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

	)	
PJM Interconnection, L.L.C.	)	Docket No. ER15-852-000
	)	

## MOTION IN SUPPORT OF EXTENSION OF TIME OF THE INDEPENDENT MARKET MONITOR FOR PJM

Pursuant to Rule 212 of the Commission's Rules and Regulations,<sup>1</sup> Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM<sup>2</sup> ("Market Monitor"), submits this motion in support of the motion of American Electric Power Service Corporation ("AEP"), et al. for an extension of time for the deadline for comment in the above captioned proceeding from February 4, 2015, to February 13, 2015.<sup>3</sup>

PJM's proposal provides for significant potential changes in the rules governing the role of Demand Response in the PJM market design. The proposal is intended to be compliant with the *EPSA* decision, assuming that *EPSA* is upheld.<sup>4</sup> The Market Monitor shares AEP's concern that PJM's proposed changes for Demand Response are being

2 DIM Interconnection

<sup>&</sup>lt;sup>1</sup> 18 CFR 385.212 (2014).

PJM Interconnection, L.L.C. ("PJM") is a Commission approved Regional Transmission Organization. Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff ("OATT") or the PJM ("OA").

Motion for Extension of Time of the Indicated PJM Utilities Coalition, Docket No. ER15-852-000 (January 26, 2015).

<sup>&</sup>lt;sup>4</sup> Electric Power Supply Ass'n v. FERC, 753 F.3d 216 (D.C. Cir. 2014).

considered simultaneously with other major filings proposing fundamental changes to the RPM market design.<sup>5</sup>

PJM's 1,362 page proposal was not subject to review in prior stakeholder proceedings. This proceeding affords the Market Monitor and other parties the first opportunity to review. The proposal will require time for both technical and legal analysis. The Market Monitor agrees with AEP et al. that the proposal needs to be reviewed in the context of other proposed changes to PJM markets.6 Additional time will allow for the preparation of comments that will be more useful to the Commission in its decision making process.

Accordingly, the Market Monitor respectfully requests that the Commission extend the deadline for comments from February 4, 2015, to February 13, 2015.

Respectfully submitted,

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Dated: January 26, 2015

Id. at 2.

E.g. Dockets Nos. ER15-643, EL15-29.

## **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 26<sup>th</sup> day of January, 2015.

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