

183 FERC ¶ 61,163  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Willie L. Phillips, Acting Chairman;  
James P. Danly, and Mark C. Christie.

Essential Power OPP, LLC, Essential Power Rock Springs, LLC, and Lakewood Cogeneration, L.P.                      Docket Nos. EL23-53-000

v.

PJM Interconnection, L.L.C.

Aurora Generation, LLC, LSP University Park, LLC,                      EL23-54-000  
Rockford Power, LLC, Rockford Power II, LLC,  
University Park Energy, LLC, Elwood Energy LLC,  
Jackson Generation, LLC, Lee County Generating  
Station, LLC, and Lincoln Generating Facility, LLC

v.

PJM Interconnection, L.L.C.

Coalition of PJM Capacity Resources                      EL23-55-000

v.

PJM Interconnection, L.L.C.

Talen Energy Marketing, LLC                      EL23-56-000

v.

PJM Interconnection, L.L.C.

Lee County Generating Station, LLC                      EL23-57-000

v.

PJM Interconnection, L.L.C.

SunEnergy1, LLC                      EL23-58-000

v.

PJM Interconnection, L.L.C.

Lincoln Generating Facility, LLC                      EL23-59-000

v.

PJM Interconnection, L.L.C.

Parkway Generation Keys Energy Center LLC                      EL23-60-000

v.

PJM Interconnection, L.L.C.

Old Dominion Electric Cooperative v. PJM Interconnection, L.L.C.	EL23-61-000
Energy Harbor LLC v. PJM Interconnection, L.L.C.	EL23-63-000
Calpine Corporation v. PJM Interconnection, L.L.C.	EL23-66-000
Invenergy Nelson LLC v. PJM Interconnection, L.L.C.	EL23-67-000
East Kentucky Power Cooperative, Inc. v. PJM Interconnection, L.L.C.	EL23-74-000 (not consolidated)

## ORDER ESTABLISHING SETTLEMENT JUDGE PROCEDURES

(Issued June 5, 2023)

1. Between March 31, 2023, and May 31, 2023, 13 complaints were filed challenging PJM Interconnection, L.L.C.'s (PJM) assessment of penalties to capacity resources during Performance Assessment Intervals<sup>1</sup> triggered by PJM's invocation of emergency procedures during Winter Storm Elliott (Complaints). On April 14, 2023, PJM submitted a motion requesting that the Commission establish global settlement judge procedures

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<sup>1</sup> Performance Assessment Intervals are defined as each real-time settlement interval for which an Emergency Action has been declared by the Office of the Interconnection. PJM, Intra-PJM Tariffs, OATT I.1 Definitions – O – P – Q (27.2.0). Emergency Action is defined as any emergency action for locational or system-wide capacity shortages that either utilizes pre-emergency mandatory load management reductions or other emergency capacity, or initiates a more severe action including, but not limited to, a Voltage Reduction Warning, Voltage Reduction Action, Manual Load Dump Warning, or Manual Load Dump Action. PJM, Intra-PJM Tariffs, OATT, I.1 Definitions – E – F (32.2.0).

encompassing all of these complaint proceedings (Motion). As discussed below, we grant the Motion and establish settlement judge procedures.

## **I. Complaints**

2. Winter Storm Elliott struck the PJM region from December 23-25, 2022, causing severely cold weather.<sup>2</sup> PJM implemented emergency procedures, which triggered Performance Assessment Intervals, on December 23 and 24. In each of the above-captioned cases, complainants object to the assessment of penalties for shortfalls in their capacity resources' performance during these Performance Assessment Intervals. The complaints raise a host of issues including, for example, claims that PJM violated its Tariff and that PJM's Tariff may be unjust and unreasonable.

## **II. PJM's Motion**

3. PJM states that it requests the appointment of a settlement judge to actively engage, through publicly noticed settlement conferences, with PJM, the complainants, and any intervenors across all complaint proceedings in a concerted, good faith effort to seek consensual resolution of as many of the disputes as reasonably possible.<sup>3</sup>

4. PJM states that it plans to answer each complaint and demonstrate that it properly assessed penalties consistent with the PJM Tariff.<sup>4</sup> However, PJM also acknowledges that these disputes could take several years to resolve, considering the complaint, rehearing, and appeal processes.<sup>5</sup> PJM states that timely, consensual resolution of these disputes may help support the long-term health of the PJM resource adequacy construct.

5. PJM additionally notes that the Commission has granted motions for the appointment of settlement judges in other proceedings and that other complainants have similarly called for the use of settlement judge procedures or some other form of alternative dispute resolution.<sup>6</sup>

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<sup>2</sup> PJM Interconnection, L.L.C., *Winter Storm Elliott Frequently Asked Questions* at 3 (Apr. 12, 2023), <https://www.pjm.com/-/media/markets-ops/winter-storm-elliott/faq-winter-storm-elliott.ashx>.

<sup>3</sup> PJM Motion at 2.

<sup>4</sup> *Id.* at 3.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at 4.

