

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

Building for the Future Through Electric	)	
Regional Transmission Planning and	)	Docket No. RM21-17-000
Cost Allocation	)	

**UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME TO FILE
MOTIONS TO GOVERN, REQUEST FOR EXPEDITED CONSIDERATION,
AND WAIVER OF COMMENT PERIOD**

Pursuant to Rules 212 and 2008 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or the “Commission”)¹ and Order No. 1920-A,² the PJM Area Relevant State Entities Committee (“PARSEC”),³ the PJM Transmission Owners,⁴ and PJM Interconnection, L.L.C. (“PJM”) (collectively, the “Joint Movants”), submit this joint motion for an extension to the Engagement Period and deadline for the PJM Transmission Owners to file one or more *ex ante* Long-Term Regional Transmission Cost Allocation Methods in compliance with Order No. 1920. The Joint Movants respectfully request an extension of fifteen days until September 25, 2026, upon which Joint Movants will file motions to govern with the Commission. These motions to govern will propose a schedule for the compliance filings. The requested extensions will permit the PJM Transmission Owners, PARSEC, and PJM to complete their interdependent compliance obligations in a coordinated manner.

Under Rule 2008 of the Commission’s Rules of Practice and Procedure, “the time by which

¹ 18 C.F.R. §§ 385.212 and 385.2008 (2025).

² *Bldg. for the Future Through Elec. Reg’l Transmission Planning & Cost Allocation*, 189 FERC ¶ 61,126, at PP 677-678 (2024) (“Order No. 1920-A”).

³ The PARSEC is a group of Relevant State Entities (“RSEs”) responsible for electric utility regulation or siting electric transmission facilities within the PJM region as defined in Order Nos. 1920 and 1920-A. The PARSEC approved this motion pursuant to its Charter on September 8, 2026.

⁴ See PJM, Open Access Transmission Tariff, § 9, Regulatory Filings. Because the PJM Transmission Owners have Federal Power Act § 205 filing rights over the cost allocation provisions of PJM’s Open Access Transmission Tariff, they are the transmission provider responsible for the compliance filing to amend PJM’s Tariff in accordance with the cost allocation requirements of Order Nos. 1920 and 1920-A.

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.”⁵ In Order No. 1920-A, the Commission set aside its requirement in Order No. 1920⁶ that the Engagement Period between transmission provider(s) and Relevant State Entities (“RSEs”) be limited to six months.⁷ The Commission wrote that when RSEs represent that they need additional time to complete cost allocation discussions, extending the Engagement Period may be appropriate.⁸ Order No. 1920-A also stated that the Commission would, as appropriate, extend cost allocation compliance deadlines to accommodate an extended Engagement Period.⁹ The Commission has previously granted four extensions of the Engagement Period and the cost allocation compliance deadline. The current compliance deadline is September 10, 2026.¹⁰

The PARSEC and the PJM Transmission Owners share the goal of reaching agreement on a single *ex ante* cost allocation structure for Order No. 1920 projects. In its June 11, 2026 Notice of Extension of Time, the Commission made its Dispute Resolution Service available to the parties.¹¹ As indicated in the notice issued by Director of the Dispute Resolution Services on July 10, 2026, and described in the parties Motion for Extension of Time filed August 4, 2026, the parties engaged those services. The engagement process with the assistance of Dispute Resolution Services is active and ongoing and the parties have made significant progress toward a settlement

⁵ 18 C.F.R. § 385.2008.

⁶ *Bldg. for the Future Through Elec. Reg’l Transmission Planning & Cost Allocation*, Order No. 1920, 187 FERC ¶ 61,068 (“Order No. 1920”), *order on reh’g*, Order No. 1920-A, 189 FERC ¶ 61,126 (2024), *order on reh’g*, Order No. 1920-B, 191 FERC ¶ 61,026 (2025).

⁷ Order No. 1920-A at PP 677-678.

⁸ *Id.* P 677.

⁹ *Id.*

¹⁰ *Notice of Extension of Time*, Docket No. RM21-17-000 (Feb. 6, 2025); *Notice of Extension of Time*, Docket No. RM21-17-000 (Oct. 17, 2025); *Notice of Extension of Time*, Docket No. RM21-17-000 (June 11, 2026); *Notice of Extension of Time*, Docket No. RM21-17-000 (Aug. 11, 2026).

¹¹ *Notice of Extension of Time*, Docket No. RM21-17-000 (June 11, 2026).

in principle. However, the parties will be unable to reach agreement and prepare a filing by the current deadline, despite the significant progress that has been made—both the PJM Transmission Owners and the PARSEC still have internal processes that they must complete to approve any agreement. If agreement is reached, the PJM Transmission Owners will also need time to prepare the final compliance filing. Accordingly, the PJM Transmission Owners and the PARSEC believe another extension is necessary to provide time to continue discussions and, if agreement can be reached, to reach agreement. By September 25, 2026, the parties expect that negotiations will have concluded and they will be in a position to propose an updated compliance filing schedule.

Although not party to the DRS negotiations, PJM seeks an extension solely because its remaining compliance obligations are dependent upon the outcome of the PJM Transmission Owners' and PARSEC's ongoing discussions regarding the *ex ante* Long-Term Regional Transmission Cost Allocation Method. Because PJM's corresponding Operating Agreement revisions cannot be finalized until that proposal is complete, PJM requires the additional requested extension to prepare and submit a coordinated compliance filing.

As the PJM Transmission Owners' and PJM's compliance filings in this proceeding are due September 10, 2026, the Joint Movants respectfully request that the Commission enter an order on this motion before September 9, 2026. The Joint Movants are the only interested parties involved in the Engagement Period and filing of the cost allocation. Because they are filing this motion jointly, they request that the Commission treat the motion as unopposed. In the alternative, the Joint Movants request the Commission shorten the answer period to this motion to allow an Order by September 10, 2026. To this end, if the Commission chooses to notice a date for answers, the Joint Movants request that any answers be due on September 9, 2026.

For the reasons stated above, the PARSEC and the PJM Transmission Owners jointly move the Commission to extend the Engagement Period between the PJM Transmission Owners and the PARSEC and the Joint Movants request the Commission likewise extend deadline for compliance filings by the PJM Transmission Owners and PJM to set a deadline of September 25, 2026 for the parties to file motions to govern. The Joint Movants further request that the Commission grant this motion before September 9, 2026, without setting a date for other parties to respond.

Respectfully Submitted,

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Dated: September 8, 2026

CERTIFICATE OF SERVICE

Pursuant to Rule 2010, 18 C.F.R. § 385.2010, I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. on this 8th day of September 2026.

/s/ Jeannette Crooks

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