

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

Whitetail Solar 2, LLC)	
)	Docket No. ER21-936-000
)	

**ANSWER AND MOTION FOR LEAVE TO ANSWER
OF THE INDEPENDENT MARKET MONITOR FOR PJM**

Pursuant to Rules 211, 212 and 213 of the Commission’s Rules and Regulations,¹ Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor (“Market Monitor”) for PJM Interconnection, L.L.C. (“PJM”),² submits this answer to the answer and plea filed by Whitetail Solar 2, LLC on March 16, 2021 (“March 16th Motion”). This answer is submitted to correct Whitetail 2’s mischaracterizations of the Market Monitor’s position, to avoid confusion and to facilitate the decision making process.

I. ANSWER

Whitetail 2 mischaracterizes (at 2, 3–5, 11–13) the Market Monitor’s position, claiming “the PJM IMM argues that only a generating project connected at transmission-level voltage is eligible to collect compensation under PJM Tariff Schedule 2.” Eligibility under Schedule 2 does not turn on whether a unit is connected at transmission level voltage. Eligibility turns on whether PJM has operational responsibility for the line at the unit’s point of interconnection, whether PJM is monitoring the unit’s power output to the line, and whether PJM is prepared to directly order the unit to operate in accordance with a

¹ 18 CFR §§ 385.211, 385.212 & 385.213 (2020).

² 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”).

voltage schedule. PJM does not take operational responsibility for the line at Whitetail 2's point of interconnection. PJM is not procuring reactive capability to support operation of that line.

The Market Monitor recognizes that PJM has telemetry (output from a meter) from the unit and dispatch authority over the unit. Neither of these facts contradicts the fact that PJM does not take operational responsibility for the line to which Whitetail 2 interconnects. PJM has telemetry from, and dispatch authority over, units that are specifically excluded from eligibility to receive reactive capability payments, including pseudo tied units.³

Whitetail 2 refers (at 8) to the explicit exclusion of behind the meter generation in Schedule 2 to the OATT. The exclusion does not support Whitetail 2's position. Units located behind the meter do provide MVArS but are not eligible for compensation.

Whitetail 2 disclaims its burden (at 9) to demonstrate its eligibility to collect a rate for reactive capability under Section 205 of the Federal Power Act. Similarly, Whitetail 2 disclaims responsibility (at 13–14) to demonstrate that such capability is “useful” to PJM. The issue of eligibility has not been decided, but the arguments raised on the burden of proof and the need to show usefulness are consistent with longstanding ratemaking concepts that should apply to eligibility to file rates for reactive capability.

II. MOTION FOR LEAVE TO ANSWER

The Commission's Rules of Practice and Procedure, 18 CFR § 385.213(a)(2), do not permit answers to answers or protests unless otherwise ordered by the decisional authority. The Commission has made exceptions, however, where an answer clarifies the issues or assists in creating a complete record.⁴ In this answer, the Market Monitor provides the

³ See OA Schedule 1 § 1.12.

⁴ See, e.g., *PJM Interconnection, L.L.C.*, 119 FERC ¶61,318 at P 36 (2007) (accepted answer to answer that “provided information that assisted ... decision-making process”); *California Independent System Operator Corporation*, 110 FERC ¶ 61,007 (2005) (answer to answer permitted to assist Commission

Commission with information useful to the Commission's decision making process and provides a more complete record. Accordingly, the Market Monitor respectfully requests that this answer be permitted.

III. CONCLUSION

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

Respectfully submitted,



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in decision-making process); *New Power Company v. PJM Interconnection, L.L.C.*, 98 FERC ¶ 61,208 (2002) (answer accepted to provide new factual and legal material to assist the Commission in decision-making process); *N.Y. Independent System Operator, Inc.*, 121 FERC ¶61,112 at P 4 (2007) (answer to protest accepted because it provided information that assisted the Commission in its decision-making process).

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 24th day of February, 2021.



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