

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

Eagle Creek Reusens Hydro, LLC	)	Docket Nos. ER21-2832-000, -002
	)	
Great Falls Hydroelectric Company	)	ER21-2833-000, -002
	)	
	)	(not consolidated)
	)	

**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.³ (“PJM”), submits these comments on the additional information filed November 10, 2025, by Eagle Creek Reusens Hydro, LLC (“ECRH”) and Great Falls Hydroelectric Company (“GFHC”) as directed in the October 20th Order (“November 10th Response”).

In its October 20th Order (at P 19), the Commission found that “it is not clear from the record before us whether these Facilities meet the eligibility requirements of Schedule 2” and directed Applicants 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*.”

Neither ECRH nor GFHC provide any information demonstrating that either facility is “capable of providing Reactive Service in a manner that can be relied on by the

¹ 18 CFR § 385.211 (2025).

² *Eagle Creek Reusens Hydro, LLC, et al.*, 193 FERC ¶ 61,048 (2025)

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

Transmission Provider to maintain transmission voltages within appropriate limits, as explained in Opinion No. 583 and *Gaucha Solar*.”

No order has issued accepting the initially proposed rate or the rate proposed in a contested settlement. There is no filed rate. In the time that this case has been pending, other cases have established a bright line test for evaluating whether, based on the electrical location of interconnection, a facility is eligible for payment under Schedule 2. Neither ECRH nor GFHC demonstrate that they meet the standard set in in Opinion No. 583 and *Gaucha Solar*, or any other standard. 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.⁴ ECRH and GFHC raise only arguments considered and rejected in the Opinion No. 583.

Neither ECRH nor GFHC have demonstrated eligibility to file a rate under Schedule 2, and necessarily fail to support the rate as just and reasonable. All revenues were collected under an invalid rate not properly on file. Under the filed rate doctrine, all such revenues must be returned to PJM customers.

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

⁴ 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.”).

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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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