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

	)	
Calpine Energy Services, L.P.	)	Docket No. ER15-376-000
	)	

## MOTION FOR EXTENSION OF THE INDEPENDENT MARKET MONITOR FOR PJM

Pursuant to Rule 212 and 2008 of the Commission's Rules and Regulations,<sup>1</sup> Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM<sup>2</sup> ("Market Monitor"), respectfully moves for an extension of time, at least two weeks, until December 17, 2014, for the submission of comments in response to the request for waivers of PJM market rules of Calpine Energy Services, L.P. ("Calpine"), submitted in the above captioned docket. The current deadline for the submission of comments is December 3, 2014.<sup>3</sup>

The Market Monitor requests an extension of time of two weeks to submit comments because Calpine's filing in this docket raises complicated issues and a series of case specific representations of its communications and activities on cold weather days that occurred earlier this year. Calpine's submittal requires more time for adequate consideration and analysis than the current deadline for comment affords. The Thanksgiving holidays reduce staff time available prior to the deadline. This is the fourth filing since May 5, 2014, requesting waivers or other relief in relation to losses on gas costs.<sup>4</sup> Experience with those

<sup>&</sup>lt;sup>1</sup> 18 CFR § 385.212 & 385.2008 (2013).

<sup>&</sup>lt;sup>2</sup> Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff ("OATT").

See Combined Notice of Filings #1 (November 12, 2014).

See Duke Energy Corporation, et al., Docket No. EL14-45; Eagle Point Power Generation, LLC, Docket No. ER14-2075; Old Dominion Electric Cooperative, ER14-2242.

prior filings has shown the need to thoroughly investigate the facts represented. The Commission granted an additional two weeks in a similar proceeding concerning a petition filed by Old Dominion Electric Cooperative.<sup>5</sup> As in that case, good cause exists to afford adequate time for an evaluation of material that took several months for the filing party to prepare.

An extension of the comment period by at least two weeks would yield a comment deadline of December 17, 2014. That additional time would allow the Market Monitor and other parties to submit more complete filings that will improve the record in this proceeding.

Accordingly, for good cause shown, the Market Monitor respectfully requests that the Commission grant this motion for extension.

Respectfully submitted,

Jeffrey W. Mayes

General Counsel Monitoring Analytics, LLC 2621 Van Buren Avenue, Suite 160 Valley Forge Corporate Center Eagleville, Pennsylvania 19403 (610) 271-8053

jeffrey.mayes@monitoringanalytics.com

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

Dated: November 17, 2014

Notice of Extension of Time, Docket No. ER14-2242-000 (July 3, 2014).

## **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 17<sup>th</sup> day of November, 2014.

Jeffrey W. Mayes General Counsel

Monitoring Analytics, LLC

2621 Van Buren Avenue, Suite 160

Afrey Mayer

Valley Forge Corporate Center

Eagleville, Pennsylvania 19403

(610) 271-8053

jeffrey.mayes@monitoringanalytics.com