UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

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PJM INTERCONNECTION, L.L.C.

Docket No. ER15-2370-000

COMMENTS OF THE PJM POWER PROVIDERS GROUP

The PJM Power Providers Group ("P3")¹ hereby submits these comments in support of the August 3, 2015, filing ("PJM Limited Waiver Request") by PJM Interconnection, L.L.C. ("PJM").² PJM requests a limited tariff waiver of provisions of the PJM Open Access Transmission Tariff ("Tariff"), Attachment DD, section 6.6(g) concerning the requirement that Capacity Market Sellers submit a pre-notification of deactivation by September 1, 2015, if that capacity seller plans to seek a must offer exception for the 2016 Base Residual Auction ("BRA"). PJM requests a limited waiver to extend that deadline to October 1, 2015. The PJM Limited Waiver Request is appropriate and good cause exists to grant the waiver.³

¹ P3 is a non-profit organization dedicated to advancing federal, state and regional policies that promote properly designed and well-functioning electricity markets in the PJM Interconnection, L.L.C. ("PJM") region. Combined, P3 members own over 84,000 MWs of generation assets, produce enough power to supply over 20 million homes and employ over 40,000 people in the PJM region covering 13 states and the District of Columbia. The comments contained in this filing represent the position of P3 as an organization, but not necessarily the views of any particular member with respect to any issue. For more information on P3, visit <u>www.p3powergroup.com</u>.

² On August 6, 2015, P3 filed a doc-less Motion to Intervene in the above-captioned proceeding.

³ *PJM Interconnection, L.L.C.*, Docket No. ER15-2370-000, August 3, 2015.

I. COMMENTS

Pursuant to the July 22, 2015 Order of the Federal Energy Regulatory Commission (the "Commission" or "FERC"),⁴ PJM proposed to delay the dates for the Transition Auctions for delivery years 2016/17 and 2017/2018. As a result, the new proposed schedule does not afford the appropriate time or information for a Capacity Market Seller to make deactivation decisions nor to submit a timely pre-notification under PJM's existing must offer provisions. As PJM explained in the Limited Waiver Request, a Capacity Market Seller may require information from all RPM Auctions prior to making a fully informed deactivation decision. This includes information resulting from the Transition Auctions.

If the Commission accepts PJM's proposed dates for the Transition Auctions, it is necessary for the September 1 deadline be moved to October 1. This limited waiver, if granted, would allow Capacity Market Sellers to understand the complete economic viability of their capacity. Such information is a critical prerequisite to the decision to deactivate a unit or not. PJM always contemplated that this information would be available to the capacity seller prior to the submission of a pre-notification of a deactivation and the related must offer exemption request. The 2016 BRA for Delivery Year 2019/20 should be no different. As PJM explained in the Limited Waiver Request, good cause exists for the Commission to grant the Limited Waiver request. P3 agrees.

⁴ *PJM Interconnection, L.L.C.,* 152 ¶ 61,604 (2015).

II. CONCLUSION

For the foregoing reasons, P3 respectfully requests that the Commission consider its comments, and accept the PJM's Limited Waiver with an order issued by the Commission by August 25, 2015.

Respectfully submitted,

On behalf of the PJM Power Providers Group

By: <u>/s/ Glen Thomas</u> Glen Thomas Diane Slifer GT Power Group 1060 First Avenue, Suite 400 King of Prussia, PA 19406 gthomas@gtpowergroup.com 610-768-8080

Dated: August 10, 2015

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 Washington, D.C., this 10th day of August, 2015.

On behalf of the PJM Power Providers Group By: /s/ Glen Thomas _____

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