

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

PJM Interconnection, L.L.C.)) Docket No. ER11-2875-003
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))

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 for PJM² ("Market Monitor"), submits these comments on the filing in this proceeding by PJM Interconnection, L.L.C. ("PJM") on December 19, 2011 ("December 19th Filing") in response to the Commission's order of November 17, 2011,³ in the above referenced proceeding ("November 17th Order").

It appears that the December 19th Filing did not incorporate in the attached tariff sheets a revision that PJM intended to include in order to comply with the Commission's direction that the Minimum Offer Price Rule⁴ ("MOPR") applies to a capacity resource, whether existing or planned, until it clears an RPM Auction on the basis of a compliant offer.⁵ PJM indicates (at 4-5) that it intended to comply with this directive by deleting the

¹ 18 CFR § 385.211 (2011).

² Capitalized terms herein are not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff ("OATT").

³ *PJM Interconnection, L.L.C.*, 137 FERC ¶61,145.

⁴ OATT Attachment DD § 5.14(h).

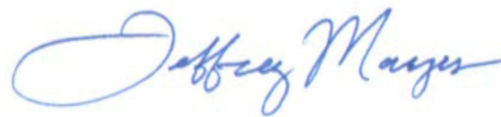
⁵ November 17th Order at PP 128, 256.

word "Planned" from "Planned Generation Capacity Resource" in Section 5.14(h)(4) of Attachment DD to the OATT. The attached tariff sheets, however, do not delete "Planned." The attached sheets also include "Planned" in new language intended to ensure that the MOPR applies to external resources dedicated to PJM. This reference to "Planned" should also be deleted. No resource should be able to avoid the MOPR simply because its status changes from "planned" to "existing" when interconnection service commences.

Accordingly, the Market Monitor requests that the Commission require PJM to submit corrected tariff sheets removing both references to "Planned" in the proposed revised Section 5.14(h)(4).

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

Respectfully submitted,



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Dated: January 9, 2012

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 9th day of January, 2012.



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