

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

State Policies and Wholesale Markets            )   Docket No. AD17-11-000  
Operated by ISO New England Inc., New        )  
York Independent System Operator, Inc.,       )  
and PJM Interconnection, L.L.C.                )

**POST-TECHNICAL CONFERENCE COMMENTS OF THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**I. INTRODUCTION**

The Pennsylvania Public Utility Commission (PAPUC) files its Post-Technical Conference Comments in the above-captioned proceeding in response to the Federal Energy Regulatory Commission’s (FERC) Notice dated May 23, 2017. The PAPUC actively monitored the Technical Conference addressing state policies and the wholesale markets that was held May 1-2, 2017 and appreciates the opportunity to offer comments on this important FERC initiative.<sup>1</sup>

**II. COMMENTS**

The PAPUC fully supports the efforts of the FERC to reconcile issues relating to state policies and the electric wholesale market. As FERC is well aware, states within the PJM footprint are grappling with implementation of

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<sup>1</sup> These Comments are filed on behalf of the PAPUC collectively. Additionally, Vice Chairman Andrew G. Place of the PAPUC will be filing Comments in his individual capacity.

legislative and/or administrative initiatives to promote policies advancing renewable resources as well as other environmental objectives including reduction of greenhouse gases and energy efficiency, to preserve indigenous generation and to maintain electric reliability at reasonable costs. These varied state initiatives, especially those measures that involve out-of-market support, may come into conflict with the Federal Power Act and FERC jurisdiction as well as the efficient operation of the wholesale capacity and energy markets.

The Technical Conference provided both a serious discussion of the issues and recommendations for moving forward. The diversity of panelists from the regulatory, RTO/ISO, generation, environmental and market monitor sectors presented an array of viewpoints that ably displayed the range of issues that must be addressed by FERC as well as by states and electric industry stakeholders in the near term if the parallel paths of state energy policies and competitive wholesale markets are to harmoniously co-exist.

In this effort the PAPUC stands ready to actively participate in future FERC-led policy proposals that result from this Technical Conference. The PAPUC will continue to collaborate with other PJM states, PJM and industry stakeholders from the generation community to ensure a smooth evolution from the current market model to future market models that reconcile state policies with competitive market realities.

The PAPUC is not in a position to respond specifically to the FERC Staff's five potential Paths or to the follow-up questions contained in the May 23<sup>rd</sup> Notice. The Pennsylvania General Assembly is currently considering the issue of the potential closure of several nuclear generation facilities based on current wholesale market conditions. Legislative proposals in various forms are being considered on this issue in several PJM states including Ohio and New Jersey in addition to recently passed legislation in Illinois. Given the uncertainties surrounding possible legislative action, the PAPUC refrains from expressing specific comments on the five paths but does endorse the FERC's continued efforts to seek solutions and develop policy pathways engaging the states and industry stakeholders in this important effort.

### **III. CONCLUSION**

The Pennsylvania Public Utility Commission respectfully requests that the FERC consider its Comments in its future actions at this docket.

Respectfully submitted,

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Dated: June 22, 2017

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am on this date serving a copy of the foregoing document upon each person designated on the official service list compiled by the Federal Energy Regulatory Commission in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,

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Dated at Harrisburg, PA this 22<sup>nd</sup> day of June, 2017.