

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

XO Energy LLC, et al.	)	Docket No. EL20-41-000
	)	
v.	)	
	)	
PJM Interconnection, L.L.C.	)	

**MOTIONS FOR EXTENSION AND FOR SHORTENED ANSWER PERIOD  
OF THE INDEPENDENT MARKET MONITOR FOR PJM**

Pursuant to Rules 212 and 2008 of the Commission’s Rules and Regulations,<sup>1</sup> Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor (“Market Monitor”) for PJM Interconnection, L.L.C. (“PJM”),<sup>2</sup> respectfully requests an extension of time, until June 1, 2020, for the submission of comments in response to the complaint submitted on April 8, 2020, by XO Energy LLC, together with XO Energy MA, LP and XO Energy MA2, LP, in the above-captioned docket (“Complaint”). The current deadline for the submission of comments is May 1, 2020.<sup>3</sup>

In addition, to facilitate an expeditious decision, the Market Monitor requests that the answer period on this motion be shortened, with any comments due Thursday, April 23, 2020.

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<sup>1</sup> 18 CFR § 385.212 & 385.2008 (2019).

<sup>2</sup> Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff (“OATT”).

<sup>3</sup> See Notice of Complaint, Docket Nos. EL20-41-000 (April 10, 2020).

PJM has indicated to the Market Monitor that it supports the requested extension. Counsel for XO Energy LLC et al. has indicated that the complainants would not oppose an extension of up to 21 days. The Market Monitor believes the requested extension to June 1st is appropriate under the prevailing circumstances.

The Market Monitor requests an extension of time to submit comments because the Complaint includes new examples purporting to illustrate the operation of the FTR Forfeiture Rule. These examples will require more time for adequate consideration and the preparation of a response than the current deadline for an answer permits.<sup>4</sup> The additional time will allow the Market Monitor to submit a more complete filing that will improve the record in this proceeding and facilitate the decision making process. The same is true for other interested parties who will also have the ability to submit more complete filings.

The Commission has recognized that entities have taken steps to protect the health and safety of their employees that may impact the ability to meet regulatory requirements and has announced a policy indicating that it would take appropriate and expeditious action on motions requesting an extension of deadlines.<sup>5</sup>

Good cause exists to support the Market Monitor's request for an extension of the deadline for an answer to the Complaint from Friday, May 1, 2020, to Monday, June 1, 2020, and the request for a shortened answer period on such request.

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<sup>4</sup> OA Schedule 1 § 5.2.1.

<sup>5</sup> Extension of Non-Statutory Deadlines, Docket No. AD20-11-000 (March 19, 2020).

Accordingly, the Market Monitor respectfully requests that the Commission grant the motions.

Respectfully submitted,



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Dated: April 20, 2020

## 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 Eagleville, Pennsylvania,  
this 20<sup>th</sup> day of April, 2020.



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