UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

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PJM Interconnection, L.L.C.)	Docket No. ER16-372-006
)	

COMMENTS OF THE INDEPENDENT MARKET MONITOR FOR PJM

Pursuant to Rule 211 of the Commission's Rules and Regulations,¹ Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM ("Market Monitor"), submits these comments on the compliance filing submitted in the above captioned proceeding by PJM Interconnection, L.L.C. ("PJM") on May 28, 2019 ("May 28th Filing").² The May 28th Filing includes revisions consistent with the directives in the order issued April 29, 2019, in this proceeding ("April 29th Order").

The Market Monitor has requested clarification and/or rehearing of the April 29th Order. Language that the April 29th Order directed PJM to include is not consistent with the expressed goals in the order and in Commission rules relating to the market monitoring function. To the extent the Commission grants clarification and/or rehearing, PJM should be directed to file revisions fully consistent with such relief.

The Market Monitor respectfully requests that the Commission afford due consideration to these comments as the Commission resolves the issues raised in this proceeding.

¹ 18 CFR § 385.211 (2018).

Terms capitalized but not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff ("OATT"), PJM Operating Agreement ("OA") or PJM Reliability Assurance Agreement ("RAA").

Respectfully submitted,

Jeffrey W. Mayes

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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 6th day of June, 2019.

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