

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

PJM Interconnection, L.L.C. and)	Docket Nos. ER18-459-000,
Ohio Valley Electric Corporation)	ER18-460-000
)	

COMMENTS OF THE INDEPENDENT MARKET MONITOR FOR PJM

Pursuant to Rule 211 of the Commission’s Rules and Regulations,¹ Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM² (“Market Monitor”), submits these comments responding to the filing submitted by PJM Interconnection, L.L.C. (“PJM”) and Ohio Valley Electric Cooperation (“OVEC”) on December 15, 2017 (“December 15th Filing”) in connection with OVEC’s proposed integration into PJM.

It is important that the proposed integration occur in a manner that is consistent with efficient and competitive markets. This case presents issues that are substantially different than the prior cases related to integration into PJM. There are significant questions that should be answered in detail prior to approval of this integration.³ For example, issues of eligibility for Reliability Must Run status for the affected generating units and the

¹ 18 CFR § 385.211 (2017).

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 Protest and Request for Suspension and Hearings of American Municipal Power, Inc., Docket Nos. ER18-459-000 and ER18-460-000 (January 5, 2018); Comments Submitted on Behalf of the Public Utilities Commission of Ohio, Docket Nos. ER18-459-000 and ER18-460-000 (January 5, 2018); and Comments of the Office of the Ohio Consumers’ Counsel, Docket Nos. ER18-459-000 and ER18-460-000 (January 5, 2018).

appropriate definition and allocation of related costs have not been addressed. For example, issues of transmission cost allocation have not been addressed.

The Market Monitor supports the Public Utility Commission of Ohio's request (at 6) for issuance of a deficiency letter, or establishment of a more formal process consistent with AMP's request, that would require responses to the questions raised by intervenors and clarification of the issues raised by intervenors prior to a decision by the Commission on this request.

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

Respectfully submitted,



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Dated: January 5, 2018

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 5th day of January, 2018.



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