

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

Kendall County Solar Project, LLC)	Docket No. EL21-95-000
)	
v.)	
)	
PJM Interconnection, L.L.C.)	
)	

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 (“Market Monitor”) for PJM Interconnection, L.L.C. (“PJM”),² submits these comments responding to complaint filed August 9, 2021, by Kendall County Solar Project, LLC (“Complaint”).

The Complaint expresses dissatisfaction with PJM’s ability to complete interconnection studies on time. The Complaint also expresses concerns with the changes to the Network Upgrade Funding Agreement rules, filed on behalf of the PJM Transmission Owners, that would not allow Kendall County to fund their identified network upgrades themselves, but rather leave that decision up to the Transmission Owners.

Frustration with the current process is broadly shared. Both PJM and the Commission have initiated efforts to improve the process. But it is not correct to assert that

¹ 18 CFR § 385.211 (2021).

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”).

PJM alone is responsible for the issues and that therefore the Transmission Owners and the developers do not share significant responsibility.

The Complaint does not request relief that can be properly granted. Directing PJM to afford special deadlines applicable to complainant's projects is unduly discriminatory. The requested relief contrasts sharply with complainant's concern that other projects have received preferential attention. Granting the Complaint would be discriminatory and disruptive. The Complaint should be denied.

Complainant's concern about the market rule changes proposed by Transmission Owners are valid, but they are irrelevant to this proceeding. PJM did not sponsor the changes to its market rules, and its rules do not authorize the filing.³

It is unfair to attribute the problems with the study exclusively to PJM, and even less fair to attribute them to PJM staff. The queue includes many projects that sponsors know or should know will not be completed. For that reason, the volume of projects exceeds what the process can reasonably accommodate. The result of that is also that, by design, many projects will drop out of the queue. Projects dropping out of the queue create the need for restudies. Reform of the study process will require changing the incentives and requirements for all participants in PJM. These reforms are currently being evaluated through both the PJM stakeholder process as well as in Commission initiated filings.

The problems preventing the timely completion of interconnection studies cannot be corrected through the issuance of directives to PJM. Granting such a complaint would invite every participant in the queue to file a complaint to preserve its standing in the queue. The Complaint should be denied.

³ The Market Monitor filed a protest Docket No. ER21-2282 opposing the Transmission Owners' filing as unauthorized and contrary to competition.

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: August 30, 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 30th day of August, 2021.



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