

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

PJM Interconnection, L.L.C.

)

Docket No. ER21-2582-000

MOTION FOR LEAVE TO CORRECT ERRATUM IN FILED AFFIDAVIT

Pursuant to Rule 212 of the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) Rules and Regulations, 18 C.F.R. § 385.212 (2021), the PJM Power Providers Group (“P3”) respectfully requests leave to correcting a drafting mistake in one sentence of the Affidavit of Roy J. Shanker, Ph.D., filed as Attachment B to P3’s protest filed in the above-captioned proceeding on August 20, 2021. Specifically, a sentence in paragraph 53 of the Shanker Affidavit, located at the bottom of page 26, should be corrected to read as follows: “As actually implemented, it appears that Dr. Cramton effectively calculated interval comparisons only between ~~Case 4~~ versus Cases 5 and 6.” A redline indicating this correction is appended at Attachment 1; a clean replacement page is appended at Attachment 2.

The Commission has good cause to grant this motion. Correcting this drafting error will ensure there is no misunderstanding about Dr. Shanker’s position on the methodological flaws in Dr. Cramton’s affidavit. Given the stage of this proceeding, accepting this correction can only enhance the accuracy of the Commission’s deliberations and will prejudice no party.

Respectfully submitted,

On behalf of the PJM Power Providers Group

By: /s/ Glen Thomas

Glen Thomas

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August 26, 2021

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 in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2021).

Dated at Washington, DC this 26th day of August, 2021.

By: /s/ Diane Slifer
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Attachment 1

comparing a baseline with no MOPR at all, no carbon pricing, and no economically indifferent generation –that is, without Dr. Cramton’s assumption that there would be 51,000 MW of intermittent generation and retention of approximately 6000 MW of nuclear generation, without regard to whether such generation is economic) to a series of change cases. This “without anything” case, describing the expansion and pricing of the PJM system without any of the policy actions of interest, would be Base Case 1. The change cases to establish the validity of the model for simple with/without comparison might be:

- Case 2 - Base Case 1 with the addition of the fixed resources;
- Case 3 – Base Case 1 with the addition of the carbon tax³⁵; and
- Case 4 – Base Case 1 with both carbon pricing and fixed resources.

Then one would validate the level of results and the resulting changes in Cases 2, 3 and 4 versus Case 1 (e.g., was there more entry of clean resources and retirements of high carbon resources). At a minimum, this is intended to show that the model can detect expected differences (interval changes), and with values that make sense and are amenable to separate calculation and verification or at minimum logical tests regarding the changes that are observed. It would then make sense (assuming a reasonable test result of these first three comparisons) to look at the interval differences between what Dr. Cramton used as his baseline (Case 4) and a Case 5 (combining case 4 with the Broad MOPR) and a Case 6 (combining Case 4 with the Narrow MOPR). Only with this sort of progressive and reasoned incremental approach can one even begin to understand if the interval comparisons of the model case results (which ultimately are the basis of Dr. Cramton’s conclusions that PJM relies on) are meaningful. As actually implemented, it appears that Dr. Cramton effectively calculated interval comparisons only between ~~Case 4~~ versus Cases 5 and 6. He ignored the importance of a clean baseline (Case 1) and the potentially overwhelming impacts of his two assumptions that are captured in Cases 2 and 3. These two incremental changes, the addition of carbon pricing at material levels and the price

³⁵ I understand that the intent of Dr. Cramton was to use a carbon price adder as a sort of proxy for other charges, but under his assumptions it reaches a level sufficiently high that it may by itself be driving results in both MOPR cases. This type of evaluation is designed to parse out such impacts.

Attachment 2

comparing a baseline with no MOPR at all, no carbon pricing, and no economically indifferent generation –that is, without Dr. Cramton’s assumption that there would be 51,000 MW of intermittent generation and retention of approximately 6000 MW of nuclear generation, without regard to whether such generation is economic) to a series of change cases. This “without anything” case, describing the expansion and pricing of the PJM system without any of the policy actions of interest, would be Base Case 1. The change cases to establish the validity of the model for simple with/without comparison might be:

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