

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

Bellflower Solar 1, LLC

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Docket No. EL24-106-000

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

Pursuant to Rules 212 and 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 answer filed September 16, 2026, by Bellflower Solar 1, LLC (“Bellflower”). Bellflower filed a motion to dismiss this proceeding on September 3, 2026, and the Market Monitor responded on September 15, 2026. This answer is necessary to correct a misstatement by Bellflower on the status of its current rate. Contrary to Bellflower’s misstatement, Bellflower’s rate has never been found just and reasonable. The investigation should proceed and the motion should be denied.

I. ANSWER

By order issued March 30, 2023, the Commission accepted Bellflower’s new rate and simultaneously opened an investigation in Docket No. EL23-25 and ER23-628, stating (at P 13):

¹ 18 CFR §§ 385.212 & 385.213 (2025).

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”).

Our preliminary analysis indicates that Bellflower's Rate Schedule has not been shown to be just and reasonable and may be unjust, unreasonable, unduly discriminatory or preferential, or otherwise unlawful. We find that Bellflower's Rate Schedule raises issues of material fact that cannot be resolved based on the record before us, and that are more appropriately addressed in the hearing and settlement judge procedures ordered below.³

The March 30th order did not find the rate just and reasonable.

By letter order issued August 28, 2026, the Commission approved an "uncontested settlement" in Docket No. EL23-25 and ER23-628 stating, "The Commission's approval of this Settlement does not constitute approval of, or precedent regarding, any principle or issue in these proceedings." The August 28th order applies the lower standard for "uncontested" settlements, not the just and reasonable standard. The August 28th order does not address or resolve issues raised in EL23-25 and ER23-628 on the merits. The August 28th order explicitly states that it sets no precedent for issues raised in other proceedings, such as Docket No. EL24-106.

Nevertheless, Bellflower incorrectly asserts (at 4), "the settlement resolved, on an uncontested basis following discovery, that the Rate Schedule is just and reasonable."

No issue concerning Bellflower's rate has been resolved on the merits. No finding that Bellflower's rate is just and reasonable exists. The investigation should continue. The motion should be denied.

II. MOTION FOR LEAVE TO ANSWER

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

³ *Bellflower Solar 1, LLC*, 182 FERC ¶ 61,219.

clarifies the issues or assists in creating a complete record.⁴ In this answer, the Market Monitor provides the Commission with information useful to the Commission's decision making process and which provides a more complete record. Accordingly, the Market Monitor respectfully requests that this answer be permitted.

III. CONCLUSION

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

Respectfully submitted,



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Dated: September 18, 2026

⁴ 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 18th day of September, 2026.



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