



## I. COMMENTS

Pursuant to the July 22, 2015 Order of the Federal Energy Regulatory Commission (the “Commission” or “FERC”),<sup>4</sup> PJM proposed to delay the dates for the Transition Auctions for delivery years 2016/17 and 2017/2018. As a result, the new proposed schedule does not afford the appropriate time or information for a Capacity Market Seller to make deactivation decisions nor to submit a timely pre-notification under PJM’s existing must offer provisions. As PJM explained in the Limited Waiver Request, a Capacity Market Seller may require information from all RPM Auctions prior to making a fully informed deactivation decision. This includes information resulting from the Transition Auctions.

If the Commission accepts PJM’s proposed dates for the Transition Auctions, it is necessary for the September 1 deadline be moved to October 1. This limited waiver, if granted, would allow Capacity Market Sellers to understand the complete economic viability of their capacity. Such information is a critical prerequisite to the decision to deactivate a unit or not. PJM always contemplated that this information would be available to the capacity seller prior to the submission of a pre-notification of a deactivation and the related must offer exemption request. The 2016 BRA for Delivery Year 2019/20 should be no different. As PJM explained in the Limited Waiver Request, good cause exists for the Commission to grant the Limited Waiver request. P3 agrees.

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<sup>4</sup> *PJM Interconnection, L.L.C.*, 152 ¶ 61,604 (2015).

## II. CONCLUSION

For the foregoing reasons, P3 respectfully requests that the Commission consider its comments, and accept the PJM's Limited Waiver with an order issued by the Commission by August 25, 2015.

Respectfully submitted,

On behalf of the PJM Power Providers Group

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Dated: August 10, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the Official Service List compiled by the Secretary in this proceeding.

Dated at Washington, D.C., this 10th day of August, 2015.

On behalf of the PJM Power Providers Group

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