

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

Ingenco Wholesale Power, LLC

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Docket No. ER20-1863-000

ANSWER OF THE INDEPENDENT MARKET MONITOR FOR PJM

Pursuant to Rule 213 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. (“PJM”),² submits this answer to the motion for clarification filed by Ingenco Wholesale Power, LLC (“Ingenco”) on January 19, 2021 (“Motion”). Ingenco seeks clarification that the issue raised by the Market Monitor about the eligibility of its units to receive compensation for reactive capability under Schedule 2 to the OATT has been resolved. The issue has not been resolved. The Motion should be denied.

This proceeding concerns a filing submitted by Ingenco to establish rates for reactive capability under Schedule 2 to the PJM OATT for certain generating facilities owned by Ingenco at 15 electric generating stations located at four landfills in Virginia, Pennsylvania and Maryland.³ Ingenco has not established that the Ingenco Facilities are interconnected to the PJM Transmission System and are eligible to receive rates for reactive capability under Schedule 2 to the OATT. The Market Monitor filed a protest explaining the eligibility issue and recommending that Ingenco’s filing be rejected.

¹ 18 CFR §§ 385.213 (2020).

² Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff (“OATT”), the PJM Operating Agreement (“OA”) or the PJM Reliability Assurance Agreement (“RAA”).

³ See Ingenco Filing, Docket No. ER20-1863-000 (May 20, 2020) (“Ingenco Filing”). For a list of the stations, see Ingenco’s first deficiency response, Docket No. ER20-1863-000 (August 10, 2020) at 6–7.

On December 18, 2020, an order issued establishing hearing and settlement judge procedures (“December 18th Order”).⁴ The December 18th Order summarized the Market Monitor’s protest and Ingenco’s response (at PP 20–23), but did not address or resolve the eligibility issue. The December 18th Order states (at P 30), “we are setting the Rate Schedule for hearing in its entirety, including issues raised in protests.” The eligibility issue is within the scope of the issues raised in protests. The eligibility issue includes issues of law and fact that could be further developed in a hearing or other fact finding process. There is no basis in the December 18th Order for Ingenco’s argument that the eligibility issue has been resolved.

The Market Monitor respectfully requests that the Commission afford due consideration to these comments and deny the motion for clarification.

Respectfully submitted,



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Dated: February 3, 2021

⁴ *Ingenco Wholesale Power, LLC*, 173 FERC ¶ 61,247.

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 3rd day of February, 2021.



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