

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

Calpine Bethlehem LLC	)	Docket Nos.	ER14-874-007
	)		EL24-28-000
	)		
Calpine Mid-Atlantic Generation, LLC	)		ER14-875-007
	)		ER17-2566-006
	)		EL24-29-000
	)		
Calpine Mid Merit, LLC	)		ER12-954-009
	)		EL24-30-000
	)		
Calpine Mid-Merit II, LLC	)		ER19-2916-005
	)		EL24-31-000
	)		
Calpine New Jersey Generation, LLC	)		ER14-873-008
	)		ER15-2495-007
	)		EL24-32-000
	)		
Zion Energy LLC	)		ER10-2214-009
	)		EL24-33-000

**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 20, 2025 (“October 20th 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 additional information filed November 10, 2025, by Calpine Mid-Atlantic Generation,

¹ 18 CFR § 385.211 (2025).

² *Calpine Mid-Atlantic Generation, LLC, et al.*, 193 FERC ¶ 61,058 (2025).

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

LLC, et al. (“Calpine Mid-Atlantic”) as directed in the October 20th Order (“November 10th Response”).

The October 20th 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 voltage support).”⁵ The October 20th 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 20th Order states (at P 13) that “[t]he record here suggests that several of the Mid-Atlantic Facilities included in the Settlement are connected at 25 kV or below” and that “these facilities may not be part of the PJM transmission system because these voltage levels typically reflect distribution-level interconnections, and therefore the Mid-Atlantic Facilities may not all have the ability to provide voltage support as required.” Calpine Mid-Atlantic was directed (at P 14) “to file additional information setting forth in detail whether the Facilities are 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*.”

⁴ October 20th Order at P 12, citing *Whitetail Solar 3, LLC*, Opinion No. 583, 184 FERC ¶ 61,145 (2023) (*Whitetail* or “Opinion No. 583”).

⁵ *Id.*

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

In its November 10th Response, Calpine Mid-Atlantic states (at 3) that it is “providing information on the Bayview and Crisfield plants (together, the “Facilities”), because those are the only generation facilities owned by Mid-Atlantic whose interconnections involve distribution lines rated at 25 kV or below.” Calpine Mid-Atlantic argues (at 3–4) that the Facilities should be considered to be interconnected at 69 kV because “both Facilities are located on the high side of step-up transformers on the PJM transmission system.”

Calpine Mid-Atlantic provides no evidence that the Facilities are PJM BES, and concedes (at 4–5) that even if rated at 69 kV they are not BES as defined by NERC (BES is rated at 100kV or higher). Calpine Mid-Atlantic argues (at 5) 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

Calpine Mid-Atlantic claims (at 7) to “have identified instances where the Facilities were called upon by PJM to provide Reactive Service.” Dispatch for reactive support is relevant only to Opinion No. 583’s Control Requirement. Control is not the issue raised in the October 20th Order. Whether or not the Facilities have 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.

Calpine Mid-Atlantic references (at 5–6) 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

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.”).

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. Calpine Mid-Atlantic cannot establish eligibility without showing that the Facilities interconnect to the BES. Calpine Mid-Atlantic 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,



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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.



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