

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

PJM Interconnection, L.L.C.

)

Docket No. ER26-3515-000

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

Pursuant to Rules 212 and 2008 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or the “Commission”),¹ the Organization of PJM States, Inc. (“OPSI”) submits this Motion for an Extension of Time to submit comments in response to PJM’s August 13, 2026, filing proposing revisions to the Open Access Transmission Tariff (“Tariff”) and the Reliability Assurance Agreement Among Load Serving Entities (“RAA”) to establish Interim Resource Adequacy Service (“IRAS”), among other things.² OPSI requests that the Commission extend the time for comments in this docket from September 3, 2026 to September 14, 2026. OPSI requests that the Commission act on this motion by September 1, 2026.³ PJM has authorized OPSI to represent that PJM does not oppose this Motion for Extension of Time.

I. BACKGROUND

On August 13, 2026, PJM filed a proposal to create “a new supplemental capacity product through which New Large Loads [(“NLL”)] provide a load reduction service that is a tool available to PJM to manage resource adequacy shortfalls that would otherwise drive shedding of native loads.”⁴ PJM also proposed to create a new large load registry and meaningful changes to the position of the region’s Variable Resource Requirement (“VRR”) curve, depending on the amount

¹ 18 C.F.R. §§ 385.212 and 385.2008 (“Except as otherwise provided by law, the time by which any person is required or allowed to act under any statute, rule, or order may be extended by the decisional authority for good cause, upon a motion made before the expiration of the period prescribed or previously extended.”).

² *PJM Interconnection L.L.C.*, Proposal to Establish Interim Resource Adequacy Service and a Large Load Registry to Address System Reliability, Docket No. ER26-3515-000 (August 13, 2026) (“IRAS Filing”).

³ The OPSI Board of Directors approved this Motion for Extension of Time pursuant to its Bylaws on August 28, 2026.

⁴ IRAS Filing at 22.

of NLL that has not brought its own new capacity in a delivery year, among other things.⁵ Importantly, PJM proposes a compensation mechanism for loads that provide this new service, which creates new obligations for Electric Distributors. There is also an opportunity for NLLs to waive this compensation, and discussion of ways that states may be able to modify this compensation at the retail level.

II. MOTION FOR EXTENSION OF TIME

Pursuant to the combined notice of filings issued on August 13, 2026, comments on PJM's proposal are due on September 3, 2026.⁶ Good cause exists to extend the comment deadline in this proceeding from September 3, 2026 to September 14, 2026 to allow the retail regulators in the PJM region additional time to consider the complex interaction between the rights and responsibilities of PJM, Electric Distributors, and retail regulators related to the implementation of IRAS and the associated compensation mechanism. OPSI asserts that no party will be prejudiced should FERC grant this motion, nor is this motion made solely for the purpose of delay.

PJM proposes meaningful state-federal interactions in the implementation of the IRAS product itself and the compensation rate for the service. In order to ensure that the retail electric regulators in the PJM region have the opportunity to provide substantive comments, OPSI respectfully requests a limited extension of time to file comments in this docket. Failing to grant the motion would result in rushed reactions to PJM's proposal, which has materially evolved since PJM presented it to stakeholders at the end of June. Granting the extension would, therefore, support the Commission in its decision-making. The issues in this docket are not insignificant. The proposal raises significant questions related to the interaction between wholesale and retail ratemaking.

⁵ *Id.* at 109–119.

⁶ *Combined Notice of Filings #2*, Accession No. 20260813-5118 (FERC Aug. 13, 2026).

III. CONCLUSION

Accordingly, OPSI respectfully requests that the Commission grant this Motion for Extension of Time to respond to PJM's IRAS filing by the close of business on September 14, 2026.

Respectfully Submitted,

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Dated: August 28, 2026

CERTIFICATE OF SERVICE

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

/s/ **Ellen B. Egen**

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Dated at Newark, Delaware this August 28, 2026.