

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

White Tail Solar 1, LLC)	Docket No. ER20-714-000,
)	EL20-23-000
)	
)	

**REPLY OF THE INDEPENDENT MARKET MONITOR FOR PJM
IN OPPOSITION TO OFFER OF SETTLEMENT**

Pursuant to Rule 602(f) of the Commission’s Rules and Regulations,¹ Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor (“Market Monitor”) for PJM Interconnection, L.L.C.² (“PJM”), submits this reply in opposition to the offer of settlement filed in this proceeding on April 1, 2021, by White Tail Solar 1 LLC (“White Tail 1”).

The Market Monitor opposes the unilateral offer of settlement because White Tail 1 is not eligible to receive a rate for reactive capability from PJM under Schedule 2 of the PJM OATT. White Tail 1 is not interconnected to facilities operated by PJM. PJM does not include the facility where White Tail 1 interconnects to the grid as a Reportable Transmission Facility. Nor does PJM include that facility as a Monitored Transmission Facility. Under such circumstances, White Tail 1 cannot provide reactive capability to PJM because it is not interconnected to the PJM Transmission System. The Market Monitor has explained its position in a number of proceedings where the same issue has been raised, and incorporates the explanation of its position here by reference.³

¹ 18 CFR § 385.602(f) (2020).

² Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff (“OATT”).

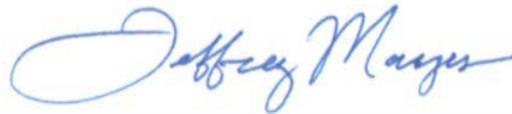
³ See *Whitetail Solar 2, LLC*, Protest of the Independent Market Monitor for PJM, Docket No. ER21-936-000 (February 16, 2021); *Whitetail Solar 2, LLC*, Answer and Motion for Leave to Answer of the

The Market Monitor understands that this is a black box offer of settlement that does not purport to resolve the issues on the merits. The Market Monitor does not oppose the offer settlement on the basis of other issues that can be appropriately resolved on a black box basis.

The issue of eligibility cannot be resolved on a black box basis. The basis for the level of the rate is concealed. The existence of the rate schedule is not concealed. Even if the other terms of the offer of settlement are approved, the issue of eligibility can and should be severed and litigated.

The offer of settlement should not be approved without a decision resolving the issue of whether White Tail 1 is eligible to file a rate for reactive capability under Schedule 2 to the OATT.

Respectfully submitted,



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Dated: April 21, 2021

Independent Market Monitor for PJM, Docket No. ER21-936-000 (March 24, 2021); *Whitetail Solar 3, LLC*, Comments and Motion of the Independent Market Monitor for PJM, Docket No. ER20-1851-000 (August 31, 2020); *Whitetail Solar 3, LLC*, Answer, Motion for Leave to Answer, and Comments of the Independent Market Monitor for PJM, Docket No. ER20-1851-000, -001 (November 12, 2020); *Ingenco Wholesale Power, LLC*, Comments and Motion of the Independent Market Monitor for PJM, Docket No. ER20-1863-000, -001 (August 31, 2020); *Ingenco Wholesale Power, LLC*, Answer and Motion for Leave to Answer of the Independent Market Monitor for PJM, Docket No. ER20-1863-000, -001 (November 4, 2020).

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 April, 2021.



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