

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Policy Proceeding—Utilization of Storage	:	Docket No. M-2020-3022877
Resources as Electric Distribution Assets	:	
	:	

PETITION TO INTERVENE

Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM¹ (“Market Monitor”), hereby files this Petition to Intervene in the above-captioned matters before the Pennsylvania Public Utility Commission. In support of its petition, the Market Monitor states the following:

1. The Market Monitor is located at 2621 Van Buren Avenue, Suite 160, Eagleville, Pennsylvania.
2. The Market Monitor is an organization created to objectively monitor the competitiveness of PJM markets, funded by the members of PJM Interconnection, L.L.C.²
3. The Open Access Transmission Tariff (OATT) of PJM Interconnection, L.L.C., requires that the Market Monitor, among other things, monitor “Compliance with the PJM Market Rules,” “Actual or potential design flaws in the PJM Market Rules,” Structural problems in the PJM Market that may inhibit a robust and competitive market,” and “The potential for a Market Participant to exercise market power or violate any of the PJM Rules.”³

¹ PJM Interconnection, L.L.C. (“PJM”) is a Commission-approved Regional Transmission Organization. Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff (“OATT”) or the PJM (“OA”).

² OATT Schedule 9-MMU.

³ OATT Attachment M §§ II & IV.B 1-4.

4. As these proceedings involve questions pertaining to Commission policy relating to the utilization of storage resources as electric distribution Assets, it implicates matters within the Market Monitor's purview. Such policies may have a substantial impact on competition in the competitive wholesale electric markets administered by PJM Interconnection, L.L.C.
5. The Market Monitor's interest in the outcome of these proceedings is in protecting the public interest in PJM markets regulated through competition.
6. The Market Monitor has a substantial interest in these proceedings because it has the exclusive duty to perform the market monitoring function for PJM in accordance with the duties required by the PJM Tariff. No other party can adequately represent the Market Monitor's interests.
7. The Market Monitor requests that it be added to the official service lists and that all papers, pleadings, and notices be served on undersigned counsel, Jeffrey W. Mayes. The Market Monitor agrees to accept service by email at *jeffrey.mayes@monitoringanalytics.com*.

For the foregoing reasons, the Market Monitor respectfully requests that its Petition to Intervene be granted.

Respectfully submitted,



Jeffrey W. Mayes (Pa. Bar No. 209772)
General Counsel
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8053
jeffrey.mayes@monitoringanalytics.com

Dated: February 4, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy by email (or by mail for those refusing service by email) of the foregoing Petition to Intervene in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant) and the secretarial letter issued December 3, 2020, upon the following:

Coleen P. Kartychak, Esq.
Retail Energy Supply Association
698 Gamble Road
Oakdale, PA 15071

Patrick McDonnell
Acting Secretary
Department of Environmental Protection
Rachel Carson State Office Building
PO Box 2063
Harrisburg, PA 17105-2063

Darryl A Lawrence, Esq.
Office of Consumer Advocate
5th Floor Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923
dlawrence@paoca.org

Phillip Demanchick, Esq.
Office of Consumer Advocate
555 Walnut Street 5th Floor
Forum Place
Harrisburg, PA 17101
pdemanchick@paoca.org

Dated at Eagleville, Pennsylvania,
this 4th day of February, 2021.



Jeffrey W. Mayes
General Counsel
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8053
jeffrey.mayes@monitoringanalytics.com