UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

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PJM Interconnection, L.L.C.)	Docket No. ER16-561-000
)	

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 responding to the filing submitted by PJM Interconnection, L.L.C. ("PJM") on December 18, 2015, proposing to fund the Consumer Advocates of PJM States, Inc. (CAPS), a non-profit organization formed to coordinate the participation of State Consumer Advocate offices in the PJM stakeholder process ("CAPS Filing"). The Market Monitor strongly supports funding CAPS and urges that the proposal be approved.

The proposal to fund CAPS is a meaningful first step to obtain needed balance in the PJM stakeholder process. To date PJM consumers have been systematically underrepresented. State consumer advocates have limited resources and must devote a significant portion of available resources to state issues. Meaningful participation in the PJM stakeholder process requires regular participation in a heavy schedule of meetings.

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¹ 18 CFR § 385.211 (2015).

Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff ("OATT"), the PJM Operating Agreement ("OA") or the PJM Reliability Assurance Agreement ("RAA").

Effective representation of consumer interests is needed at all stages of the stakeholder process, as the technical details of proposed rules can have a significant impact on how the markets operate. Customer representatives should have the resources to attend meetings about PJM markets, services and issues relevant to customers' interests.

The requirement in Order No. 2000 that a Regional Transmission Organization (RTO) "have a decision-making process that is independent of control by any market participant or class of participants" will be enhanced by adequate funding for consumer groups which will provide consumer representatives the resources and capability to effectively represent consumers' interest in efficient and competitive markets.³

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 8, 2016

Joseph E. Bowring

President

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Regional Transmission Organizations, Order No. 2000, FERC Stats. & Regs.¶ 31,089 mimeo at 152 (1999), order on reh'g, Order No. 2000-A, FERC Stats. & Regs. ¶ 31,092 (2000), aff'd sub nom. Pub. Util. Dist. No. 1 of Snohomish County, Washington v. FERC, 272 F.3d 607 (D.C. Cir. 2001).

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 8th day of January, 2016.

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