

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

Monongahela Power Company and)
Alleghey Energy Supply Company, LLC) Docket No. EC17-88-000
)
)

**ANSWER AND MOTION FOR LEAVE TO ANSWER
OF THE INDEPENDENT MARKET MONITOR FOR PJM**

Pursuant to Rules 212 and 213 of the Commission’s Rules and Regulations,¹ Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM² (“Market Monitor”), submits this answer to the answer submitted by FirstEnergy subsidiaries Monongahela Power Company and Allegheny Energy Supply Company, LLC on August 28, 2017 (“FE”) to the answer filed by the Market Monitor on August 8, 2017. This response is limited to addressing FE’s misunderstanding, including in the testimony of Witness Jay A. Ruberto, of PJM’s rules for replacement capacity, and to thereby ensure an accurate record.³

I. ANSWER

FE states (at 17): “Both the IMM and the CAD mischaracterize PJM’s Capacity Performance rules and misunderstand the risks Mon Power was seeking to manage by acquiring resources in the APS zone.” FE alleges (at 18) that it is trying to manage the risk of

¹ 18 CFR §§ 385.212 & 385.213 (2017).

² Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff (“OATT”) or the PJM Operating Agreement (“OA”).

³ FE at 17–19 & Attachment B (Supplemental Answering Testimony of Jay A. Ruberto) at 4:1–6:6.

the underperformance of a capacity resource during a Performance Assessment Hour with an overperforming resource in the same hour, referring to a PJM FAQ on the locational eligibility of retroactive replacement capacity during performance assessment hours in PJM.⁴

The IMM agrees that the LDAs used in PJM's capacity auction are not the only relevant consideration for defining the pool of potential retroactive replacement resources for specific performance assessment hours, but these LDAs do affect eligibility to be retroactive replacement resources under some conditions. As PJM's response in the FAQ cited by FE states (at 18), the resources that can be used as retroactive replacement capacity for resources that underperform during an emergency event must be in the same location where the emergency event is declared. Witness Ruberto states correctly, in his testimony (at 5: 7-9) that "PJM has the authority to declare a Performance Assessment Hour at the region-wide level as well as at the zonal or sub-zonal level." These market rules, however, do not support FE's argument that a capacity resource in the APS Zone will always qualify to be a retroactive replacement capacity resource for another resource in the APS Zone or even that there is a high probability that this would be the case. If the emergency is region wide, then all resources in the Rest of RTO LDA can be retroactive replacements for a resource in APS Zone. If the emergency is zonal, then only resources in the zone can be retroactive replacements. If the emergency is subzonal (local) then only resources in the same location can be retroactive replacements.

Witness Ruberto also incorrectly asserts that it is better to have a plant in the same zone because overperformance bonuses can be used to offset underperformance penalties. The same issues apply to this argument. Emergency events can be declared at the regional,

⁴ See "Capacity Performance FAQs," PJM Enhanced Liaison Committee (July 31, 2015) <<http://www.pjm.com/-/media/committees-groups/committees/elc/postings/capacity-performance-faqs-7-31-15.ashx?la=en>>.

zonal and subzonal level. The owner of a plant must decide whether to use overperformance, if it exists, as a source of bonus payment dollars or as a source of retroactive replacement MW, but not both.

Witness Ruberto ignores the fundamental risk that the Pleasants facility could be a source of underperformance penalties rather than a source of bonus payments. The Pleasants facility will be required to meet its own capacity performance obligation first, before there are any additional MW available that qualify as bonus performance to be used for retroactive replacement of Mon Power's other underperforming resources.

Witness Ruberto focuses primarily on ex post replacement capacity transactions that occur after specific performance assessment hours but does not address nonemergency replacement capacity transactions. For nonemergency replacement transactions, replacement capacity must be located in the same modeled Locational Deliverability Area (LDA) or the same parent LDA if there are no constraints, meaning there is remaining import capability accounting for all auction results for that delivery year and any approved replacement transactions which affect the remaining import capability. Resources located in a constrained child LDA can serve as replacement capacity for resources located in a parent LDA. The relevant LDA for FE's Monongahela Power is Rest of RTO.

