



Monitoring  
Analytics

July 26, 2012

Monitoring Analytics, LLC  
2621 Van Buren Avenue, Suite 160  
Valley Forge Corporate Center  
Eagleville, PA 19403  
Phone: 610-271-8050  
Fax: 610-271-8057

**IMM NOTIFICATION TO PJM MEMBERS OF DISCLOSURE  
OF CONFIDENTIAL INFORMATION PURSUANT TO  
OATT ATTACHMENT M-APPENDIX § I.D**

Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM (Market Monitor), has received the attached request for confidential information from the New Jersey Board of Public Utilities (BPU), in accordance with the procedures defined in Section I.D of Attachment M-Appendix to the PJM Open Access Transmission Tariff (OATT). The Federal Energy Regulatory Commission (FERC) has previously approved the BPU as an Authorized Commission pursuant to the Authorized Commission Procedures. The BPU is required to preserve the confidentiality of this data pursuant to the Non-Disclosure Agreement that the BPU entered into with PJM and the Certification provided to PJM. The BPU has affirmed that the information will only be shared with Authorized Persons who have executed a confidentiality agreement.

The Market Monitor must receive email notification ([MA@monitoringanalytics.com](mailto:MA@monitoringanalytics.com)) of any objections from Affected Members by **Wednesday, July 31, 2012**. If no objection is received, the information will be provided to the BPU. An objection initiates a process that first requires a conference between Affected Members and the BPU. If this conference does not produce a satisfactory result, Affected Members may pursue a fast track legal action at the FERC within three days, or the requested information will be supplied to the BPU.



**State of New Jersey**

BOARD OF PUBLIC UTILITIES  
44 SO. CLINTON AVENUE  
9<sup>TH</sup> FLOOR – P.O. BOX 350  
TRENTON, NEW JERSEY 08625-0350

**CHRIS CHRISTIE**  
GOVERNOR

**KIM GUADAGNO**  
LT. GOVERNOR

**ROBERT M. HANNA**  
PRESIDENT

TEL: (609) 777-3310  
FAX: (609) 292-2264

July 25, 2012

Dr. Joseph Bowring  
Independent Market Monitor  
Monitoring Analytics, LLC  
261 Van Buren Avenue, Suite 160  
Valley Forge Corporate Center  
Eagleville, PA 19403

RE: Confidential Request for IMM data regarding Operating Reserve Credits received by New Jersey-based units and organizations, and Market Concentration in New Jersey Control Zones

Dear Dr. Bowring:

Pursuant to the PJM Open Access Transmission Tariff (“OATT”) at Attachment M-Appendix § I.D, the New Jersey Board of Public Utilities (“NJBPU”) hereby requests information concerning generating stations in New Jersey that receive operating reserve credits for the various reasons covered in the 2011 State of the Market Report (“SOM”) at “Section 3, Operating Reserves.”

NJBPU specifically requests:

- 1) The annual credits, by category of operating reserve, received by each particular generating unit located within the state, as well as the owner of each unit;
- 2) A substantive review of the role of New Jersey units and generation owners in what the SOM depicts as a highly concentrated market for operating reserves, including a narrative and quantitative description of the market position of relevant units and generation owners, by name, providing these services in the New Jersey control zones; and

- 3) A quantification of the annual credits associated with operating reserves received by New Jersey units that provide support to the Con-Ed/PSEG wheeling contracts, in aggregate and by allocated category, as referenced in the SOM at page 82.

NJBPU will treat the requested information as confidential consistent with the OATT at Attachment M-Appendix § I.D and re-affirms that only Authorized Persons shall have access to the confidential information. The requested information is being sought to provide the NJBPU with a better understanding of the practical functioning of operating reserves dispatch within New Jersey. Should you have any technical questions on this matter, please contact Rene Demuynck at [r.demuynck@bpu.state.nj.us](mailto:r.demuynck@bpu.state.nj.us); legal questions should be directed to Chief Counsel Kenneth Sheehan at [kenneth.sheehan@bpu.state.nj.us](mailto:kenneth.sheehan@bpu.state.nj.us) or Legal Specialist Michael Borgatti at [michael.borgatti@bpu.state.nj.us](mailto:michael.borgatti@bpu.state.nj.us). Confidential data should be provided directly to Mr. Borgatti, as he will serve as custodian of this information.

Sincerely,



Robert M. Hanna  
President

c: Thomas Zadlo, PJM Interconnection, L.L.C.