

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

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**Building for the Future Through Electric )  
Regional Transmission Planning and Cost )  
Allocation and Generator Interconnection )**

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**Docket No. RM21-17-000**

**MOTION OF THE ORGANIZATION OF PJM STATES, INC.  
FOR EXTENSION OF TIME TO SUBMIT COMMENTS**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure,<sup>1</sup> the Organization of PJM States, Inc. (“OPSI”),<sup>2</sup> respectfully submits this motion requesting an extension of time to submit initial comments and reply comments in this proceeding. For various reasons explained below OPSI requests the initial comment deadline be extended to December 1, 2021 and the reply comment deadline be extended to January 31, 2022.

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 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.

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<sup>1</sup> 18 C.F.R. § 385.212.

<sup>2</sup> Approved unanimously by OPSI’s Board of Directors on August 19, 2021.

## I. MOTION

On July 15, 2021, the Commission issued an Advance Notice of Proposed Rulemaking (“ANOPR”) for the purpose of improving the current state of regional transmission planning, cost allocation and interconnection processes.<sup>3</sup> Consistent with other pending motions on file,<sup>4</sup> OPSI seeks a 50 day extension to the current deadline for initial comments, from October 12, 2021 to December 1, 2021, as well as a 30 day extension to the current reply comment period, from November 9, 2021 to January 31, 2022. With good cause the Commission has legal authority to extend the time for filing initial and reply comments in this proceeding.<sup>5</sup>

OPSI strongly urges the Commission to grant an extension of time for filing initial and reply comments in this matter. Given the broad scope and potential impact of the ANOPR, the Commission has cause to extend the time for filing initial and reply comments to ensure it develops a more robust record prior to issuing a final order. As explained in the IRC Motion, the ANOPR aims “to explore virtually every aspect of the fundamental pillars of the various RTO/ISO planning and interconnection processes, as well as the fundamental holdings of FERC Order Nos. 2003 and 1000.”<sup>6</sup> Extending the filing deadlines as OPSI and other parties seek will provide valuable time for all parties to contemplate, consider, research, and meaningfully respond to the many important ideas and issues presented in the ANOPR.

The very high volume of questions presented in the ANOPR is in itself cause to extend time to file initial comments, and to extend the time to file reply comments as it is reasonable to

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<sup>3</sup> *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, 176 FERC ¶ 61,024 (2021) (“ANOPR”).

<sup>4</sup> See Motion of the ISO/RTO Council for Extension of Time to Submit Comments, Docket No. RM21-17-000 (August 9, 2021) (“IRC Motion”); see also Organization of MISO States, Inc.’s Motion for Extension of Time to Submit Comments, Docket No. RM21-17-000 (August 19, 2021).

<sup>5</sup> Fed. R. Civ. P. 6(b)(1)(A).

<sup>6</sup> IRC Motion at 3.

expect that initial comments will be lengthy, rife with complex legal and policy arguments, and filed by a large number of parties.

Further, certain parties seeking extension of time consistent with this motion<sup>7</sup> are Commission-approved ISOs or RTOs and are among the most knowledgeable about the current state of their own processes and rules governing transmission planning, cost allocation, and generator interconnection. Given these RTOs' and ISOs' extensive expertise in the areas to be addressed by the ANOPR, the substantively identical pending requests for filing deadline extensions are lent considerable credence.

While OPSI appreciates the Commission's initiative in issuing the ANOPR, and believes the processes targeted are ripe for improvement, any need for swift regulatory action is outweighed by the importance of developing a complete record prior to a Commission ruling. This provides more cause for the Commission to grant an extension of time in this matter.

The issues presented by the ANOPR require substantial time for interested parties to fully develop comments and reply comments in order that the Commission have an adequate record upon which to rule. Should the time for filing comments or reply comments not be extended, OPSI, and likely other interested parties such as Commission-approved ISOs or RTOs, will not be able to provide a full response in initial comments or reply comments and the record will suffer accordingly.

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<sup>7</sup> IRC Motion at n. 2 (listing CAISO, ISO-NE, MISO, NYISO, PJM and SPP as the IRC members joining in the IRC Motion).

## II. CONCLUSION

Wherefore, OPSI respectfully requests that the Commission grant this motion and extend the deadlines for filing initial comments and reply comments in this matter to December 1, 2021 and January 31, 2022, respectively.

Respectfully Submitted,

/s/ Gregory V. Carmean  
Executive Director

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Dated: August 20, 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/ Gregory V. Carmean  
Executive Director  
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Dated at Newark, Delaware this August 20, 2021.