

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

))
Talen Energy Marketing, LLC) Docket No. ER16-1456-000
))
))

**MOTION FOR LEAVE TO ANSWER
OF THE INDEPENDENT MARKET MONITOR FOR PJM**

Pursuant to Rule 212 of the Commission’s Rules and Regulations,¹ Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM (“Market Monitor”), moves for leave to answer, if it becomes necessary, the motion filed by Talen Energy Marketing, LLC (“Talen”), on December 5, 2016, opposing the Market Monitor’s motion to intervene in this proceeding, which was filed July 11, 2016.

Because the Market Monitor remains actively engaged in settlement discussions with Talen and believes that a settlement resolving its concerns can be achieved, it would not be productive to submit an answer at this time. Talen has indicated to the Market Monitor that it is fine with an extension of the time to answer the motion in light of the circumstances.

The next scheduled settlement conference in this proceeding is Tuesday, January 10, 2017. The Market Monitor proposes to file its answer, if it becomes necessary, on Friday, January 13, 2017. No ruling on this motion is sought unless and until an answer is filed.

The Commission’s Rules of Practice and Procedure, 18 CFR § 385.213(a)(2), do not permit answers to answers or protests unless otherwise ordered by the decisional authority. The Commission has made exceptions, however, where an answer clarifies the issues or

¹ 18 CFR §§ 385.212 (2016).

assists in creating a complete record.² If permitted to answer, the Market Monitor will provide the Commission with information useful to the Commission's decision-making process and provide a more complete record. Accordingly, the Market Monitor respectfully requests that an answer be permitted.

Respectfully submitted,



Jeffrey W. Mayes

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

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

Dated: December 23, 2016

² See, e.g., *PJM Interconnection, L.L.C.*, 119 FERC ¶61,318 at P 36 (2007) (accepted answer to answer that "provided information that assisted ... decision-making process"); *California Independent System Operator Corporation*, 110 FERC ¶ 61,007 (2005) (answer to answer permitted to assist Commission in decision-making process); *New Power Company v. PJM Interconnection, L.L.C.*, 98 FERC ¶ 61,208 (2002) (answer accepted to provide new factual and legal material to assist the Commission in decision-making process); *N.Y. Independent System Operator, Inc.*, 121 FERC ¶61,112 at P 4 (2007) (answer to protest accepted because it provided information that assisted the Commission in its decision-making process).

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 23rd day of December, 2016.



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