 3, 2021.