

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

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| PJM Interconnection, L.L.C. |) | |
| |) | Docket No. ER21-2079-000 |
| |) | |

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 (“Market Monitor”) for PJM Interconnection, L.L.C. (“PJM”),² submits these comments responding to the filing submitted by PJM Interconnection, L.L.C. (“PJM”) on June 4, 2021 (“June 4th Filing”). The June 4th Filing proposed revisions to the PJM market rules to remove tariff provisions that allow an entity to buy through PJM congestion for certain interchange transactions that PJM would have otherwise curtailed by implementing the transmission loading relief (“TLR”) procedures.

The Market Monitor supports the proposed revisions and recommends that they be approved. The buy through provisions have never been used by any market participant in the approximately 20 years of availability. The buy through provisions, in addition to never having been used, are also obsolete. TLR procedures in PJM have become almost entirely unnecessary as a result of congestion management agreements between PJM and its neighbors. The need for PJM to call a TLR level 3a or higher (the only TLRs that trigger

¹ 18 CFR § 385.211 (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”).

curtailments) has decreased from 429 in 2004 to two in 2020.³ It should be standard practice to eliminate provisions in the market rules that serve no purpose.

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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³ See *2020 State of the Market Report for PJM: Volume 2* (March 11, 2021) Section 9: Interchange Transactions; See also *2021 Quarterly State of the Market Report for PJM: January through March*, (May 13, 2021) Section 9: Interchange Transactions.

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 25th day of June, 2021.



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