FE incorrectly claims (at 18) that the APS Zone frequently separates as a standalone area for emergency events. In fact, ten of the thirteen historical emergency events that FE provided are incorrectly shown as APS zonal emergency events. The Market Monitor reviewed the details of the thirteen events identified by FE which are publicly available. The events in June 2005 and August 2010 were in a smaller area within the APS Zone. The details of each of the events in June 2005 and August 2010 are in Table 1.⁵ The events in

⁵ All of the data referenced in this filing are publicly available at: PJM, Historical Performance Assessment Hours, accessed at <http://www.pjm.com/-/media/committees-groups/committees/elc/postings/historical-performance-assessment-hours.ashx?la=en>

September 2010, and January 2014, were declared in multiple zones and not in the APS Zone as a standalone emergency. The details of each of the events in September 2010 are in Table 2. The details of each of the events in January 2014 are in Table 3. FE did not include the details of each of the emergency events. Out of the thirteen events that FE provided, the Pleasants resource would not have qualified as a retroactive replacement resource for four of them shown in Table 1. For six of the thirteen events, shown in Table 3, resources in a wider pool than the APS Zone would have qualified as retroactive replacement capacity since the emergency events were declared in a wider area, and are not stand alone APS Zone events. In three events that occurred in September 2010, only resources located in the APS Zone would have qualified as retroactive replacement resources because of PJM's retroactive replacement eligibility rules. In fact, two of the three events declared in September, 2010, overlapped during the same hours on September 23, 2010, from 1 PM to 6 PM in the APS Zone and would have been counted as a single emergency event.

Table 1 shows the local events (Local Load Relief Action, Manual Load Dump Warning) that occurred in June 2005 and August 2010. As the details provided in the 'Message' column show (emphasis added), all of the events declared were in the Doubs area, in the eastern part of the APS Zone, in Maryland.⁶ They are not APS zonal level emergency events. Resources in the APS Zone that are outside the Doubs area would not have been part of the emergency event and would not be eligible to be retroactive replacement capacity for resources in the Doubs area. The Pleasants resource would not have qualified as a retroactive replacement resource for these events because it is not located in the Doubs area of the APS Zone.

⁶ Limekiln and Aqueduct are also in the vicinity of Doubs transformer. As the August 10, 2010, event description states, the areas were considered for load dump for the loss of two of the transformers at Doubs.

Table 2 shows that for the three events in September 2010, PJM declared emergency load management (demand response) events in the BGE and Pepco zones along with the APS Zone. These events were not standalone APS zonal level emergency events. However, since BGE and Pepco are not in the same LDA as APS, resources located in these zones would not have been eligible for retroactive replacement of APS resources for these three events.

Table 3 shows that in January 2014, PJM declared emergency load management (voluntary demand response) events in the entire Mid-Atlantic and Southern regions of PJM along with the APS Zone. These six events were not standalone APS zonal level emergency events. Resources in the Dominion Zone and APS Zone ,which are both in the Rest of RTO LDA, and part of the same emergency event, would have qualified as retroactive replacement resources during these six events.

The data provided by FE do not support the argument that resources need to be procured in the APS Zone and at any location in the APS Zone in order to mitigate Capacity Performance risk. The details of the emergency events that FE provided show that for only three of the thirteen events in the past twelve years, identified by FE, that occurred on two days in September 2010, resources located within the APS Zone alone would be substitutable and eligible as retroactive replacement resources.

