UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Big Plain Solar, LLC	))))	Docket Nos. EL23-78-000, ER23-1736-000

MOTION FOR REJECTION OF THE INDEPENDENT MARKET MONITOR FOR PJM

Pursuant to Rule 212 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"), respectfully moves to reject the filing that initiated this proceeding. The filing should be rejected because it is incomplete. Rejection should be without prejudice to the Big Plain Solar, LLC ("Big Plain"), submitting a complete filing in a new proceeding.

This proceeding concerns a filing with the Commission for approval of a rate schedule for compensation for reactive capability under Schedule 2 to the Open Access Transmission Tariff ("Schedule 2"). Schedule 2 makes no provision for PJM, the administrator of the Tariff, to evaluate such Schedule 2 filings prior to filing. Determinations of eligibility to file under Schedule 2 and the information that must be submitted are left entirely to the Commission.[2]

The Commission has repeatedly determined that the following information must be included in a Schedule 2 filing, and has rejected filings that fail to include it:

---

1 18 CFR § 385.212 (2023).

2 *See, e.g., Whitetail Solar 3, LLC, et al.*, Opinion No.583, 184 FERC ¶ 61,145 at P 2 (2023) ("In the Initial Decision, the Presiding Judge concluded that none of the four Facilities are eligible to receive compensation under Schedule 2. As discussed below, we affirm the Initial Decision.").

1. [T]he latest reactive power output test data and reports, including the PJM Reactive Capability Testing Form Sheet 1 and 2;
2. the NERC MOD-025-2 report; and
3. (the PJM accepted eDART data and corresponding graph of MVAR output versus the time of the test for the facility.[3]

Big Plain has not submitted the required information in support of its filing on April 27, 2023. The resulting record is deficient and does not provide a valid basis for the Commission to approve a proposed rate schedule, including a rate schedule proposed in an offer of settlement.[4] As the Commission explained in *Riverstart*, a proposed rate schedule not

---

[3] *See Riverstart Solar Park LLC*, 185 FERC ¶ 61,101 at P 23 (2023); *Yellowbud Solar, LLC*, 185 FERC ¶ 61,216 at P 21 (2023); *Bishop Hill Energy LLC*, 181 FERC ¶ 61,003, at PP 11-14 (2022), *order on reh'g*, 185 FERC ¶ 61,056; *Covanta Del. Valley, L.P.*, 180 FERC ¶ 61,155 at PP 17, 22–24 (2022); *Blooming Grove Wind Energy Center LLC*, 181 FERC ¶ 61,109 (2022); *Flemington Solar, LLC*, 182 FERC ¶ 61,110, at P 21 (2023); *Skipjack Solar Center, LLC*, 182 FERC ¶ 61,146 at P 11 (2023); *see also Middletown Coke*, 178 FERC ¶ 61,183 at P 10 (2022); *Paulding Wind Farm IV LLC*, 173 FERC ¶ 61,172 at P 6 (2020); *NedPower Mount Storm, LLC*, 173 FERC ¶ 61,177 at PP 9-10 (2020); *Wabash Valley Power Ass'n, Inc.*, 154 FERC ¶ 61,245 at P 29 (2016).

[4] See 185 FERC ¶ 61,101 at PP 21–23 ("In *Wabash*, the Commission provided general guidance on establishing or revising cost-based rates for reactive service based on the AEP-methodology 'to ensure that the Commission has sufficient information to evaluate whether the reactive power rate is just and reasonable.' Among other things, the Commission explained that the revenue requirements established pursuant to Schedule 2 of the pro forma Open Access Transmission Tariff (OATT) 'are based on a particular level of reactive power capability for a particular generating unit or group of units.' The Commission also indicated that to satisfy its reactive filing requirements, applicants proposing a cost-based rate based on the AEP-methodology must include with their reactive power revenue requirement filings reactive power test reports to support the proposed reactive power allocator used in the AEP-methodology. Soon after Wabash, the Commission clarified that '[t]o support their capability figures, generator owners should provide the most recent Reactive Service test reports produced in compliance with Standard MOD-025-2 adopted by the North American Electric Reliability Corporation."[footnote omitted]

The reactive power allocator referred to in *Wabash* plays a significant role in determining a facility's overall reactive power compensation under the AEP-methodology. Under the AEP-methodology, the relevant groups of production power plant investment involve both reactive and real power, and so an allocation factor is developed to sort the annual revenue requirements of facility components between real and reactive power production.[footnote omitted] More specifically, the 'reactive power allocator'—based on the ratio of $MVAR^2$ to MVA^2, which translates algebraically into 1 – (power factor)^2—is applied to the amount of generator-exciter investment, generator step up transformers

supported by the required information does not meet the burden of proof.[5] An offer of settlement based on an incomplete record was filed in this proceeding on January 8, 2024, and the Market Monitor filed comments in opposition to such offer on January 29, 2024.

Uniform, just and reasonable, and not unduly discriminatory requirements for filings under Schedule 2 should be enforced. The incomplete filing that initiated this proceeding should be rejected without prejudice to Big Plain submitting a new and supported filing.

Accordingly, the Market Monitor respectfully requests that the Commission grant this motion.

Respectfully submitted,

Joseph E. Bowring
Independent Market Monitor for PJM
President
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8051
joseph.bowring@monitoringanalytics.com

Jeffrey W. Mayes

General Counsel
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8053
jeffrey.mayes@monitoringanalytics.com

Dated: January 29, 2024

---

investment, and accessory electric equipment investment,[footnote omitted] which for many facilities can be substantial.[footnote omitted] A facility's reactive power compensation therefore depends heavily on its reactive allocator, and thus, in turn, on its power factor, which is the revenue requirement calculation component that reactive power test information is used to support.[footnote omitted]

Also since *Wabash*, the Commission has continued to see an increasing number of filings by generators seeking reactive power compensation under the AEP-methodology. In its consideration of such cases, the Commission has applied its corresponding increased expertise in this area, such that it has identified particular data and test reports that are necessary to analyze and evaluate an applicant's reactive power revenue requirement, including proposed reactive power allocators.").

[5] 185 FERC ¶ 61,101 at P 23.

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 January, 2024.

Jeffrey W. Mayes
General Counsel
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8053
jeffrey.mayes@monitoringanalytics.com