

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

Jackson Generation, LLC)	Docket No. EL21-62-000,
)	EL21-63-000
v.)	
)	
PJM Interconnection, L.L.C.)	
)	

ANSWER OF THE INDEPENDENT MARKET MONITOR FOR PJM

Pursuant to Rule 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 motion of Jackson Generation, LLC (“Jackson”). Jackson filed a complaint on March 31, 2021 (“Complaint”) requesting that the Commission order PJM to change its calculation of its unit-specific offer under the Minimum Offer Price Rule (“MOPR”) under PJM’s Reliability Pricing Model (“RPM”) rules. Specifically, Jackson objects to PJM’s inclusion of sunk costs and the use of a twenty year asset life. The Market Monitor supports PJM’s determination and will file pleadings opposing the complaint in this proceeding.

The Market Monitor objects to Jackson’s proposed comments date of April 14, 2021, as unduly short. The Market Monitor agrees that a decision in this matter should not delay the capacity market auction. In order to obtain a decision in a timely and orderly manner

¹ 18 CFR § 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”).

prior to the opening of the Base Residual Auction (“BRA”) for the 2022/2023 Delivery Year, the Market Monitor requests a comment date of April 16, 2021, two days longer than the date requested by complainant. In addition, as part of ensuring a timely and orderly process, the Market Monitor proposes a specific pleading schedule:

	Jackson Proposal	IMM Proposal
Filing Date	March 31	March 31
Answer/Comments	April 14 (14 days)	April 16
Complainant Answer	–	April 23
Respondent Answer	–	April 30
Request for Order to Issue	May 17	May 17–May 19

Adoption of this schedule would provide a reasonable time frame and an orderly process to resolve the issues raised in this proceeding. The Market Monitor requests the adoption of this complete schedule in lieu of the comment date proposed by the complainant.

I. CONCLUSION

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

Respectfully submitted,

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Dated: March 31, 2021

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 March, 2021.



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