



SmartestEnergy US LLC  
333 W. Washington St., Ste 140  
Syracuse, NY 13202

February 07, 2020

**Filed Electronically**

Hon. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Additional Requirements Regarding Registration as a PJM Load Serving Entity  
(Docket No. A-2019-3012703)**

Dear Secretary Chiavetta,

In accordance with the Commission's requirement detailed in the Secretarial Letter dated January 16, 2020, SmartestEnergy US LLC submits Schedule 17 of PJM's Reliability Assurance Agreement, as filed by PJM with FERC on January 29, 2020 as proof of registration as a PJM LSE.

If the Commission has any questions regarding this submission, please contact me at 315-498-1268 or via email [Kayla-Austin@smartestenergy.com](mailto:Kayla-Austin@smartestenergy.com).

Regards,

*Kayla Austin*

Kayla Austin  
Billing and Services Manager  
SmartestEnergy US, LLC



PJM Interconnection, L.L.C.  
2750 Monroe Boulevard  
Audubon, PA 19403

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January 29, 2020

Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E., Room 1A  
Washington, D.C. 20426

*Re: PJM Interconnection, L.L.C., Docket No. ER20-\_\_\_\_-000  
PJM Operating Agreement, Schedule 12 Membership List Amendments  
PJM Reliability Assurance Agreement, Schedule 17 Amendments*

Dear Secretary Bose:

Pursuant to section 205 of the Federal Power Act, 16 U.S.C § 824d (2006), and section 35.13 of the Federal Energy Regulatory Commission's (the "Commission's" or "FERC's")<sup>1</sup> regulations, 18 C.F.R. Part 35, PJM Interconnection, L.L.C. ("PJM") submits for filing proposed revisions to the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. ("Operating Agreement"), Schedule 12, and Reliability Assurance Agreement among Load Serving Entities in the PJM Region ("RAA"), Schedule 17, to update these lists to include new members, remove withdrawn members, reflect the signatories to the RAA, and reflect corporate name changes for the fourth quarter of 2019 beginning October 1, 2019 and ending December 31, 2019.

## **I. BACKGROUND**

On December 6, 2002, as revised December 20, 2002, PJM filed amendments to the "Membership Requirements" provisions of the Operating Agreement (1) to delete the requirement

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meaning specified in the PJM Operating Agreement, PJM Open Access Transmission Tariff, and PJM RAA, as appropriate.

that the Additional Member Agreements executed by new PJM Members be filed with the Commission; and (2) to permit entities to become PJM Members effective as of the date the Additional Members Agreements are countersigned by the president of PJM, rather than a date specified by the Commission.<sup>2</sup> PJM also added Operating Agreement, Schedule 12 that lists all current PJM Members.<sup>3</sup> The Commission accepted the December 6 Filing by order dated February 21, 2003.<sup>4</sup>

## **II. DESCRIPTION OF FILING**

### ***A. Revised Operating Agreement, Schedule 12***

PJM hereby submits for filing proposed revisions to the Operating Agreement, Schedule 12, which lists all the current PJM Members and includes updates to reflect (1) the addition of new PJM Members; (2) the removal of withdrawn PJM Members; and (3) PJM Members' corporate name changes up to, and including, December 31, 2019. Additionally, this filing includes ministerial clerical revisions to Operating Agreement, Schedule 12 to ensure that all members are listed in alphabetical order.

### ***B. Revised RAA, Schedule 17***

PJM hereby submits for filing proposed revisions to the RAA, Schedule 17, which lists all the current RAA signatories, and includes updates to reflect the addition of new RAA signatories through December 31, 2019.

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<sup>2</sup> See, PJM Transmittal Letter, Docket No. ER03-254-000, at 1 (December 6, 2002 ("December 6 Filing")).

<sup>3</sup> December 6 Filing at 2.

<sup>4</sup> *PJM Interconnection, L.L.C.*, 102 FERC ¶ 61,191 (2003).

