

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

Jackson Generation LLC)	
)	
)	Docket No. EL21-82-000
v.)	
)	
PJM Interconnection, L.L.C.)	
)	
)	

COMMENTS OF THE INDEPENDENT MARKET MONITOR FOR PJM

Pursuant to Rule 211 of the Commission’s Rules and Regulations,¹ Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor (“Market Monitor”) for PJM Interconnection, L.L.C. (“PJM”),² submits these comments responding to the complaint filed June, 9, 2021, by Jackson Generation LLC (“Jackson”) against PJM (“Complaint”). The Complaint requests that the Commission find that PJM failed to file a report under Section 6.2(c) of Attachment DD to the OATT concerning certain determinations. The Complaint has no merit and should be rejected.

Section 6.2(c) provides:

Within seven days after the deadline for submission of Sell Offers in a Base Residual Auction or Incremental Auction, the Office of the Interconnection shall file with FERC a report of any determination made pursuant to Tariff, Attachment DD, section 5.14(h), Tariff, Attachment DD, section 6.5(a)(ii), or Tariff, Attachment DD, section 6.7(c) identified in such sections as subject

¹ 18 CFR § 385.211 (2020).

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

to the procedures of this section. Such report shall list each such determination, the information considered in making each such determination, and an explanation of each such determination. Any entity that objects to any such determination may file a written objection with FERC no later than seven days after the filing of the report. Any such objection must not merely allege that the determination was in error, and must provide support for the objection, demonstrating that the determination overlooked or failed to consider relevant evidence. In the event that no objection is filed, the determination shall be final. In the event that an objection is filed, FERC shall issue any decision modifying the determination no later than 60 days after the filing of such report; otherwise, the determination shall be final. Final auction results shall reflect any decision made by FERC regarding the report.

The current language in the indicated provisions (Attachment DD §§ 5.14(h), 6.5(a)(ii) & 6.7(c)) does not provide for determinations by PJM under Section 6.2(c). The language in Section 6.2(c) has become superfluous and should be removed.

Therefore, the Complaint has no merit and should be rejected.

The Market Monitor makes determinations on market power under Attachment M and Attachment M–Appendix. Section 6.2(c) makes no reference to these provisions. Such determinations on market power provide advance notice to sellers of the Market Monitor’s position on the level of an offer, but such determinations do not prevent a seller from submitting the offer it chooses and takes sole responsibility for.³

Therefore, the Complaint has no merit and should be rejected.

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

³ See OATT § 12A.

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Respectfully submitted,



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Dated: June 29, 2021

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 29th day of June, 2021.



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