6. PJM states that a global settlement proceeding would best provide, to the extent possible, a consistent outcome across these complaints.<sup>7</sup> To that end, PJM asserts that it seeks a single overarching settlement process, led and coordinated by a Commission administrative law judge to cover all of the complaint proceedings as well as any similar complaints that are filed by the time the Commission acts on the Motion.<sup>8</sup> PJM further notes that it does not seek suspension of any of the complaint proceedings while the settlement judge procedures are in effect.<sup>9</sup>

### III. Notice and Responsive Pleadings

7. Notices of the Complaints were published in the *Federal Register*.<sup>10</sup> Parties filing a motion to intervene in each docket are listed in Appendix A. A notice of PJM's motion was issued on April 18, 2023, providing that comments and answers to PJM's motion

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<sup>7</sup> *Id.* at 5.

<sup>8</sup> *Id.* at 5, 7.

<sup>9</sup> *Id.* at 6.

<sup>10</sup> See 88 Fed. Reg. 20,878 (Apr. 7, 2023) (setting April 20, 2023 as original comment date for EL23-53-000); 88 Fed. Reg. 22,022 (Apr. 12, 2023) (setting May 4, 2023 as original comment date for EL23-54-000 and EL23-55-000; and setting May 5, 2023 as original comment date for EL23-56-000, EL23-57-000, and EL23-58-000); 88 Fed. Reg. 22,442 (Apr. 13, 2023) (setting May 8, 2023 as original comment date for EL23-59-000); 88 Fed. Reg. 24,186 (Apr. 19, 2023) (setting April 26, 2023 as original comment date for EL23-60-000); 88 Fed. Reg. 25,632 (Apr. 19, 2023) (setting May 15, 2023 as original comment date for EL23-61-000); 88 Fed. Reg. 29,124 (May 5, 2023) (setting May 17, 2023 as original comment date for EL23-63-000); 88 Fed. Reg. 31,505 (May 17, 2023) (setting June 9, 2023 as comment date for EL23-66-000); 88 Fed. Reg. 32,213 (May 19, 2023) (setting June 1, 2023 as comment date for EL23-67-000). The Commission subsequently issued notices extending the deadlines in several of the dockets. *Essential Power OPP, LLC v. PJM Interconnection, L.L.C.*, Docket Nos. EL23-53-000, et al., Notice of Extension of Time (Apr. 21, 2023) (extending deadline to May 26, 2023 for Docket Nos. EL23-53-000, EL23-54-000, EL23-55-000, EL23-56-000, EL23-57-000, EL23-58-000, EL23-59-000, and EL23-60-000); *Old Dominion Electric Cooperative v. PJM Interconnection, L.L.C.*, Docket No. EL23-61-000, Notice of Extension of Time (May 3, 2023) (extending deadline to June 2, 2023 for Docket No. EL23-61-000); *Energy Harbor LLC v. PM Interconnection, L.L.C.*, Docket No. EL23-63-000, Notice of Extension of Time (May 11, 2023) (extending deadline to June 2, 2023 for Docket No. EL23-63-000); *Invenergy Nelson LLC v. PJM Interconnection, L.L.C.*, Docket No. EL23-67-000, Notice of Extension of Time (May 25, 2023) (extending deadline to June 9, 2023 for Docket No. EL23-67-000).

were due April 24, 2023. Timely comments and answers were filed by Lee County Generating Station, LLC (Lee County), SunEnergy1, LLC (SunEnergy), ComEd Zone Generators, Coalition of PJM Capacity Resources (Coalition), Competitive Power Ventures Holdings, LP (CPV Holdings), Old Dominion Electric Cooperative (ODEC), Calpine Corporation (Calpine), PJM Power Providers Group (P3), East Kentucky Power Cooperative, Inc. (EKPC), and Indeck Niles, LLC (Indeck Niles). Timely protests were filed by Vistra Corp. (Vistra) and Constellation Energy Generation, LLC (Constellation). Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM (Market Monitor), and Cordova Energy Company LLC (Cordova) filed out of time comments on April 28, 2023, and May 9, 2023, respectively. On May 9, 2023, PJM filed an answer.

8. Several commenters, including some of those who filed complaints, state that they support the establishment of immediate global settlement judge procedures.<sup>11</sup> Many commenters contend that resolving these complex disputes through protracted litigation before the Commission and courts may negatively affect the PJM market for years and that it is more efficient to engage in settlement discussions now.<sup>12</sup> Calpine agrees with PJM that good faith discussions aimed at prompt settlement will advance the long-term interests of the PJM market and the region it serves.<sup>13</sup>

9. Indeck Niles and P3 also argue that the global settlement must permit both complainants and intervenors to participate fully and receive relief.<sup>14</sup> SunEnergy and ComEd Zone Generators request that any global settlement procedure be flexible enough to allow individual complaints to be severable from any settlement.<sup>15</sup> ComEd Zone Generators requests that the Commission direct the settlement judge to take into account the individual circumstances of each complaint.<sup>16</sup> ComEd Zone Generators further request that the Commission clarify that the settlement judge will be empowered to oversee all aspects of settlement procedures, including overseeing informal settlement

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<sup>11</sup> See, e.g., Lee County Answer at 2; Coalition Answer at 4-5; ODEC Comments at 3; Calpine Comments at 2; P3 Comments at 2; Cordova Comments at 1.

<sup>12</sup> See, e.g., Coalition Answer at 5; Calpine Comments at 2; ODEC Comments at 3; Cordova Comments at 3.

