

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

PJM Interconnection, L.L.C.) Docket No. EL05-121-006

**MOTION OF PJM INTERCONNECTION, L.L.C.
FOR EXPEDITED ACTION GRANTING
AN EXTENSION OF TIME**

PJM Interconnection, L.L.C. (“PJM”) hereby requests a 45-day extension of time to and including April 6, 2010, to submit the information responses required by the Commission’s order establishing paper hearing procedures in this docket.¹ PJM requests expedited action by the Commission on this motion because of the impending due date of February 22 for PJM’s information responses.

PJM requires an extension of time to properly and fully respond to the Commission’s information requests. Among numerous other things, the Commission has asked PJM to estimate the total costs of facilities that operate at or above 500 kV that would be assigned to each transmission pricing zone using PJM’s alternative DFAX methodology that is used for lower voltage cost allocation.² As this analysis requires examination of numerous high-voltage facilities in a manner that has not previously been the cost allocation methodology for these facilities, PJM will have to create new analyses looking back at all such high-voltage facilities that have been allocated in the RTEP process over the past five years. This will be a significant undertaking requiring more

¹ *PJM Interconnection, L.L.C.*, 130 FERC ¶ 61,052 (2010).

² *Id.* at P 10.A.

than the 30 days that the Commission contemplated, necessitating PJM's requesting this extension of time to respond.

PJM understands the need for the Commission not to delay this proceeding. It is requesting the minimum amount of time that it realistically believes will be necessary to complete the tasks that the Commission has assigned to it.

Respectfully submitted,



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