

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

PJM Interconnection, L.L.C. : Docket No. ER09-1063-000
: Docket No. ER09-1063-001

**ANSWER OF THE ORGANIZATION OF PJM STATES, INC.
IN SUPPORT OF MOTION FOR EXTENSION OF TIME
OF THE INDEPENDENT MARKET MONITOR FOR PJM**

I. INTRODUCTION

Pursuant to Rule 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), the Organization of PJM States, Inc. (“OPSI”)¹ submits this Answer in support of the Motion for Extension of Time of the Independent Market Monitor (“IMM”) of PJM Interconnection, L.L.C. (“PJM”) filed in this proceeding on May 4, 2009.

On April 29, 2009 and in an Errata filed on May 1, 2009, PJM submitted proposed revisions to its Open Access Transmission Tariff (“Tariff”) and Operating Agreement (“OA”) in compliance with the Commission’s Order No. 719.² In the Combined Notice of Filings issued on May 7, 2009 the Commission established a Comment Date of May 27, 2009 for PJM’s compliance filings. In its Motion, the IMM informed the

¹ Current members of OPSI are: Delaware Public Service Commission, District of Columbia Public Service Commission, Illinois Commerce Commission, Indiana Utility Regulatory Commission, Kentucky Public Service Commission, Maryland Public Service Commission, Michigan Public Service Commission, New Jersey Board of Public Utilities, North Carolina Utilities Commission, Public Utilities Commission of Ohio, Pennsylvania Public Utility Commission, Tennessee Regulatory Authority, Virginia State Corporation Commission, and Public Service Commission of West Virginia.

² PJM filings submitted on April 29, 2009 and May 1, 2009 in Docket No. RM07-19-000 (docketed as Docket No. ER09-1063-000 and ER09-1063-001); *Wholesale Competition in Regions with Organized Electric Markets*, Order No. 719, 125 FERC ¶ 61,071 (2008).

Commission that it intends to submit proposed tariff revisions that would comply with Order No. 719 by the May 27 Comment Date, and requested that other parties be permitted an extension of the Comment Date until June 26, 2009. Subsequently, several other parties have intervened in this instant proceeding and have supported the IMM's request for an extension of the Comment Date.

II. OPSI'S INTEREST IN THIS INSTANT PROCEEDING

In Docket Nos. EL07-56 and EL07-58 the Commission approved the creation of an OPSI Advisory Committee that is comprised of five representatives selected by OPSI to provide advice to the Commission, MMU, PJM Board and PJM stakeholders regarding any matter concerning the MMU, market monitor, or the Market Monitoring Plan.³ Since PJM's Compliance in this instant proceeding has raised substantial issues related to the IMM, this proceeding is of great importance to OPSI and its members.

III. ANSWER IN SUPPORT OF THE IMM AND OTHER PARTIES' REQUEST FOR AN EXTENSION OF TIME

PJM's April 29, 2009 filing in this proceeding consists of nearly 300 pages and proposes numerous proposed revisions to the Tariff and OA. In its filing, PJM describes the stakeholder process, and OPSI and its individual members participated in these stakeholder meetings. However, that there was no stakeholder consensus reached regarding certain aspects of PJM's proposed modifications to the Market Monitoring

³ 122 FERC ¶ 61,257; P. 18; fn 15 (March 21, 2008).

Plan, OPSI believes it is prudent to first examine the IMM's response (which the IMM expects to file by May 27, 2009) before responding to both the PJM filing and the IMM's response.

IV. CONCLUSION

For the reasons outlined above, OPSI respectfully requests that the Commission grant an extension of time until June 26, 2009 to respond to PJM's compliance filing and the IMM's response in this proceeding.

Respectfully submitted,

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Dated: May 18, 2009

CERTIFICATE OF SERVICE

I hereby certify that I have this day served (as an email attachment) a copy of the foregoing document upon each party on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

Dated at Newark, Delaware, this 18th day of May, 2009.

/s/ Rajnish Barua
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Document Content(s)

OPSI response 20090518-final.PDF.....1