Table 1 Local emergency events in APS Zone in June 2005, and August 2010

ID	Message Type	Region Name	Start Time (EPT)	Stop Time (EPT)	Message
32291	Local Load Relief Action (Retired)	FE-AP	Jun 8, 2005 1:23 PM	Jun 8, 2005 2:55 PM	As of 13:23 hours, a Local Load Relief Action of 10 MW in the Doubs area of APS has been issued for Transmission Control.
64475	Manual Load Dump Warning	FE-AP	Aug 9, 2010 1:56 PM	Aug 9, 2010 6:50 PM	As of 13:56 hours, a Manual Load Dump Warning has been issued. Additional Comments: As of 13:56 hours, a Manual Load Dimp Warning of 15 MW in the Doubs area of APS has been issued for Transmission Contingency Control. Additional Comments: Manual load dump warning - for Doubs 500-3 xfmr for I/o Doubs 500-2 and 500-4 xfmr
64494	Manual Load Dump Warning	FE-AP	Aug 10, 2010 2:56 PM	Aug 10, 2010 5:50 PM	As of 14:56 hours, a Manual Load Dump Action of 10 MW has been requested. Total load shed is approx 55 MW. Additional Comments: Limekiln/Aqueduct area of APS has been issued for Transmission Contingency Control. The contingency overload is for the Doubs #3 500/230 kV transformer for the loss of the Doubs #2 and #4 500/230 kV transformers.
64499	Manual Load Dump Warning	FE-AP	Aug 10, 2010 2:56 PM	Aug 10, 2010 9:54 PM	As of 14:56 hours, a Manual Load Dump Warning has been issued. Additional Comments: As of 1456 a Manual Load Dump Warning for 10 MW in the Limekiln/Aqueduct area of APS has been issued for Transmission Contingency Control. The contingency overload is for the Doubs #3 500/230 kV transformer for the loss of the Doubs #2 and #4 500/230 kV transformers.

Table 2 Emergency events in September 2010

ID	Message Type	Region Name	Start Time (EPT)	Stop Time (EPT)	Message
65260	Emerg Mndtry Load Mgmt Long Lead 1-2Hrs (Retired)	FE-AP	Sep 23, 2010 1:00 PM	Sep 23, 2010 7:01 PM	As of 11:00 hours, Active Load Management Long Lead Time has been issued. Load reduction is expected to be fully implemented within 2 hours of this announcement (or at 13:00), and should remain off for 6 hours unless released earlier by PJM. Active Load Management Long Lead Time is in effect for the AP Control Zone(s) only. Additional Comments: For resources located in the West Virginia, Virginia and Maryland portions of the APS zone only.
65261	Emerg Mndtry Load Mgmt Short Lead < 1Hr (Retired)	FE-AP	Sep 23, 2010 12:00 PM	Sep 23, 2010 6:01 PM	As of 11:00 hours, Active Load Management Short Lead Time has been issued. Load reduction is expected to be fully implemented within 1 hour of this announcement (or at 12:00), and should remain off for 6 hours unless released earlier by PJM. Active Load Management Short Lead Time is in effect for the AP Control Zone(s) only. Additional Comments: For resources located in the West Virginia, Virginia and Maryland portions of the APS zone only.
65263	Emerg Mndtry Load Mgmt Long Lead 1-2Hrs (Retired)	BGE	Sep 23, 2010 2:30 PM	Sep 23, 2010 8:01 PM	As of 12:30 hours, Active Load Management Long Lead Time has been issued. Load reduction is expected to be fully implemented within 2 hours of this announcement (or at 14:30), and should remain off for 6 hours unless released earlier by PJM. Active Load Management Long Lead Time is in effect for the BGE Control Zone(s) only.
65281	Emerg Mndtry Load Mgmt Long Lead 1-2Hrs (Retired)	FE-AP	Sep 24, 2010 12:30 PM	Sep 24, 2010 6:30 PM	As of 10:30 hours, Active Load Management Long Lead Time has been issued. Load reduction is expected to be fully implemented within 2 hours of this announcement (or at 12:30), and should remain off for 6 hours unless released earlier by PJM. Active Load Management Long Lead Time is in effect for the AP Control Zone(s) only. Additional Comments: For resources located in the West Virginia, Virginia and Maryland portions of the APS zone only.
65282	Emerg Mndtry Load Mgmt Long Lead 1-2Hrs (Retired)	BGE	Sep 24, 2010 12:30 PM	Sep 24, 2010 6:30 PM	As of 10:30 hours, Active Load Management Long Lead Time has been issued. Load reduction is expected to be fully implemented within 2 hours of this announcement (or at 12:30), and should remain off for 6 hours unless released earlier by PJM. Active Load Management Long Lead Time is in effect for the BGE Control Zone(s) only.
65283	Emerg Mndtry Load Mgmt Long Lead 1-2Hrs (Retired)	PEPCO	Sep 24, 2010 12:30 PM	Sep 24, 2010 6:30 PM	As of 10:30 hours, Active Load Management Long Lead Time has been issued. Load reduction is expected to be fully implemented within 2 hours of this announcement (or at 12:30), and should remain off for 6 hours unless released earlier by PJM. Active Load Management Long Lead Time is in effect for the PEPCO Control Zone(s) only.

