

December 3, 2019

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: PJM Interconnection, L.L.C.: Docket No. EL19-100

Dear Secretary Bose:

On behalf of the Energy Storage Association (“ESA”), please accept this letter in support of the motion filed by PJM Interconnection, L.L.C.’s (“PJM”) to extend, until March 11, 2020, the deadline to submit initial briefs addressing the application of minimum duration requirements as applied to Capacity Storage Resources (PJM’s Motion”) in the above-captioned matter. As detailed in PJM’s Motion, the extension of time will provide an opportunity for PJM to re-engage in a dialogue with energy storage market participants to explore alternative approaches to capacity qualification and resolve or narrow the issues of concern before the Commission commences its full evaluation in this docket.

ESA agrees that continuing its dialogue with PJM will be productive to develop an effective means for energy storage to participate in the capacity market while ensuring just and reasonable rates for PJM’s ratepayers. Accordingly, ESA supports FERC’s granting of PJM’s Motion for Extension of Time to file initial briefs in this matter.

Should you have any questions or concerns regarding this matter, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Andrew O. Kaplan
Andrew O. Kaplan

CERTIFICATE OF SERVICE

I, Anne O'Hanlon, hereby certify that the foregoing Letter in Support of the Energy Storage Association was served via electronic mail to the service list.

Dated in Boston, MA this 3rd. day of December, 2019.



Anne O'Hanlon, Legal Executive Assistant
PIERCE ATWOOD LLP
100 Summer Street
Boston, MA 02110
Phone: 617.488.8123
aohanlon@pierceatwood.com