**C. *Membership Withdrawals***

Pursuant to section 35.15 of the Commission's regulations, 18 C.F.R. Part 35, and Operating Agreement, section 4.1(c) and Operating Agreement, section 18.18.2, PJM submits a notice of entities that have withdrawn from membership in PJM. As set forth in these sections, a "...member may withdraw from [the Operating Agreement] upon ninety days' notice," provided, however, that such withdrawal shall not be effective until approved by the Commission. Additionally, Operating Agreement, Schedule 3, specifies that each group of Affiliates, Related Parties or Member that does not timely pay its annual membership fee by January 1 shall be deemed to have given notice of its intent to withdraw from PJM Membership in accordance with Operating Agreement, section 18.18.2 as noted above. The withdrawing entities specified in this filing have either failed to pay their annual membership fees when due or notified PJM of their intent to withdraw from PJM Membership ninety days prior to the effective date noted for the respective entity as shown in Attachment C.

**III. WAIVER AND EFFECTIVE DATE**

PJM requests a waiver of the Commission's notice requirements to permit a December 31, 2019 effective date, a date which includes the last member withdrawal following the requisite ninety days prior notice, for the revised Operating Agreement, Schedule 12, and the last amendment to the list of parties to RAA, Schedule 17. Waiver is appropriate in this circumstance to allow new PJM Members, withdrawing Members, and corporate name changes to be reflected in the revised Operating Agreement, Schedule 12, as of the requested effective date; a date that is tied to the effective date of the last membership withdrawal (*i.e.*, December 31, 2019). Waiver is appropriate with respect to RAA, Schedule 17, as to allow new parties, withdrawing parties, and corporate name changes to be reflected accurately therein.

#### IV. DOCUMENTS SUBMITTED

Along with this transmittal letter, PJM submits the following attachments:

1. Attachment A: Revised Operating Agreement, Schedule 12 and RAA, Schedule 17 (*Marked Tariff*);
2. Attachment B: Revised Operating Agreement, Schedule 12 and RAA, Schedule 17 (*Clean Tariff*);
3. Attachment C: List of Member Withdrawals;
4. Attachment D: List of New Members;
5. Attachment E: List of Member Corporate Name Changes; and
6. Attachment F: List of New Parties to RAA.

#### V. CORRESPONDENCE AND COMMUNICATION

The following individuals are designated for inclusion on the official service list in this proceeding and for receipt of any communication regarding this filing:

Craig Glazer  
Vice President–Federal Government Policy  
PJM Interconnection, L.L.C.  
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Washington, D.C. 20005  
(202) 423-4743  
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[steven.pincus@pjm.com](mailto:steven.pincus@pjm.com)

#### VI. SERVICE

PJM has served a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by posting this filing electronically. Electronic service is permitted as of November 3, 2008, under the Commission's regulations<sup>5</sup> pursuant to Order No. 714<sup>6</sup> and the Commission's Notice of Effectiveness of Regulations issued on October 28, 2008, in

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<sup>5</sup> See, 18 C.F.R. §§ 35.2, 154.2, 154.208 and 341.2.

<sup>6</sup> *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270 (2008).

Docket No. RM01-5-000. In compliance with those regulations, PJM will post a copy of this filing to the FERC filings section of the its internet site, located at the following link: <http://www.pjm.com/documents/ferc-manuals/ferc-filings.aspx> with a specific link to the newly filed document, and will send an e-mail on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region<sup>7</sup> alerting them that this filing has been made by PJM today and available by following such link. If the document is not immediately available by using the referenced link, the document will be available through the referenced link within 24 hours of the filing. Also, a copy of this filing will be available on the Commission's eLibrary website located at the following link: <http://www.ferc.gov/docs-filing/elibrary.asp> in accordance with the Commission's regulations and Order No. 714.

Respectfully submitted,

*/s/ Steven R. Pincus*

Craig Glazer  
Vice President – Federal Government Policy  
PJM Interconnection, L.L.C.

Steven R. Pincus  
Associate General Counsel  
PJM Interconnection, L.L.C.

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<sup>7</sup> PJM already maintains, updates, and regularly uses e-mail lists for all PJM Members and affected commissions.