Table 3 Emergency events in January 2014

ID	Message Type	RegionName	Start Time (EPT)	Stop Time (EPT)	Message
88045	Emerg Load Mgmt Long Lead Time 1-2 hrs (Retired)	Mid-Atlantic	Jan 23, 2014 6:30 AM	Jan 23, 2014 8:29 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Long Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 2 hours of this Alert Time (or 06:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Long Lead Time is in effect for the Mid-Atlantic Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO
88046	Emerg Load Mgmt Long Lead Time 1-2 hrs (Retired)	DOM	Jan 23, 2014 6:30 AM	Jan 23, 2014 8:29 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Long Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 2 hours of this Alert Time (or 06:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Long Lead Time is in effect for the Dominion Control Zone(s) only.
88047	Emerg Load Mgmt Long Lead Time 1-2 hrs (Retired)	FE-AP	Jan 23, 2014 6:30 AM	Jan 23, 2014 8:29 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Long Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 2 hours of this Alert Time (or 06:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Long Lead Time is in effect for the AP Control Zone(s) only. Additional Comments: FE-SOUTH
88049	Emerg Load Mgmt Short Lead Time < 1Hr (Retired)	DOM	Jan 23, 2014 5:30 AM	Jan 23, 2014 8:29 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Short Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 1 hour of this Alert Time (or 05:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Short Lead Time is in effect for the Dominion Control Zone(s) only.
88050	Emerg Load Mgmt Short Lead Time < 1Hr (Retired)	FE-AP	Jan 23, 2014 5:30 AM	Jan 23, 2014 8:29 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Short Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 1 hour of this Alert Time (or 05:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Short Lead Time is in effect for the AP Control Zone(s) only. Additional Comments: FE-SOUTH
88052	Emerg Load Mgmt Short Lead Time < 1Hr (Retired)	MIDATL	Jan 23, 2014 5:30 AM	Jan 23, 2014 8:29 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Short Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 1 hour of this Alert Time (or 05:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Short Lead Time is in effect for the Mid-Atlantic Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO
88062	Emerg Load Mgmt Long Lead Time 1-2 hrs (Retired)	FE-AP	Jan 23, 2014 4:00 PM	Jan 23, 2014 7:00 PM	As of 14:00 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Long Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 2 hours of this Alert Time (or 16:00) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Long Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM and APS