<sup>13</sup> Calpine Comments at 2.

<sup>14</sup> See Indeck Niles Comments at 3; P3 Comments at 3-4.

<sup>15</sup> SunEnergy Comments at 1-2; ComEd Zone Generators Answer at 4-5.

<sup>16</sup> ComEd Zone Generators Answer at 4.

discovery.<sup>17</sup> Finally, ComEd Zone Generators suggest that the Commission add “non-decisional” staff to assist the settlement judge.<sup>18</sup>

10. Several commenters state that they anticipate filing a similar complaint in the near future and request that their proceeding be added to any settlement procedures.<sup>19</sup> Some commenters also note that the Commission should stay the obligation to pay the penalties, pending resolution of these proceedings.<sup>20</sup>

11. The Market Monitor states that it does not oppose instituting global settlement judge proceedings that would start without delay.<sup>21</sup> The Market Monitor states that a just and reasonable resolution should be based on consistent principles and should apply to all similarly situated market participants. The Market Monitor further states that a “black-box” settlement that lacks any explicit basis in principles and is not based on whether the outcome is just and reasonable should not be allowed to supplant the filed tariff rules.<sup>22</sup>

12. Vistra and Constellation argue that the Commission should first address the complaints on the merits. Vistra argues that the Commission should, instead of establishing settlement judge procedures, issue a merits determination for each complaint as expeditiously as possible.<sup>23</sup> Vistra stresses that, if the Commission does initiate settlement procedures, it should make clear that any settlement discussion must include generators who are entitled to bonus payments.<sup>24</sup>

13. Vistra and Constellation further contend that, if the Commission does initiate settlement judge procedures, it should first issue an interim order providing guidance and

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<sup>17</sup> *Id.* at 5.

<sup>18</sup> *Id.*

<sup>19</sup> *See, e.g.,* CPV Holdings Answer at 1-2; EKPC Answer at 2; Calpine Comments at 3.

<sup>20</sup> *See* Lee County Answer at 1; ComEd Zone Generators Answer at 3-4.

<sup>21</sup> Market Monitor Comments at 3.

<sup>22</sup> *Id.* at 3-4.

<sup>23</sup> Vistra Protest at 5-6.

<sup>24</sup> *Id.* at 9-10.

setting forth a legal framework within which settlement procedures can take place.<sup>25</sup> Constellation states that the Commission does not regularly establish settlement judge procedures at such an early stage, without some sort of initial order.<sup>26</sup> Vistra and Constellation also argue that allowing parties to settle is unfair to generators that performed during Winter Storm Elliott and undermines the capacity performance construct by signaling that penalties will be negotiable.<sup>27</sup> They further contend that any settlement should treat all generators the same, regardless of whether they filed a complaint.<sup>28</sup>

14. In its answer, PJM states that it is well within the Commission's authority to grant the Motion and initiate settlement procedures.<sup>29</sup> PJM states that it agrees that any settlement should treat all similarly situated generators the same, regardless of whether they submitted a complaint.<sup>30</sup> PJM asserts that it stands by its operators' actions but nevertheless recognizes that settlement discussions may help to resolve a number of key issues and save resources of all involved, including Commission staff.<sup>31</sup>

#### **IV. Discussion**

##### **A. Procedural Matters**

15. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2022), the notices of intervention and timely unopposed motions to intervene serve to make the entities that filed them parties to these proceedings.<sup>32</sup>

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<sup>25</sup> See *id.* at 10; Constellation Protest at 5-6.

<sup>26</sup> Constellation Protest at 7.

<sup>27</sup> See Vistra Protest at 8; Constellation Protest at 8.

<sup>28</sup> See Vistra Protest at 9-10; Constellation Protest at 9.

<sup>29</sup> See PJM Answer at 2-3.

<sup>30</sup> *Id.* at 3.

<sup>31</sup> *Id.* at 3-4.

<sup>32</sup> We note that not all of the intervention periods have lapsed in the above-captioned dockets. Consistent with our regulations, if no answer in opposition is filed within 15 days of a timely motion to intervene, the movant becomes a party. 18 C.F.R. § 385.214(c)(2022). The Chief Judge has authority to grant any late-filed intervention in

16. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2022), prohibits an answer to a protest unless otherwise ordered by the decisional authority. We accept PJM's answer because it has provided information that assisted us in our decision-making process.

## **B. Substantive Matters**

17. We grant the Motion to establish global settlement judge procedures to seek resolution of all matters raised in the complaint proceedings. We find that a settlement judge may assist the parties in reaching a satisfactory resolution of the issues raised in these proceedings. Given PJM's interest in finding a resolution to the issues raised in these proceedings – along with parties' general collective willingness to engage in settlement procedures – we find that these procedures are a reasonable first step. The Commission has previously found that providing parties the opportunity to enter into a mutually acceptable settlement of highly contested and complex issues is superior to years of ongoing litigation which, as PJM notes, could be disruptive to the market.<sup>33</sup> We therefore disagree with Vistra's argument that settlement may set a bad precedent and undermine the capacity performance construct.