Section(s) of the  
PJM Reliability Assurance Agreement  
(Clean Format)

## SCHEDULE 17

### PARTIES TO THE RELIABILITY ASSURANCE AGREEMENT

This Schedule sets forth the Parties to the Agreement:

AEP Energy, Inc.  
AEP Retail Energy Partners LLC  
AES Ohio Generation, LLC  
Agera Energy LLC  
Aggressive Energy LLC  
Agway Energy Services, LLC  
Algonquin Energy Services Inc.  
All American Power and Gas, LLC  
Allegheny Electric Cooperative, Inc.  
Allegheny Energy Supply Company, L.L.C.  
Alpaca Energy LLC  
Alpha Gas and Electric LLC  
Ambit Northeast, LLC  
American Electric Power Service Corporation on behalf of its affiliates:  
    Appalachian Power Company  
    Indiana Michigan Power Company  
    Kentucky Power Company  
    Kingsport Power Company  
    Ohio Power Company  
    Wheeling Power Company.  
American Municipal Power, Inc.  
American Power & Gas of IL, LLC  
American Power & Gas of MD, LLC  
American Power & Gas of NJ, LLC  
American Power & Gas of Ohio, LLC  
American Power & Gas of Pennsylvania, LLC  
American PowerNet Management, L.P.  
American Transmission Systems, Inc.  
AP Gas and Electric (PA), LLC  
APN Starfirst, LP  
Approved Energy II LLC  
Archer Energy, LLC  
ArcelorMittal USA LLC  
Arrow Energy RRH, LLC  
Astral Energy LLC  
Atlantic City Electric Company  
Atlantic Energy MD, LLC  
Avangrid Renewables, LLC  
Axpo U.S. LLC  
Baltimore Gas and Electric Company

Baltimore Power Company LLC  
Barclays Capital Services, Inc  
Bativa, IL (City of)  
BBPC LLC d/b/a Great Eastern Energy  
Blackstone Wind Farm, LLC  
Blue Ridge Power Agency, Inc.  
Borough of Butler, Butler Electric Division  
Borough of Chambersburg  
Borough of Columbia, PA  
Borough of Lavallette, New Jersey  
Borough of Milltown  
Borough of Mont Alto, PA  
Borough of Park Ridge, New Jersey  
Borough of Pemberton  
Borough of Pitcairn, Pennsylvania  
Borough of Seaside Heights, New Jersey  
Borough of South River, New Jersey  
Boston Energy Trading and Marketing LLC  
BP Energy Company  
Brookfield Renewable Energy Marketing US LLC  
BTG Pactual Commodities (US) LLC  
Capital Energy, LLC  
Calpine Energy Service, L.P.  
Calpine Energy Solutions, LLC  
Cargill Power Markets LLC  
Central Virginia Electric Cooperative  
Centre Lane Trading Limited  
Champion Energy Marketing LLC  
Champion Energy, LLC  
Choice Energy, LLC dba 4 Choice Energy, LLC  
CIMA Energy Solutions, LLC  
Cincinnati Bell Energy, LLC  
Citigroup Energy Inc.  
Citizens' Electric Company of Lewisburg, PA  
City of Cleveland, Department of Public Utilities, Division of Cleveland Public Power  
City of Dover, Delaware  
City of New Martinsville - WV  
City of Philippi - West VA  
City of Rochelle  
Cleveland Electric Illuminating Company  
CMS Resource Management Company  
Collegiate Clean Energy, LLC  
Commonwealth Edison Company  
ConocoPhillips Company  
Consolidated Edison Energy, Inc.  
Consolidated Edison Solutions, Inc.

Constellation Energy Power Choice, LLC  
Constellation Energy Services, Inc.  
Constellation NewEnergy, Inc.  
Constellation Power Source Generation, LLC  
Convanta Energy Group, LLC  
Convanta Energy Marketing LLC  
Credit Suisse (USA), Inc.  
Current Power & Gas Inc.  
Dayton Power & Light Company (The)  
DC Energy LLC  
Delaware Municipal Electric Corporation  
Delmarva Power & Light Company  
Denver Energy, LLC  
Devonshire Energy LLC  
Direct Energy Business, LLC  
Direct Energy Business Marketing, LLC  
Direct Energy Services, LLC  
Discount Power, Inc.  
DPL Energy Resources, Inc.  
DTE Atlantic, LLC  
DTE Energy Trading, Inc.  
Duke Energy Kentucky, Inc.  
Duke Energy Ohio, Inc.  
Duquesne Light Company  
Duquesne Light Energy, LLC  
DXT Commodities North America LLC  
Dynergy Energy Services, LLC  
Dynergy Kendall Energy, LLC  
Dynergy Marketing and Trade, LLC  
East Coast Power & Gas of New Jersey, LLC  
East Kentucky Power Cooperative, Inc.  
Easton Utilities Commission  
EDF Energy Services, LLC  
EDF Trading North America, LLC  
Eligio Energy, LLC  
Energetix, Inc.  
Energy Cooperative Association of Pennsylvania (The)  
Energy Cooperative of America, Inc.  
Energy Plus Holdings LLC  
Energy Services Providers, Inc.  
Energy Technology Savings, Inc.  
Energy Transfer Retail Power, LLC  
Energy.me Midwest llc d/b/a energy.me  
EnerPenn USA, LLC  
Engie Energy Marketing NA, Inc.  
ENGIE Retail, LLC

