

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

NRG Power Marketing LLC)	Docket No. ER22-1539-002
)	
NRG Business Marketing LLC)	Docket No. ER23-2688-002
		(consolidated)

**LIMITED REPLY COMMENTS OF
PJM INTERCONNECTION, L.L.C.**

Pursuant to Rule 602(f)(2) of the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) Rules of Practice and Procedure,¹ PJM Interconnection, L.L.C. (“PJM”) respectfully submits the following limited reply comments in response to the comments and protests submitted in this proceeding on April 22, 2024.²

I. LIMITED REPLY COMMENTS

PJM is a signatory to the settlement filed in this proceeding on April 2, 2024,³ and submits these limited reply comments to reemphasize its support for the April 2 Settlement. While PJM has not taken a position on any specific cost-of-service or monetary elements in this proceeding, most of the parties in this proceeding have reached consensus on those elements, and accordingly PJM believes that the April 2 Settlement represents a reasonable resolution to this proceeding, which ultimately is essential for reliability on the Delmarva peninsula.

¹ 18 C.F.R. § 385.602(f)(2) (“A comment on an offer of settlement may be filed not later than 20 days after the filing of the offer of settlement and reply comments may be filed not later than 30 days after the filing of the offer, unless otherwise provided by the Commission or the presiding officer.”). *See also* 18 C.F.R. § 385.202 (“Pleadings include any application, complaint, petition, protest, notice of protest, answer, motion, and any amendment or withdrawal of a pleading. Pleadings do not include comments on rulemakings or comments on offers of settlement.”).

² *NRG Power Marketing LLC*, Initial Comments of Commission Trial Staff, Docket No. ER22-1539-002 (Apr. 22, 2024) (“Trial Staff Comments”); *NRG Power Marketing LLC*, Protest of Maryland’s Office of People’s Counsel, Docket No. ER22-1539-002 (Apr. 22, 2024) (“Maryland OPC Protest”); *NRG Power Marketing LLC*, Protest of the Independent Market Monitor for PJM, Docket No. ER22-1539-002 (Apr. 22, 2024) (“IMM Protest”).

³ *NRG Power Marketing LLC*, Settlement Agreement and Offer of Settlement of NRG Business Marketing LLC, Docket No. ER22-1539-002 (Apr. 22, 2024) (the “April 2 Settlement”).

As PJM has previously indicated in this docket, PJM conducted reliability and planning analyses upon receipt of NRG's June 29, 2021 notice to deactivate⁴ Indian River Unit 4. Those studies identified multiple generation deliverability and N-1-1 thermal violations. Based on PJM's study of its Transmission System, PJM concluded that certain transmission constraints related to the deactivation of this unit would adversely affect the reliability of the Transmission System, absent upgrades to the system. PJM notified NRG that certain upgrades related to the deactivation of Unit 4 could not be completed by the proposed deactivation date and, therefore, in accordance with the PJM Tariff, Part V, section 113.2, PJM asked NRG to continue to operate Unit 4 beyond its desired deactivation date of May 31, 2022.

If approved, the April 2 Settlement will ensure that Unit 4 remains operational until necessary transmission upgrades are completed and energized, and accordingly, PJM respectfully requests that the Commission expeditiously approve the April 2 Settlement as filed.

⁴ See, PJM Open Access Transmission Tariff, Part V, section 113.1.

II. CONCLUSION

In accordance with the foregoing, PJM respectfully requests that the Commission accept these limited reply comments submitted herein.

Respectfully submitted,

/s/ Thomas DeVita

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*On behalf of
PJM Interconnection, L.L.C.*

May 2, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have this 2nd day of May, 2024 caused a copy of the foregoing document to be served upon each person designated on the official service lists compiled by the Secretary in this proceeding.

/s/ Thomas DeVita

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