18. The complainants raise a number of issues. For example, some complainants allege that PJM made errors in its load forecast. Other complainants assert that PJM was required, but failed to, curtail non-firm exports prior to entering into emergency procedures. Some complainants also argue that PJM assessed them penalties despite not being dispatched or scheduled by PJM. In its answers filed thus far, PJM has stated that its load forecast was reasonable and did not cause PJM to act in any way that was inconsistent with its Tariff. PJM has also argued that its Tariff provides it with authority to allow non-firm exports when PJM believes it could assist neighboring systems without jeopardizing PJM's reliability. PJM further contends that, to the extent a resource was penalized that was not scheduled, it was because of the seller's economic choices, (i.e., its operating parameter limitations), and it was thus still properly assessed penalties per the terms of the Tariff. We clarify that all issues raised in the complaint proceedings,

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accordance with 18 C.F.R. § 385.214(d).

<sup>33</sup> See, e.g., *San Diego Gas & Elec. Co. v. Sellers of Energy & Ancillary Servs.*, 122 FERC ¶ 61,009, at P 13 (2008) (“[T]he Commission strongly favors settlements, particularly in cases that are highly contested and complex.”); *The Mont. Power Co.*, 77 FERC ¶ 61,110, at 61,434 (1996) (“[T]he Commission strongly favors settlements, which provide the opportunity to eliminate the need for more lengthy proceedings if the parties reach an agreement on the issues that is compatible with the public interest”); see also *San Diego Gas & Elec. Co.*, 180 FERC ¶ 61,121, at P 9 (2022) (ordering settlement judge procedures before making any merits determinations).



including but not limited to those noted above, may be included in settlement discussions. Having made this clarification, we disagree with protests arguing that the Commission should first issue a merits order providing at least some guidance or setting forth a legal framework.

19. Accordingly, we direct that a settlement judge be appointed in the above-captioned dockets, pursuant to Rule 603 of the Commission's Rules of Practice and Procedure.<sup>34</sup> If the parties desire, they may, by mutual agreement, request a specific judge as the settlement judge in the proceeding. The Chief Judge, however, may not be able to designate the requested settlement judge based on workload requirements which determine judges' availability.<sup>35</sup> The settlement judge shall report to the Chief Judge and the Commission within 30 days of the date of the appointment of the settlement judge, concerning the status of settlement discussions and, if the settlement discussions are ongoing, again within 60 days of the appointment of a settlement judge.

20. If, after a total of 60 days from the appointment of the settlement judge, the parties have not reached an agreement, the Chief Judge shall terminate the settlement procedures and refer the matter back to the Commission; however, if the settlement judge reports that the parties are significantly progressing towards settlement and that continued negotiations may be profitable, the Chief Judge may grant the parties an extension to continue settlement procedures for up to an additional 30 days.

21. We note that the Motion does not request that the Commission hold the complaint proceedings in abeyance, and we agree with PJM that answers to the complaints may help all parties evaluate their litigation positions and, in that respect, may help advance the settlement process. Accordingly, answers to the complaints remain due on the date noticed for each complaint. The Commission, however, will abstain from addressing the merits while settlement negotiations are ongoing.

The Commission orders:

(A) Pursuant to Rule 603 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.603 (2022), the Chief Judge is hereby directed to appoint a settlement judge in this proceeding within 10 days of the date of this order. Such settlement judge shall have all powers and duties enumerated in Rule 603 and shall convene a settlement

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<sup>34</sup> 18 C.F.R. § 385.603.

<sup>35</sup> If parties decide to request a specific judge, they must make their joint request to the Chief Judge by telephone at (202) 502-8500 within five days of this order. The Commission's website contains a list of Commission judges available for settlement proceedings and a summary of their background and experience. (<http://www.ferc.gov/legal/adr/avail-judge.asp>).

conference as soon as practicable after the Chief Judge designates the settlement judge. If parties decide to request a specific judge, they must make their request to the Chief Judge within five days of the date of this order.

(B) The settlement judge shall file a report with the Commission and the Chief Judge on the status of the settlement discussion within 30 days of the appointment of the settlement judge, and, if the settlement discussions are ongoing, again within 60 days from the date of appointment of the settlement judge. If the Chief Judge grants any extensions, the settlement judge shall file a report at least every 30 days thereafter, informing the Commission and the Chief Judge of the participants' progress toward settlement.

(C) If, after a total of 60 days from the appointment of the settlement judge, the parties have not reached an agreement, the Chief Judge shall terminate the settlement procedures and refer the matter back to the Commission; however, if the settlement judge reports that the parties are significantly progressing towards settlement and that continued negotiations may be profitable, the Chief Judge may grant the parties an extension to continue settlement procedures for up to an additional 30 days.

By the Commission. Commissioner Clements is not participating.

( S E A L )

Kimberly D. Bose,  
Secretary.