EnPowered USA Inc.  
Entrust Energy East, Inc.  
Evergreen Gas & Electric, LLC  
Everyday Energy, LLC  
Exelon Generation Co., LLC  
First Point Power, LLC  
FirstEnergy Solutions Corp.  
Freepoint Energy Solutions LLC  
Frontier Utilities Northeast, LLC  
Front Royal (Town of)  
Galt Power Inc.  
GenOn Power Midwest, LP  
Gerdau Ameristeel Energy, Inc.  
Great American Gas & Electric, LLC  
Great American Power, LLC  
Greenlight Energy Inc.  
Green Mountain Energy Company  
Hagerstown Light Department  
Harborside Energy, LLC  
Harrison REA, Inc. - Clarksburg, WV  
Hartee Parnters, LP  
HIKO Energy, LLC  
Holcim (US) Inc.  
Hoosier Energy REC, Inc.  
Horizon Power and Light LLC  
Hudson Energy Services, LLC  
IDT Energy, Inc.  
Illinois Municipal Electric Agency  
Illinois Power Marketing Company  
Inspire Energy Holdings, LLC  
Interstate Gas Supply, Inc.  
J.P. Morgan Ventures Energy Corporation  
Jack Rich, Inc. d/b/a Anthracite Power & Light Company  
J. Aron & Company LLC  
Jersey Central Power & Light Company  
Josco Energy USA, LLC  
Just Energy Solutions Inc.  
Kentucky Municipal Energy Agency  
Kiwi Energy NY LLC  
Kuehne Chemical Company, Inc.  
L & P Electric Inc., d/b/a Leggett & Platt Electric Inc.  
Land O'Lakes, Inc.  
Liberty Power Corp., L.L.C.  
Liberty Power Delaware LLC  
Liberty Power Holdings LLC  
LifeEnergy, LLC

Lower Electric, LLC  
LSC Communications US, LLC  
Lykins Oil Company d/b/a Lykins Energy Solutions  
Macquarie Cook Energy LLC  
Major Energy Electric Services LLC  
MC Squared Energy Services, LLC  
Meadow Lake Wind Farm LLC  
Meadow Lake Wind Farm II LLC  
Meadow Lake Wind Farm III LLC  
Meadow Lake Wind Farm IV LLC  
MeadWestvaco Corporation  
Median Energy Corp.  
Median Energy PA LLC  
Mega Energy Holdings, LLC  
Mercuria Energy America, Inc. Messer Energy Services, Inc.  
MeterGenius Inc.  
Metropolitan Edison Company  
MidAmerican Energy Company  
MidAmerican Energy Services, LLC  
Morgan Stanley Capital Group, Inc.  
Morgan Stanley Services Group Inc.  
MP2 Energy NE, LLC  
MPower NJ LLC  
National Gas & Electric, LLC  
NextEra Energy Marketing, LLC  
Nextera Energy Services New Jersey, LLC  
Nextera Energy Services, Illinois, LLC  
Nittany Energy, LLC  
Nordic Energy Services LLC  
North American Power and Gas LLC.  
North Carolina Electric Membership Corporation  
North Carolina Municipal Power Agency Number 1  
Northeastern REMC  
Northern States Power Company  
Northern Virginia Electric Cooperative – NOVEC  
NRG Power Marketing, L.L.C.  
nTherm, LLC  
Oasis Power, LLC dba Oasis Energy  
Ohio Edison Company  
Ohio Valley Electric Corporation  
Old Dominion Electric Cooperative  
Oxford Energy Services, LLC  
Palmco Power DC, LLC  
PALMco Power DE, LLC  
Palmco Power IL, LLC  
Palmco Power MD, LLC

