

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

Wabash Valley Power Association, Inc.)	
)	
v.)	Docket No. EL22-19-000
)	
PJM Interconnection, L.L.C., Independent)	
Market Monitor for PJM)	
)	

**ANSWER TO COMPLAINT
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 complaint filed by Wabash Valley Power Association, Inc. (“Wabash”) on December 3, 2021 (“Complaint”). The Complaint should be dismissed as moot or denied.

By order issued December 22, 2021, in Docket No. EL19-58-006 et al. (“December 22nd Order”), the Commission reversed its decision that created a forward looking Energy and Ancillary Services (“EAS”) offset, reinstated the previous backward looking EAS offset, and postponed the Base Residual Auction for the 2023/2024 Delivery Year.³ As a consequence of

¹ 18 CFR § 385.213 (2021).

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”).

³ 177 FERC ¶ 61,209 at P 2 (“We ...reverse the Commission’s determination that the prior backward-looking energy and ancillary services offset (E&AS Offset) is unjust and unreasonable [W]e also direct PJM to submit a compliance filing within 60 days of the date of this order to revise its Tariff

the December 22nd Order, unit specific market seller offer caps must be recalculated, including the Wabash's market seller offer cap, which is the subject of the Complaint. The December 22nd Order thus renders the Complaint moot.

Nevertheless, the Market Monitor denies the complaint and allegations made in support of the complaint. Pursuant to Rule 213(c)(2)(i), the Market Monitor affirms that every allegation in the Complaint is denied.⁴ If the Complaint is not withdrawn, if the Complaint is not dismissed as moot, or the proceeding is not otherwise resolved, the Market Monitor reserves the right to make further comment as it deems appropriate.

The Market Monitor notes that PJM argued that the complaint should be denied in an answer filed in this proceeding December 8, 2021.

All communications with respect to this pleading and in connection with this proceeding should be addressed to the following:

and Operating Agreement records previously accepted in this proceeding (to become effective May 1, 2022) to reflect the currently effective Reserve Penalty Factors and the ORDCs and restore its Tariff provisions related to its prior backward-looking E&AS Offset, effective November 12, 2020. Additionally, we recognize that PJM will need to delay the base residual auction (BRA) for the 2023/2024 delivery year to incorporate the revised E&AS Offset in the BRA for the 2023/2024 delivery year. Accordingly, we direct PJM to submit a compliance filing within 30 days of the date of this order proposing a new schedule for that BRA and subsequent BRAs.”).

⁴ 18 CFR § 385.213(c)(2)(i).

Joseph E. Bowring⁵
Independent Market Monitor for PJM
President
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8051
joseph.bowring@monitoringanalytics.com

Jeffrey W. Mayes⁶
General Counsel
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8053
jeffrey.mayes@monitoringanalytics.com

The Market Monitor respectfully requests that the Commission afford due consideration to this answer as the Commission resolves this proceeding.

Respectfully submitted,



Jeffrey W. Mayes

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

General Counsel
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8053
jeffrey.mayes@monitoringanalytics.com

Dated: January 3, 2022

⁵ Designated to receive service.

⁶ Designated to receive service.

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 January, 2022.



Jeffrey W. Mayes

General Counsel

Monitoring Analytics, LLC

2621 Van Buren Avenue, Suite 160

Eagleville, Pennsylvania 19403

(610) 271-8053

jeffrey.mayes@monitoringanalytics.com