**Appendix A**

**EL23-53**

AES Clean Energy Development, LLC  
American Clean Power Association  
American Electric Power Service Corporation  
American Municipal Power, Inc.  
Avangrid, Inc.  
BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Buckeye Power, Inc.  
Calpine Corporation  
Clearway Energy Group LLC  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
DC Energy, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC, et al.  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc.  
EDF Renewables, Inc.  
EDP Renewables North America LLC  
EFS Parlin Holdings, LLC  
East Kentucky Power Cooperative, Inc.  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Fairless Energy, L.L.C.  
Forked River Power LLC, et al.  
Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generating Station LLC

Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Illinois Municipal Electric Cooperative, Inc.  
Indeck Niles, LLC  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
LS Power Development  
LightSource Renewable Energy US, LLC  
Lincoln Generating Facility, LLC  
Long Island Power Authority  
LS Power Development  
Marcus Hook Energy, L.P.  
Maryland Office of People's Counsel  
Maryland Public Service Commission  
Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM  
Montpelier Generating Station, LLC  
Monument Generating Station, LLC  
NRG Power Marketing LLC, et al.  
National Grid Renewables Development, LLC  
New Jersey Board of Public Utilities  
New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation  
NRG Power Marketing LLC, et al.  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
Oregon Clean Energy, LLC  
Parkway Generation Operating LLC, et al.  
Pine Gate Renewables, LLC  
PJM Capacity Resources  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Companies, et al.  
Parkway Generation Operating LLC, et al.  
Pine Gate Renewables, LLC  
Public Citizen, Inc.  
Rev Renewables, LLC  
Rockland Electric Company  
Safe Harbor Water Power Corporation  
Salt City Solar LLC

Shell Energy North America (US), L.P.  
Sidney, LLC  
Sierra Club  
Solar Energy Industries Association  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Sustainable FERC Project, et al.  
Tait Electric Generating Station, LLC  
Talen Energy Marketing, LLC, et al.  
Tenaska, Inc.  
The Procter & Gamble Paper Products Company  
Union of Concerned Scientists  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc., et al.  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-54**

AES Clean Energy Development, LLC  
American Clean Power Association  
American Electric Power Company, Inc.  
American Municipal Power, Inc.  
Avangrid, Inc.  
BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Brunner Island, LLC  
Buckeye Power, Inc.  
Calpine Corporation  
Camden Plant Holding, L.L.C.  
Clearway Energy Group LLC  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC

DC Energy, LLC  
Direct Energy Business Marketing, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC  
Duke Energy Ohio, Inc. and Duke Energy Kentucky, Inc.  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc.  
EDF Renewables, Inc.  
EDP Renewables North America LLC  
EFS Parlin Holdings, LLC  
East Kentucky Power Cooperative, Inc.  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC  
Essential Power Rock Springs, LLC  
Fairless Energy, L.L.C.  
Forked River Power LLC  
Garrison Energy Center LLC  
H.A. Wagner LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
Invenergy Nelson LLC  
Lakewood Cogeneration, L.P.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
Lightsource BP  
Long Island Lighting Company d/b/a Power Supply Long Island  
Long Island Power Authority  
MC Project Company LLC  
Marcus Hook Energy, L.P.  
Maryland Office of People's Counsel  
Maryland Public Service Commission  
MC Project Company LLC  
Midwest Generation, LLC  
Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM  
Montour, LLC

Montpelier Generating Station, LLC  
Monument Generating Station, LLC  
NRG Power Marketing LLC  
National Grid Renewables Development, LLC  
Natural Resource Defense Council  
New Jersey Board of Public Utilities  
New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation  
NRG Power Marketing LLC  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
Oregon Clean Energy, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
PSEG Companies  
PSEG Energy Resources & Trade LLC  
PSEG Power LLC  
Parkway Generation Keys Energy Center LLC  
Parkway Generation Operating LLC  
Parkway Generation Sewaren Urban Renewal Entity LLC  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Companies  
PSEG Energy Resources & Trade LLC  
PSEG Power LLC  
Public Citizen, Inc.  
Public Service Electric and Gas Company  
Rev Renewables, LLC  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Sierra Club  
Solar Energy Industries Association  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Sustainable FERC Project  
Tait Electric Generating Station, LLC  
Talen Energy Marketing, LLC  
Tenaska, Inc.

The Procter & Gamble Paper Products Company  
Union of Concerned Scientists  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc.  
Vitol Solar I LLC  
Vitol Wind I LLC  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-55**

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Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Buckeye Power, Inc.  
Calpine Corporation  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
DC Energy, LLC  
Delaware Municipal Electric Corporation, Inc.  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC, et al.  
Eagle Point Power GenerationEDF Renewables, Inc.  
EDP Renewables North America LLC  
EFS Parlin Holdings, LLC  
East Kentucky Power Cooperative, Inc.  
EDF Renewables, Inc.  
EDP Renewables North America LLC  
EFS Parlin Holdings, LLC  
Electric Power Supply Association



Enel North America, Inc.  
Energy Group LLC  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC, et al. (Nautilus Entities)  
Fairless Energy, L.L.C.  
Forked River Power LLC, et al.  
Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generating Station LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
LS Power Development  
LightSource BP  
Lincoln Generating Facility, LLC  
Long Island Power Authority  
LS Power Development  
Marcus Hook Energy, L.P.  
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Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM  
Montpelier Generating Station, LLC  
Monument Generating Station, LLC  
Mt. Carmel Cogen, Inc.  
NRG Power Marketing LLC, et al.  
National Grid Renewables Development, LLC  
Natural Resource Defense Council Sustainable FERC Project  
New Jersey Board of Public Utilities  
New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation  
Northern Virginia Electric Cooperative  
NRG Power Marketing LLC, et al.  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
Oregon Clean Energy, LLC  
Organization of PJM States, Inc.

