

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

FirstEnergy Solutions Corp.)	Docket No. EL13-47-001
Allegheny Energy Supply Company, LLC,)	
)	
v.)	
)	
PJM Interconnection, L.L.C.)	
)	

ANSWER 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 this answer and motion for leave to answer to the pleading submitted by J. Aron & Company (“J. Aron”) in the indicated proceeding on December 18, 2014. J. Aron asserts that the filing provides new factual information for the Commission supporting its request for rehearing of the Commission’s order issued June 5, 2013 (“June 5th Order”), but the pleading instead repeats prior arguments, rejected by the Commission.³ J. Aron fails to demonstrate that it has new information and does not explain how granting

¹ 18 CFR §§ 385.211 (2014).

² PJM Interconnection, L.L.C. is a FERC-approved Regional Transmission Organization. Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff (“OATT”).

³ This is the second such pleading that J. Aron has filed for the attention of the other parties over the holidays. *See* Motion of J. Aron & Company for Leave to Submit Limited Factual Pleading, Docket No. EL13-47-001 (December 17, 2013).

its motion would assist resolution of this proceeding. Continuance of this proceeding instead impedes progress towards appropriate resolution of FTR funding issues in PJM.

J. Aron's motion should be denied and the pending petitions for rehearing should be denied.⁴ The Commission has acted properly and decisively to protect the markets from a faulty approach to addressing FTR funding issues, finding that FirstEnergy does not demonstrate "why all transmission customers, who already pay for access to the transmission system, should pay for underfunding."⁵

When this matter is closed, the Market Monitor plans to file an actionable pleading that includes the eight solutions recommended by the Market Monitor and others in its prior pleadings.⁶ These solutions have significant stakeholder support,⁷ and would improve the efficiency of FTR markets and the PJM market design.

The Market Monitor limits this response to J. Aron's motion. J. Aron's motion also included arguments for rehearing and an Affidavit of Harry Singh. Should the Market Monitor determine that a response to those arguments and the Affidavit would be useful, the Market Monitor plans to move for submission of and to submit a responsive pleading by January 30, 2014.

⁴ Request for Rehearing and Reconsideration of the FirstEnergy Companies; Request for Rehearing of J. Aron & Company; Request for Rehearing of DC Energy, LLC and Vitol, Inc.; Request for Rehearing of the PSEG Companies; all filed in Docket No. ER13-47-001 on July 5, 2013.

⁵ *FirstEnergy Solutions Corp., et al. v. PJM Interconnection, L.L.C.*, 143 FERC ¶ 61,209 at P 43 (2013).

⁶ See Answer and Motion for Leave to Answer of the Independent Market Monitor for PJM, Docket No. EL13-47-001 (January 16, 2014) at 7–8; Answer and Motion for Leave to Answer of the Independent Market Monitor for PJM, Docket No. EL13-47-000 (April 18, 2013) at 7–10 ("April 18th Answer"); J. Aron at 11 & n.23; Request for Rehearing of DC Energy, LLC and Vitol Inc., Docket No. EL13-47-000 (July 5, 2013) at 3; Request for Rehearing of the PSEG Companies, Docket No. EL13-47-000 (July 5, 2013) *passim*.

⁷ See, e.g., Motion for Leave to Answer and Answer of the FirstEnergy Companies, EL13-47-00 at 15 (March 29, 2013), Motion to Intervene and Comments of the PSEG Companies, EL13-47-000 (March 18, 2013).

Accordingly, the Market Monitor respectfully requests that the Commission deny J. Aron's motion and deny the pending requests for rehearing.

Respectfully submitted,



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Dated: December 31, 2014

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 31st day of December, 2014.



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