

March 19, 2020

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: Dockets EL16-49-000 and EL18-178-000

Dear Chairman Chatterjee, Commissioner McNamee and Commissioner Glick,

We the undersigned PJM members, public interest groups, and representative organizations of PJM members (collectively, “the Competitive Markets Coalition”) urge the Commission to prioritize a timely decision on PJM’s compliance filing in this docket. While members of the Competitive Markets Coalition have different views of the December 19 FERC Order, PJM’s March 18th compliance filing and different perspectives on capacity markets in general, we are united in the belief that the cycle of capacity market auctions needs to be restored as quickly as possible. The auction delays that have occurred to date have caused disruptions to the market certainty that is essential to PJM’s and its members’ success.

PJM has not conducted a Base Residual Auction since May of 2018. The lack of clarity into future market pricing has harmed capacity suppliers who need to make important decisions related to investments in new capacity, construction of new capacity and retirements of existing capacity. Similarly, consumers currently have a constrained view of forward market conditions that is impairing their ability to enter commercial arrangements or invest in demand response or energy efficiency. PJM has said clearly and appropriately that they cannot schedule an auction until the Commission has issued an order on compliance. Unresolved rehearing requests will also leave a legal shadow over the December 19th order, with similar effects. Accordingly, we urge the Commission to draw the compliance and rehearing process to a conclusion as quickly as possible.

The members of this coalition stand ready and willing to facilitate the speedy resolution of the compliance proceeding. We have worked diligently with PJM and the PJM IMM to resolve as many compliance issues as possible knowing that there are various and divergent requests for rehearing and clarification pending. Moving forward, a timely resolution from the Commission on compliance issues, and on rehearing requests to the December 19th Order will allow these critical capacity auctions to resume in 2020 and place PJM on track to resume its regular schedule of three-year forward capacity auctions.

Thank you for your consideration of this critical and unprecedented request.

Respectfully submitted,

Advanced Energy Management Alliance
(AEMA)

Ares EIF Management, LLC

American Petroleum Institute (API)

American Wind Energy Association (AWEA)

C Power Energy Management

Caithness Energy, L.L.C.

Calpine Corporation

Carroll County Energy LLC

Cogentrix

Competitive Power Ventures, Inc.

Eastern Generation, LLC

Electric Power Supply Association (EPSA)

Energy Professionals of Ohio (EPO)

Enel North America, Inc.

GenOn

Green Mountain Energy Company

Guernsey Power Station LLC

Homer City Generation, L.P

J-Power USA Development Co., Ltd

Longview Power, LLC

LS Power Development LLC

Natural Resources Defense Council (NRDC)

Moxie Freedom, LLC

NRG Energy

Pennsylvania Public Utility Commission

PJM Power Providers Group (P3)

Reliant Energy Northeast, LLC

Solar Energy Industries Association (SEIA)

South Field Energy LLC

Talen Energy

Tenaska, Inc.

TransAlta Corporation

Vistra Energy

Wheelabrator Technologies