Parkway Generation Operating LLC, et al.  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Companies, et al.  
Parkway Generation Operating LLC, et al.  
Pine Gate Renewables, LLC  
Public Citizen, Inc.  
REV Renewables, LC  
Rockland Electric Company  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Sierra Club  
Solar Energy Industries Association  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Tait Electric Generating Station, LLC  
Tenaska, Inc.  
The Procter & Gamble Paper Products Company  
Union of Concerned Scientists  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc., et al.  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Wolverine Power Supply Cooperative, Inc.  
Yankee Street, LLC

**EL23-56**

AES Clean Energy Development, LLC  
American Clean Power Association  
American Electric Power Service Corporation  
American Municipal Power, Inc.  
Avangrid, Inc.  
BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC

Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
Buckeye Power, Inc.  
Calpine Corporation  
Clearway Energy Group LLC  
Coalition of PJM Capacity Resources  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
Cypress Creek Renewables, LLC  
DC Energy, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc.  
EDF Renewables, Inc.  
EDP Renewables North America LLC  
EFS Parlin Holdings, LLC  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC, et al.  
Fairless Energy, L.L.C.  
Forked River Power LLC  
Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
Independent Market Monitor for PJM  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC

LightSource BP  
Lincoln Generating Facility, LLC  
Long Island Power Authority and its wholly owned subsidiary Long Island Lighting Company d/b/a Power Supply Long Island  
LS Power Development, LLC  
Marcus Hook Energy, L.P.  
Maryland Office of People's Counsel  
Maryland Public Service Commission  
Montpelier Generating Station, LLC  
Monument Generating Station, LLC  
Mt. Carmel Cogen, Inc  
National Grid Renewables Development, LLC  
Natural Resource Defense Council et. al.  
New Jersey Board of Public Utilities  
New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation  
NRG Power Marketing LLC, et. al.  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
Oregon Clean Energy, LLC  
Parkway Generation Operating LLC, et al.  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Parkway Generation Operating LLC, et al.  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Companies, et. al.  
PUBLIC CITIZEN, INC  
Rev Renewables, LLC  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Sierra Club  
Solar Energy Industries Association  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Tait Electric Generating Station, LLC  
Tenaska, Inc

The Procter & Gamble Paper Products Company  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc., et. al.  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-57**

AES Clean Energy Development, LLC  
American Clean Power Association  
American Electric Power Service Corporation  
American Municipal Power, Inc.  
Avangrid, Inc.  
BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Buckeye Power, Inc.  
Calpine Corporation  
Clearway Energy Group LLC  
Coalition of PJM Capacity Resources  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
DC Energy, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC, et al.  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc.  
EDF Renewables, Inc.  
EDP Renewables North America LLC  
EFS Parlin Holdings, LLC  
Electric Power Supply Association  
Enel North America, Inc  
ENGIE Solidago Solar LLC  
Fairless Energy, L.L.C.  
Forked River Power LLC

Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
Independent Market Monitor for PJM  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
Lightsource BP  
Lincoln Generating Facility, LLC  
Long Island Power Authority and its wholly owned subsidiary Long Island Lighting Company d/b/a Power Supply Long Island  
LS Power Development, LLC  
Marcus Hook Energy, L.P.  
Maryland Office of People's Counsel  
Montpelier Generating Station, LLC,  
Monument Generating Station, LLC  
Mt. Carmel Cogen, Inc.  
National Grid Renewables Development, LLC  
New Jersey Board of Public Utilities  
New Jersey Division of Rate Counse  
North Carolina Electric Membership Corporation  
NRG Power Marketing LLC, et. al.  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
Oregon Clean Energy, LLC  
Parkway Generation Operating LLC, et al.  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
Parkway Generation Operating LLC, et al.  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
PSEG Companies, et. al.  
PUBLIC CITIZEN, INC  
Rev Renewables, LLC

Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Sierra Club  
Shell Energy North America (US), L.P.  
Sidney, LLC,  
Sierra Club  
Solar Energy Industries Association  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Sustainable FERC Project et. al.  
Tait Electric Generating Station, LLC  
Talen Energy Marketing, LLC  
Tenaska, Inc  
The Procter & Gamble Paper Products Company  
Vermillion Power, L.L.C  
Vistra Corp.  
Vitol Inc., et. al.  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-58**

AES Clean Energy Development, LLC  
American Clean Power Association  
American Electric Power Service Corporation  
American Municipal Power, Inc.  
Avangrid, Inc.  
BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Brunner Island, LLC  
Buckeye Power, Inc.  
Calpine Corporation  
Camden Plant Holding, L.L.C.  
Clearway Energy Group LLC

Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
Cypress Creek Renewables, LLC  
DC Energy, LLC  
Direct Energy Business Marketing, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC  
Duke Energy Ohio, Inc. and Duke Energy Kentucky, Inc.  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc.  
EDF Renewables, Inc.  
EDP Renewables North America LLC  
EFS Parlin Holdings, LLC  
East Kentucky Power Cooperative, Inc.  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC  
Essential Power Rock Springs, LLC  
Fairless Energy, L.L.C.  
Forked River Power LLC  
Garrison Energy Center LLC  
H.A. Wagner LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
Lakewood Cogeneration, L.P.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
Lightsource BP  
Lincoln Generating Facility, LLC  
Long Island Lighting Company d/b/a Power Supply Long Island  
Long Island Power Authority  
LS Power Development, LLC  
Marcus Hook Energy, L.P.  
Maryland Office of People's Counsel  
MC Project Company LLC