Palmco Power NJ, LLC  
Palmco Power OH, LLC  
Palmco Power PA, LLC  
PALMco Power VA, LLC  
Park Power LLC  
Pay Less Energy, LLC  
PBF Power Marketing LLC  
PECO Energy Company  
Pennsylvania Electric Company  
Pennsylvania Grain Processing LLC  
Pennsylvania Power Company  
PEPCO Energy Services, Inc.  
Pilot Power Group, Inc.  
Pinnacle Power LLC  
Plymouth Rock Energy, LLC  
Potomac Electric Power Company  
Power UP Energy, LLC  
PPL Electric Utilities Corporation d/b/a PPL Utilities  
Prairieland Energy, Inc.  
Presto Energy, LLC  
Provision Power and Gas, LLC  
PSEG Energy Resources & Trade LLC  
PSEG Energy Solutions LLC  
Public Service Electric & Gas Company  
Pure Energy USA IL, LLC  
Pure Energy USA, LLC  
Realgy, LLC  
Red Oak Power, LLC  
Renaissance Power & Gas, Inc.  
ResCom Energy, LLC  
Residents Energy, L.L.C.  
Respond Power LLC  
Riverside Generating, LLC  
Rolling Hills Generating, LLC  
RPA Energy, Inc.  
RRI Energy Services, LLC  
RRI Energy Solutions East, LLC  
Rushmore Energy, LLC (new)  
S.J. Energy Partners, Inc.  
Sanford Energy Associates, LLC d/b/a Powervine Energy  
Santanna Energy Services  
Seward Generation, LLC  
SFE Energy, Inc.  
SFE Energy NJ, Inc.  
Shiple Choice LLC  
Smartest Energy US LLC

Solios Power Mid-Atlantic Trading LLC  
South Bay Energy Corp.  
South Jersey Energy Company  
Southeastern Power Administration  
Southern Indiana Gas & Electric  
Southern Maryland Electric Cooperative, Inc.  
Spark Energy, LLC  
Spring Energy RRH, LLC dba Spring Power & Gas  
Standard Gas & Electric, LLC  
Star Energy Partners LLC  
Starion Energy PA Inc.  
Stream Energy Columbia, LLC  
Stream Energy Delaware, LLC  
Stream Energy Illinois, LLC  
Stream Energy Maryland, LLC  
Stream Energy New Jersey, LLC  
Stream Energy Pennsylvania, LLC  
Stream Ohio Gas & Electric, LLC  
Summer Energy Midwest, LLC  
SunSea Energy LLC  
Sunwave USA Holdings Inc.  
Switch Energy, LLC  
Talen Energy Marketing, LLC  
Tenaska Power Services Co.  
Texas Retail Energy, LLC  
Thurmont Municipal Light Company  
Tidal Energy Marketing Inc.  
Titan Gas and Power  
Toledo Edison Company (The)  
Tomorrow Energy Corp  
Town of Berlin, Maryland  
Town of Williamsport  
Town Square Energy East, LLC  
TransAlta Energy Marketing (U.S.) Inc.  
TransCanada Power Marketing Ltd.  
Tri-County Rural Electric Cooperative, Inc.  
TriEagle Energy, LP  
Trustees of the University of Pennsylvania  
Twin Eagle Resource Management, LLC  
UGI Energy Services, LLC  
UGI Utilities, Inc. - Electric Division  
Verde Energy USA DC, LLC  
Verde Energy USA Illinois, LLC  
Verde Energy USA Maryland, LLC  
Verde Energy USA Ohio, LLC  
Verde Energy USA, Inc.

Vineland Municipal Electric Utility (City of Vineland)  
Virginia Electric & Power Company  
Viridian Energy PA LLC  
Vista Energy Marketing, L.P.  
Volunteer Energy Services, Inc.  
Wabash Valley Power Association, Inc.  
Wellsboro Electric Company  
West Penn Power Company d/b/a Allegheny Power  
WGL Energy Services, Inc.  
Wolverine Holdings, L.P.  
Wolverine Power Supply Cooperative, Inc.  
Xoom Energy Maryland, LLC  
Xoom Energy New Jersey, LLC  
XOOM Energy Ohio, LLC  
Xoom Energy, LLC  
York Generation Company, LLC