

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C.

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Docket No. ER09-1063-004

**MOTION FOR EXTENSION OF TIME OF THE
INDEPENDENT MARKET MONITOR FOR PJM**

Pursuant to Rule 212 of the Commission’s Rules and Regulations, 18 CFR § 385.212 (2010), Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM (“Market Monitor”), submits this motion for extension of time both for itself and for intervenors other than itself to respond in the above captioned proceeding.¹ The implementation of revised scarcity pricing rules is an important step towards achievement of a fully developed and coherent market design in the PJM Region, and additional time is needed for adequate consideration of the merits of both PJM’s and the Market Monitor’s alternative approaches to achieve compliance with the applicable directive in Order No. 719.²

¹ PJM Interconnection, L.L.C. is a Commission-approved Regional Transmission Organization. Capitalized terms used herein and not otherwise defined have the meaning specified in the PJM Open Access Transmission Tariff (“Tariff”).

² *Wholesale Competition in Regions with Organized Electric Markets*, Order No. 719, FERC Stats. & Regs. ¶31,281 at P 194 (2008) (“Order No. 719”), *order on reh’g*, Order No. 719-A, FERC Stats. & Regs. ¶31,292 (2009), *reh’g denied*, Order No. 719-B, 129 FERC ¶ 61,252 (2009); *PJM Interconnection, L.L.C.*, 129 FERC ¶61,250 (2009).

On June 18, 2010, PJM submitted a filing proposing certain revisions to its OATT for pricing during operating reserve shortages in the PJM Region (“PJM Proposal”).³ The Commission set an initial comment date of July 9, 2010.⁴ Although PJM, the Market Monitor and most stakeholders have achieved a consensus on the fundamental approach to reform scarcity pricing, the Market Monitor, and numerous stakeholders have serious concerns that major components of PJM’s proposal are not consistent with the overall design of PJM markets and are otherwise not just and reasonable. The Market Monitor has developed a comprehensive alternative proposal to compliance that corrects these flaws while remaining consistent with stakeholders’ preferred fundamental approach reflected in both PJM’s and the Market Monitor’s proposals. The Market Monitor’s approach obtained broad support among stakeholders, but, as was the case with PJM’s proposal, it did not obtain the supermajority of votes required for amendments to the PJM Operating Agreement.⁵

In order to permit adequate consideration of both PJM’s and the Market Monitor’s approaches to the incorporation of revised scarcity pricing provisions, the Market Monitor asks for one additional week to submit its response and alternative proposal, which would establish a due date of July 16, 2010 for the Market Monitor. In order to provide ample opportunity for intervenors to evaluate both proposals, the Market Monitor requests an

³ PJM Compliance Filing in Docket No. ER09-1063-004 (June 18, 2010) (“June 18th Filing”).

⁴ Combined Notice of Filings # 1 (June 21, 2010).

⁵ June 18th Filing at 7–8.

additional two weeks (a total of three additional weeks) for intervenors to respond to both PJM's and the Market Monitor's proposals, which would establish a due date of July 30, 2010 for intervenors other than the Market Monitor. If adopted, this would allow full opportunity to be heard and an orderly development of the record, as has been demonstrated by the application of this process at an earlier stage of this proceeding.⁶

Accordingly, the Market Monitor respectfully requests that the Commission grant this motion for an extension to July 16, 2010 for the Market Monitor and to July 30, 2010 for intervenors other than the Market Monitor, in order to afford due consideration of both PJM's proposal and the Market Monitor's alternative proposal.

Respectfully submitted,



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Dated: June 22, 2010

⁶ See *PJM Interconnection, L.L.C.*, Notice of Extension of Time in ER09-1063-000, -001 (May 20, 2009).

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 22nd day of June, 2010.



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