

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

	)		
Blossburg Power, LLC	)	Docket Nos.	ER19-2162-003
	)		EL23-107-000
	)		
Brunot Island Power, LLC	)		ER19-2152-003
	)		EL23-108-000
	)		
Gilbert Power, LLC	)		ER19-2153-003
	)		EL23-109-000
	)		
Hamilton Power, LLC	)		ER19-2161-003
	)		EL23-110-000
	)		
Hunterstown Power, LLC	)		ER19-2163-003
	)		EL23-111-000
	)		
Mountain Power, LLC	)		ER19-2157-003
	)		EL23-112-000
	)		
New Castle Power, LLC	)		ER19-2151-003
	)		EL23-113-000
	)		
Orrtanna Power, LLC	)		ER19-2158-003
	)		EL23-114-000
	)		
Portland Power, LLC	)		ER19-2155-003
	)		EL23-115-000
	)		
Sayreville Power, LLC	)		ER19-2154-004
	)		EL23-116-000
	)		
Shawnee Power, LLC	)		ER19-2159-003
	)		EL23-117-000
	)		
Shawville Power, LLC	)		ER19-2150-003
	)		EL23-118-000
	)		
Titus Power, LLC	)		ER19-2160-003
	)		EL23-119-000
	)		
Tolna Power, LLC	)		ER19-2164-003

	)	EL23-120-000
	)	
Warren Generation, LLC	)	ER19-2156-003
	)	EL23-121-000
	)	

**COMMENTS OF THE
INDEPENDENT MARKET MONITOR FOR PJM**

Pursuant to Rule 211 of the Commission’s Rules and Regulations,¹ and to the Order on Settlement issued in this proceeding on October 22, 2025 (“October 22nd Order”),² Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor (“Market Monitor”) for PJM Interconnection, L.L.C. (“PJM”),³ submits these comments on the response to additional information filed November 12, 2025, by the Heritage Reactive Suppliers (“Heritage”) as directed in the October 22nd Order (November 12th Response).

The October 22nd Order refers to the Commission’s recent finding that, “to be eligible for Reactive Service compensation under Schedule 2 of the PJM Tariff, a facility must be: (1) under the control of PJM (Control Requirement); and (2) operationally capable of providing voltage support to PJM’s transmission facilities such that PJM could rely on that facility to maintain transmission voltages (Capability Requirement).”⁴ The Commission further stated that the generation facilities at issue in Opinion No. 583 “were not directly connected to the Bulk Electric System [(“BES”)],” and “PJM reasonably concluded that the facilities would not have the ability to maintain transmission voltages within acceptable limits (i.e., provide

¹ 18 CFR § 385.211 (2025).

² *Brunot Island Power, LLC, et al.*, 193 FERC ¶ 61,056 (2025).

³ Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff (“OATT”).

⁴ October 22nd Order at P 10, citing *Whitetail Solar 3, LLC*, Opinion No. 583, 184 FERC ¶ 61,145 (2023) (*Whitetail* or “Opinion No. 583”).

voltage support).”⁵ The October 22nd Order also cites *Gaucha Solar LLC*, where the Commission rejected a proposed rate schedule because the “evidence in the record indicate[d] that the Gaucha Solar Facility is not directly connected to the transmission system (or BES).”⁶

The October 22nd Order states (at P 11) that “[t]he record here suggests that Heritage Reactive Suppliers’ Brunot Island Facility included in the Settlement is connected at 69 kV” and “may not be part of the PJM transmission system because this voltage level typically reflects a distribution-level interconnection, and therefore the Brunot Island Facility may not have the ability to provide voltage support as required.” Heritage was directed (at P 12) “to file additional information setting forth in detail whether the Brunot Island Facility is operationally capable of providing Reactive Service in a manner that can be relied on by the Transmission Provider to maintain transmission voltages within appropriate limits, as explained in Opinion No. 583 and *Gaucha Solar*.”

In its November 12th Response, Heritage provides no evidence that the facilities are PJM BES, and concedes (at 3) that the 69 kV facilities where the Brunot Island Facility interconnects are not BES as defined by NERC (BES is rated at 100kV or higher). Heritage argues (at 3) that Schedule 2 does not mention BES. Schedule 2 does refer to the “Transmission Provider’s transmission facilities.” PJM has clearly stated its position, a position consistent with Opinion No. 583, that eligibility for compensation under Schedule 2 depends on whether the facility is interconnected to the BES.⁷

⁵ *Id.*

⁶ *Id.*, citing *Gaucha Solar LLC*, 185 FERC ¶ 61,014, at P 31 (2023).

⁷ See *Flemington Solar, LLC, et al.*, Testimony of Daniel Moscovitz on behalf of PJM Interconnection, L.L.C. Regarding the Operational Capability of Facilities Not Directly Interconnected with the Bulk Electric System, Docket No. EL23-32-001, et al. (February 7, 2025) at 4:29–34 (“Generators that are used to maintain BES voltage must be directly interconnected to the BES. Voltage cannot be directly observed, modeled, or predicted without such a direct relationship between the generator and the BES. For a generator directly interconnected with the BES, PJM staff can observe changes in VARs and power factor, and can observe, model, and predict the effect of such facilities on the BES voltage because all of the equipment involved is in PJM’s purview.”).

Heritage claims (at 2–3) that the generators at the Brunot Island Facility are “operationally capable of producing or absorbing reactive power as required by PJM and in fact do so.” Dispatch for reactive support is relevant only to Opinion No. 583’s Control Requirement. Control is not the issue raised in the October 22nd Order. Whether or not the Facility has been dispatched to provide reactive support on the local system shows nothing relevant to whether the Facilities can provide reactive support to PJM’s transmission facilities or the BES.

Heritage references (at 3–4) the Market Monitor’s position in the *Whitetail* proceeding, which was not adopted in Opinion No. 583. Subsequent to the Market Monitor’s statement of its position in that case, PJM established its position setting interconnection to the BES as a clear bright line test for eligibility for compensation under Schedule 2. The Market Monitor adopted PJM’s position in subsequent proceedings. PJM’s position, with the Market Monitor’s support, had a significant impact on the outcome of several cases based on the definition of eligibility that were withdrawn prior to hearing or initial decision. Most significantly, Opinion No. 583 and *Gaucha Solar* adopted PJM’s position. Heritage cannot establish eligibility without showing that the Facility interconnects to the BES. Heritage has not done so.

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

Respectfully submitted,



Jeffrey W. Mayes

Joseph E. Bowring
Independent Market Monitor for PJM
President
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8051
joseph.bowring@monitoringanalytics.com

General Counsel
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8053
jeffrey.mayes@monitoringanalytics.com

Dated: November 21, 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 21st day of November, 2025.



Jeffrey W. Mayes

General Counsel

Monitoring Analytics, LLC

2621 Van Buren Avenue, Suite 160

Eagleville, Pennsylvania 19403

(610) 271-8053

jeffrey.mayes@monitoringanalytics.com