88062	Emerg Load Mgmt Long Lead Time 1-2 hrs (Retired)	MIDATL	Jan 23, 2014 4:00 PM	Jan 23, 2014 7:00 PM	As of 14:00 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Long Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 2 hours of this Alert Time (or 16:00) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Long Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM and APS
88062	Emerg Load Mgmt Long Lead Time 1-2 hrs (Retired)	DOM	Jan 23, 2014 4:00 PM	Jan 23, 2014 7:00 PM	As of 14:00 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Long Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 2 hours of this Alert Time (or 16:00) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Long Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM and APS
88063	Emerg Load Mgmt Short Lead Time < 1Hr (Retired)	FE-AP	Jan 23, 2014 3:00 PM	Jan 23, 2014 7:00 PM	As of 14:00 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Short Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 1 hour of this Alert Time (or 15:00) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Short Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM, APS
88063	Emerg Load Mgmt Short Lead Time < 1Hr (Retired)	DOM	Jan 23, 2014 3:00 PM	Jan 23, 2014 7:00 PM	As of 14:00 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Short Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 1 hour of this Alert Time (or 15:00) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Short Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM, APS
88063	Emerg Load Mgmt Short Lead Time < 1Hr (Retired)	MIDATL	Jan 23, 2014 3:00 PM	Jan 23, 2014 7:00 PM	As of 14:00 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Short Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 1 hour of this Alert Time (or 15:00) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Short Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM, APS
88105	Emerg Load Mgmt Long Lead Time 1-2 hrs (Retired)	DOM	Jan 24, 2014 6:30 AM	Jan 24, 2014 8:45 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Long Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 2 hours of this Alert Time (or 06:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Long Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM and APS
88105	Emerg Load Mgmt Long Lead Time 1-2 hrs (Retired)	MIDATL	Jan 24, 2014 6:30 AM	Jan 24, 2014 8:45 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Long Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 2 hours of this Alert Time (or 06:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Long Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM and APS

88105	Emerg Load Mgmt Long Lead Time 1-2 hrs (Retired)	FE-AP	Jan 24, 2014 6:30 AM	Jan 24, 2014 8:45 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Long Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 2 hours of this Alert Time (or 06:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Long Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM and APS
88106	Emerg Load Mgmt Short Lead Time < 1Hr (Retired)	MIDATL	Jan 24, 2014 5:30 AM	Jan 24, 2014 8:45 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Short Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 1 hour of this Alert Time (or 05:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Short Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM and APS
88106	Emerg Load Mgmt Short Lead Time < 1Hr (Retired)	FE-AP	Jan 24, 2014 5:30 AM	Jan 24, 2014 8:45 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Short Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 1 hour of this Alert Time (or 05:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Short Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM and APS
88106	Emerg Load Mgmt Short Lead Time < 1Hr (Retired)	DOM	Jan 24, 2014 5:30 AM	Jan 24, 2014 8:45 AM	As of 04:30 hours (Alert Time), a NERC level EEA2 and Emergency Load Management with Short Lead Time has been issued for resources that can provide load reduction. Load reduction is expected to be fully implemented within 1 hour of this Alert Time (or 05:30) and should remain off for 6 hours unless released earlier by PJM. Resources that require 2 hour shutdown may continue load reduction for up to 2 hours, if PJM releases early. Emergency Load Management with Short Lead Time is in effect for the following Control Zone(s) only. Additional Comments: AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG, RECO, DOM and APS

II. MOTION FOR LEAVE TO ANSWER

The Commission's Rules of Practice and Procedure, 18 CFR § 385.213(a)(2), do not permit answers to answers or protests unless otherwise ordered by the decisional authority. The Commission has made exceptions, however, where an answer clarifies the issues or assists in creating a complete record.⁷ In this answer, the Market Monitor provides the Commission with information useful to the Commission's decision-making process and which provides a more complete record. Accordingly, the Market Monitor respectfully requests that this answer be permitted.

⁷ See, e.g., *PJM Interconnection, L.L.C.*, 119 FERC ¶ 61,318 at P 36 (2007) (accepted answer to answer that "provided information that assisted ... decision-making process"); *California Independent System Operator Corporation*, 110 FERC ¶ 61,007 (2005) (answer to answer permitted to assist Commission in decision-making process); *New Power Company v. PJM Interconnection, L.L.C.*, 98 FERC ¶ 61,208 (2002) (answer accepted to provide new factual and legal material to assist the Commission in decision-making process); *N.Y. Independent System Operator, Inc.*, 121 FERC ¶61,112 at P 4 (2007) (answer to protest accepted because it provided information that assisted the Commission in its decision-making process).

III. CONCLUSION

The Market Monitor respectfully requests that the Commission afford due consideration to this answer as the Commission resolves the issues raised in this proceeding.

Respectfully submitted,



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Dated: September 12, 2017

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 12th day of September, 2017.



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