

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

Oxbow Creek Energy, LLC	)))	Docket No. ER19-2847-003 EL20-9-000
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**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 response to additional information filed November 10, 2025, by Oxbow Creek Energy, LLC (“Oxbow”) as directed in the October 20th Order (“November 10th Response”).

The October 20th Order refers to a 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,” 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

¹ 18 CFR § 385.211 (2025).

² *Oxbow Creek Energy LLC*, 193 FERC ¶ 61,046 (2025) (the “October 20 Order”).

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

⁴ October 20th Filing at P 16, citing *Whitetail Solar 3, LLC*, Opinion No. 583, 184 FERC ¶ 61,145 (2023) (“*Whitetail*” or “Opinion No. 583”).

⁵ *Id.*

The October 20th Order also cites *Gaucha Solar LLC*, wherein 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 [Bulk Electric System]).”⁶

The October 20th Order stated (at P 17) that “[t]he record here suggests that Oxbow Creek’s Facility included in the Settlement are connected at 34.5 kV or below,” and that “the Facility may not be part of the PJM transmission system because these voltage levels typically reflect distribution-level interconnections, and therefore the Facility may not all have the ability to provide voltage support as required.” Oxbow Creek was directed (at P 18) “to file additional information setting forth in detail whether the 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 the November 10th Response, Oxbow concedes (at 2) it is not interconnected to PJM BES. Oxbow argues (at 2) 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

Oxbow claims that “reactive power testing demonstrates clearly that the generators at the Oxbow Creek Facility are operationally capable of producing or absorbing reactive power as required by PJM.” The tests demonstrate no such thing. The test reveals information about the local MVAR output. The tests show nothing relevant to whether Oxbow can provide reactive support to the PJM BES.

⁶ *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.”).

Oxbow references (at 3) 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. Oxbow cannot establish eligibility without showing that the Facilities interconnect to the BES. Oxbow has not done so.

Oxbow cannot establish eligibility without showing that its facility interconnects to the BES. Oxbow 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