
I. MOTION TO INTERVENE

On December 29, 2014, RC Cape May Holdings, LLC (“RC Cape May”) filed in this proceeding a revised rate schedule to update the cost-based revenue requirements for the provision of reactive supply and voltage control service from the B.L. England Generating Station in the PJM region (“December 29 Filing”). Resources providing reactive supply and voltage control in the PJM region are compensated pursuant to Schedule 2 of the PJM Open Access Transmission Tariff (“PJM Tariff”). Schedule 2 of the PJM Tariff provides that, for each month of Reactive Supply Service provided by generators in the PJM region, PJM “…shall pay each generation owner an amount equal to the generation owner’s monthly revenue requirement as accepted or approved by the Commission.” The revenue requirements set forth in the revised rate schedules filed in this proceeding are of the type contemplated by Schedule 2. As
administrator of the PJM Tariff, PJM has an interest in this proceeding that no other party can adequately represent. Accordingly, PJM moves to intervene in this proceeding.

II. COMMENTS

In the December 29 Filing, RC Cape May proposes revisions to its Rate Schedule FERC No. 2 based on the retirement of Unit 1 of the B. L. England Station. RC Cape May states that “[t]he Commission shall designate the effective date for [the rate schedule change].”¹

PJM requests that the Commission designate an effective date for the revised rate schedule that is the first day of a month. Such an effective date will facilitate the incorporation of RC Cape May’s revised revenue requirement into PJM’s monthly billing and settlement system. The charge for the monthly revenue requirement under Schedule 2 of the PJM Tariff is allocated to load and transmission customers based on their monthly usage. To properly align those customers’ monthly allocation with the actual period of service for which those customers are paying, PJM requests that monthly rate schedules receiving compensation under Schedule 2, such as those at issue in this proceeding, be effective on the first day of a month.

¹ December 29 Filing at p. 4.
III. CORRESPONDENCE AND COMMUNICATIONS

Correspondence and communications with respect to this filing should be sent to, and PJM requests the Secretary to include on the official service list, the following:

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IV. CONCLUSION

For the reasons stated above, PJM respectfully requests that the Commission grant PJM’s motion to intervene in this proceeding and require an effective date of the first day of a month for the revised rate schedule.

Respectfully submitted,

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January 16, 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 Audubon, PA this 16th day of January, 2015.

/s/ James M. Burlew
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