

questions. The requested 39-day extension will allow PJM to work with stakeholders, obtain feedback on potential responses to the Commission's questions, and facilitate Commission review and acceptance of the ELCC proposal.⁴

For the foregoing reasons, a moderate, 39-day extension of time is justified, and the Commission should extend the deadline for PJM to submit its deficiency letter responses to March 1, 2021. Given that PJM's deficiency response currently is due on January 21, 2021, PJM also asks that the Commission shorten the deadline for answers to this motion to six days, such that any answers would be filed no later than January 18, 2021.

Respectfully submitted,

/s/ Ryan J. Collins

Paul M. Flynn
Ryan J. Collins
Wright & Talisman, P.C.
1200 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 393-1200 (phone)
(202) 393-1240 (fax)
flynn@wrightlaw.com
collins@wrightlaw.com

Craig Glazer
Vice President – Federal Government
Policy
PJM Interconnection, L.L.C.
1200 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 423-4743 (phone)
(202) 393-7741 (fax)
Craig.Glazer@pjm.com

Thomas DeVita
Senior Counsel
PJM Interconnection, L.L.C.
2750 Monroe Blvd.
Audubon, PA 19403
(610) 635-3042 (phone)
(610) 666-8211 (fax)
Thomas.DeVita@pjm.com

Attorneys for PJM Interconnection, L.L.C.

January 12, 2021

⁴ As PJM explained in its April 27, 2020 notice of intent in Docket Nos. EL19-100 and ER20-584 and the October 30 Filing (at 4), PJM plans to implement ELCC starting with the Base Residual Auction for the 2023/2024 Delivery Year.

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 Washington, D.C., this 12th day of January 2021.

/s/ Ryan J. Collins

Ryan J. Collins

**Attorney for
PJM Interconnection, L.L.C.**