

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

Old Dominion Electric Cooperative

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Docket No. ER14-2242

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

Pursuant to Rule 212 and 2008 of the Commission's Rules and Regulations,<sup>1</sup> Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM<sup>2</sup> ("Market Monitor"), respectfully moves for an extension of time, until August 11, 2014, for the submission of comments in response to the request for waivers of PJM market rules of Old Dominion Electric Cooperative ("ODEC"), submitted in the above captioned docket. The current deadline for the submission of comments is July 14, 2014.<sup>3</sup>

The Market Monitor requests an extension of time of four weeks to submit comments because ODEC's filing in this docket raises complicated issues and a series of case specific representations of its communications and activities on cold weather days that occurred earlier this year. The ODEC submittal requires more time for adequate consideration and analysis than the current deadline for comment affords. This is the third filing in recent weeks requesting waivers or other relief in relation to losses on gas costs.<sup>4</sup> Experience with those prior filings has shown the need to thoroughly investigate the facts

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<sup>1</sup> 18 CFR § 385.212 & 385.2008 (2013).

<sup>2</sup> Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff ("OATT").

<sup>3</sup> See Combined Notice of Filings #1 (June 23, 2014).

<sup>4</sup> See *Duke Energy Corporation, et al.*, Docket No. EL14-45; *Eagle Point Power Generation, LLC*, Docket No. ER14-2075.

represented. In this case, ODEC outlines multiple descriptions of its interactions with PJM and other third parties, and requests recovery in multiple scenarios and under multiple theories of recovery. Good cause exists to afford adequate time for an evaluation of material that took several months to prepare.

An extension of the comment period by four weeks would yield a comment deadline of August 11, 2014. That additional time would allow the Market Monitor and other parties to submit more complete filings that will improve the record in this proceeding. If the issues are clearly framed and/or addressed in the pleadings at the outset of this proceeding, it may avoid the need for additional process later.

Accordingly, for good cause shown, the Market Monitor respectfully requests that the Commission grant this motion for extension.

Respectfully submitted,



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Dated: June 27, 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 27<sup>th</sup> day of June, 2014.



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