

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

Linden VFT, LLC

Riverview Power Holdings LLC

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Docket No. EC25-131-000

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

Pursuant to Rules 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 submitted by Linden VFT, LLC (“Linden VFT”) and Riverview Power Holdings LLC (“Applicants”) on September 19, 2025 (“September 19th Answer”), to the Market Monitor’s comments in this proceeding filed September 5, 2025 (“IMM Comments”).

On August 15, 2025 (“August 15th Filing”), Applicants filed a request for approval of a proposed transaction under Section 203 of the Federal Power Act (“Transaction”) in which Riverview Power Holdings, owned by Castleton Commodities International, LLC (“Castleton”), will acquire 100 percent ownership interests in Linden VFT from Power Holding LLC and its affiliate, Linden VFT Holding, LLC, resulting in Linden VFT becoming a wholly owned subsidiary of Riverview Power Holdings (“Riverview”). The ultimate parent company of Riverview is Energy Trading Innovations, LLC, and the ultimate parent

¹ 18 CFR §§ 385.212 & 385.213 (2025).

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”).

company of Power Holding LLC is GE Vernova, Inc. As a result of the Transaction, Riverview would become the owner of the VFT Linden Line.

The IMM Comments stated that the Transaction should not be approved without assurance that market power will not be created or exercised. The IMM Comments included questions to which the September 19th Answer was filed in response. The September 19th Answer explains (at 5) that Linden VFT will continue to offer capacity through the open solicitation process in the future.³ That future process may include affiliates, raising concerns about Castleton's participation in the open solicitation process because it would be on both sides of the transaction.⁴

The Transaction is not consistent with the public interest and should not be approved except with conditions that would ensure market power cannot be exercised. An open solicitation is required any time there is unallocated capacity on Linden VFT. Upon termination of the existing transmission scheduling rights (TSRs), all capacity on the Linden VFT will be allocated under an open season process approved by the Commission and should be subject to additional scrutiny given the proposed affiliation between Linden VFT, the transmission owner, and Castleton, a transmission user.⁵

I. ANSWER

The September 19th Answer does not eliminate the ability to exercise the market power created by the Transaction. The process in place under the 2018 Negotiated Rate Order

³ See September 19th Answer at 5.

⁴ See September 19th Answer at 7-8.

⁵ See 16 U.S.C. § 825b.

establishes an open solicitation with third party verification.⁶ However, it allows affiliates to participate in the process along with competitors.

The September 19th Answer (at 8) explains the provisions under the 2018 Negotiated Rate Order by which an independent third party reviews the open solicitation process to ensure that it is competitive and nondiscriminatory.⁷ There are no clear standards or metrics that define competitive and nondiscriminatory. Even with third party review, Castleton would have the ability and incentive to overbid for transmission capacity in the auction process, because any payment would be between affiliates. As part of the affirmation of a competitive and nondiscriminatory process, the third party reviewer should also validate the legitimacy of Castleton's bids. Castleton should be required to provide data justifying the level of its bid and demonstrating that the bid is not increased by the value of Castleton's market power. This additional scrutiny is necessary under the Transaction due to the new affiliation it would create between transmission user and owner.

The Transaction will provide Castleton with the ability to foreclose access to Linden VFT's transmission capacity to its competitors through its bidding in the open solicitation process. Linden VFT is valuable due to its ability to provide direct access to New York City, the most congested part of the NYISO market, from the PJM market. Capacity can be exported from PJM to NYISO using Linden VFT. Both Castleton and its competitors have generating capacity in PJM that could be used to serve NYISO load in New York City via Linden. Competitive pricing in NYISO and PJM depends on competitive access to the transmission linking the markets. If Castleton were granted the ability to monopolize access to Linden VFT through this Transaction, that competitive access would not be assured and efficient market outcomes would not be expected. This is a change from the situation under

⁶ See September 19th Answer at 2, citing *Linden VFT, LLC*, 119 FERC ¶61,066 (2007) (granting Linden VFT negotiated rate authority); *Linden VFT, LLC*, 162 FERC ¶ 61,297 (2018) ("2018 Negotiated Rate Order") (granting Linden VFT amended negotiated rate authority).

⁷ See September 19th Order at 8.

the current ownership by GE Vernova, under which Linden VFT is not affiliated with a user of its own transmission capacity. For this reason, the Transaction is relevant to the operation of Linden VFT. These issues stem from the ownership results of the proposed Transaction, not from the 2018 Negotiated Rate Order.

Under Section 203 of the Federal Power Act, the Commission approves transactions that are consistent with the public interest because they do not have an adverse impact on competition.⁸ This Transaction does not meet the criteria. The Transaction is not consistent with the public interest.⁹ The Transaction should not be approved. A commitment by Castleton to bid competitively in the open solicitation process, providing support for the assertion that the level of its bid is not increased due to its market power, is the only possible resolution to ensure that the Transaction does not cause harm to the markets.

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 protests, answers, or requests for rehearing 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.¹⁰ In this answer, the Market Monitor provides the Commission with information useful to the Commission's decision

⁸ See August 15th Filing at 2, citing 18 C.F.R. § 2.26.

⁹ See 16 U.S.C. § 824b.

¹⁰ 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 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).

making process and which 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 the Commission resolves the issues raised in this proceeding.

Respectfully submitted,



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Dated: October 6, 2025

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 6th day of October, 2025.



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