Marcus Hook Energy, L.P.  
Maryland Office of People's Counsel  
Midwest Generation, LLC  
Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM  
Montour, LLC  
Montpelier Generating Station, LLC  
Monument Generating Station, LLC  
Mt. Carmel Cogen, Inc.  
NRG Power Marketing LLC  
National Grid Renewables Development, LLC  
Natural Resource Defense Council Sustainable FERC Project  
New Jersey Board of Public Utilities  
New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation  
Northern Virginia Electric Cooperative, Inc.  
NRG Power Marketing LLC  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
Oregon Clean Energy, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
PSEG Companies  
PSEG Energy Resources & Trade LLC  
PSEG Power LLC  
Parkway Generation Keys Energy Center LLC  
Parkway Generation Operating LLC  
Parkway Generation Sewaren Urban Renewal Entity LLC  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Companies  
PSEG Energy Resources & Trade LLC  
PSEG Power LLC  
Public Citizen, Inc.  
Public Service Electric and Gas Company  
Rev Renewables, LLC  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Sierra Club

Solar Energy Industries Association  
Southern Maryland Electric Cooperative, Inc.  
Sunnybrook Farm Solar, LLC  
Tait Electric Generating Station, LLC  
Talen Energy Marketing, LLC  
Tenaska, Inc.  
The Procter & Gamble Paper Products Company  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc.  
Vitol Solar I LLC  
Vitol Wind I LLC  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-59**

AES Clean Energy Development, LLC  
American Clean Power Association  
American Electric Power Service Corporation  
American Municipal Power, Inc.  
Avangrid, Inc.  
BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
Buckeye Power, Inc.  
Calpine Corporation  
Clearway Energy Group LLC  
Coalition of PJM Capacity Resources  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
DC Energy, LLC

Dominion Energy Services, Inc.  
Duke Energy Business Services LLC  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative  
EDF Renewables, Inc.  
EDP Renewables North America LLC  
EFS Parlin Holdings, LLC  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC  
Fairless Energy, L.L.C.  
Forked River Power LLC  
Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Indeck Niles, LLC  
Independent Market Monitor for PJM  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
Lightsource BP  
Long Island Power Authority and its wholly owned subsidiary Long Island Lighting Company d/b/a Power Supply Long Island  
LS Power Development, LLC  
Marcus Hook Energy, L.P.  
Maryland Office of People's Counsel  
Montpelier Generating Station, LLC  
Monument Generating Station, LLC  
Mt. Carmel Cogen, Inc.  
National Grid Renewables Development, LLC  
Natural Resource Defense Council et. al.  
New Jersey Board of Public Utilities  
New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation  
O.H. Hutchings CT, LLC

Old Dominion Electric Cooperative  
Parkway Generation Operating LLC, et al.  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
Pine Gate Renewables, LLC  
Public Citizen, Inc. PSEG Companies, et. al.  
Public Citizen, Inc.  
Rev Renewables, LLC  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Sierra Club  
Solar Energy Industries Association  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Tait Electric Generating Station, LLC  
Talen Energy Marketing, LLC et. al.  
Tenaska, Inc.  
The Procter & Gamble Paper Products Company  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc., et. al.  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-60**

American Clean Power Association  
American Electric Power Service Corporation  
American Municipal Power, Inc.  
Avangrid, Inc.  
BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
BREG Aggregator LLC

Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Buckeye Power, Inc.  
Calpine Corporation  
Clearway Energy Group LLC  
Coalition of PJM Capacity Resources  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
DC Energy, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc  
EDP Renewables North America LLC  
EFS Parlin Holdings, LLC  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC  
Fairless Energy, L.L.C.  
Forked River Power LLC  
Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
Independent Market Monitor for PJM  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
LightSource BP  
Lincoln Generating Facility, LLC  
Long Island Power Authority and its wholly owned subsidiary Long Island Lighting  
Company d/b/a Power Supply Long Island  
LS Power Development, LLC  
Marcus Hook Energy, L.P.  
Maryland Office of People's Counsel  
Montpelier Generating Station, LLC  
Monument Generating Station, LLC

National Grid Renewables Development, LLC  
Natural Resource Defense Council  
New Jersey Board of Public Utilities  
New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation  
NRG Power Marketing LLC, et. al.  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
Oregon Clean Energy, LLC  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Companies, et. al.  
Public Citizen, Inc  
Rev Renewables, LLC  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Sierra Club  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Tait Electric Generating Station, LLC  
Talen Energy Marketing, LLC  
Tenaska, Inc.  
The Procter & Gamble Paper Products Company  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc.  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-61**

American Clean Power Association  
American Electric Power Service Corporation  
American Municipal Power, Inc.  
BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC

Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
Boston Energy Trading and Marketing LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Buckeye Power, Inc.  
Calpine Corporation  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
DC Energy, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc.  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC, et al.  
Fairless Energy, L.L.C.  
Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
LS Power Development, LLC  
Lincoln Generating Facility, LLC  
LS Power Development, LLC  
Marcus Hook Energy, L.P.  
Maryland Office of People's Counsel  
Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM  
Montpelier Generating Station, LLC  
Monument Generating Station, LLC  
New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation

Northern Virginia Electric Cooperative, Inc.  
NRG Power Marketing LLC, et al.  
O.H. Hutchings CT, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
PSEG Companies, et al.  
Parkway Generation Keys Energy Center LLC  
Parkway Generation Operating LLC  
Parkway Generation Sewaren Urban Renewal Entity LLC  
Pine Gate Renewables, LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Companies, et al.  
Public Citizen, Inc.  
Rev Renewables, LLC  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Tait Electric Generating Station, LLC  
Tenaska, Inc.  
The Procter & Gamble Paper Products Company  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc.  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-63**

American Electric Power Service Corporation  
American Municipal Power, Inc.  
BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
BREG Aggregator LLC



Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Buckeye Power, Inc.  
Calpine Corporation  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
DC Energy, LLC  
Direct Energy Business Marketing, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC  
Duke Energy Ohio, Inc. and Duke Energy Kentucky, Inc.  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc.  
Enel North America, Inc.  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC  
Essential Power Rock Springs, LLC  
Fairless Energy, L.L.C.  
Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
LS Power Development, LLC  
Lakewood Cogeneration, L.P.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
Lincoln Generating Facility, LLC  
LS Power Development, LLC  
Marcus Hook Energy, L.P.  
Midwest Generation, LLC  
Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM  
NRG Power Marketing LLC  
Montpelier Generating Station, LLC  
Monument Generating Station, LLC

New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation  
NRG Power Marketing LLC  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
Parkway Generation Keys Energy Center LLC  
Parkway Generation Operating LLC  
Parkway Generation Sewaren Urban Renewal Entity LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Companies  
PSEG Energy Resources & Trade LLC  
PSEG Power LLC  
Parkway Generation Keys Energy Center LLC  
Parkway Generation Operating LLC  
Parkway Generation Sewaren Urban Renewal Entity LLC  
Public Citizen, Inc.  
Public Service Electric and Gas Company  
Rev Renewables, LLC  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Tait Electric Generating Station, LLC  
Tenaska Inc.  
The Procter & Gamble Paper Products Company  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc.  
Vitol PA Wind Marketing LLC  
Vitol Solar I LLC  
Vitol Wind I LLC  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-66**

American Electric Power Service Corporation

BIF II Safe Harbor Holdings LLC  
BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Buckeye Power, Inc.  
Clearway Energy Group LLC  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
Direct Energy Business Marketing, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc.  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC, et al.  
Fairless Energy, L.L.C  
Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
Invenergy Nelson LLC  
J-POWER USA Development Co., Ltd.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
LS Power Development, LLC  
Lincoln Generating Facility, LLC  
LS Power Development, LLC  
Marcus Hook Energy, L.P.  
Midwest Generation, LLC  
Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM  
Montpelier Generating Station, LLC  
Monument Generating Station, LLC

New Jersey Division of Rate Counsel  
North Carolina Electric Membership Corporation  
NRG Power Marketing LLC  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
Organization of PJM States, Inc.  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
PSEG Companies et al.  
Parkway Generation Keys Energy Center LLC  
Parkway Generation Operating LLC  
Parkway Generation Sewaren Urban Renewal Entity LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Companies et al.  
Public Citizen, Inc.  
REV Renewables, LLC  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Tait Electric Generating Station, LLC  
Tenaska, Inc.  
The Procter & Gamble Paper Products Company  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc.  
Vitol PA Wind Marketing LLC  
Vitol Solar I LLC  
Vitol Wind I LLC  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

**EL23-67**

American Electric Power Service Corporation  
American Municipal Power, Inc.  
BIF II Safe Harbor Holdings LLC

BIF III Holtwood LLC  
Big Sandy Peaker Plant, LLC  
Blooming Grove Wind Energy Center LLC  
Bluestone Farm Solar, LLC  
BREG Aggregator LLC  
Brookfield Power Piney & Deep Creek LLC  
Brookfield Renewable Trading and Marketing LP  
Buckeye Power, Inc.  
Calpine Corporation  
Clearway Energy Group LLC  
Constellation Energy Generation, LLC  
Cordova Energy Company LLC  
Direct Energy Business Marketing, LLC  
Dominion Energy Services, Inc.  
Duke Energy Business Services LLC  
Duke Energy Ohio, Inc. and Duke Energy Kentucky, Inc.  
Eagle Point Power Generation LLC  
East Kentucky Power Cooperative, Inc.  
Electric Power Supply Association  
Enel North America, Inc.  
ENGIE Solidago Solar LLC  
Essential Power OPP, LLC  
Essential Power Rock Springs, LLC  
Fairless Energy, L.L.C.  
Garrison Energy Center LLC  
Harts Mill Solar, LLC  
Hawks Nest Hydro LLC  
Hawtree Creek Farm Solar, LLC  
Hazleton Generation LLC  
Homer City Generation, L.P.  
Illinois Municipal Electric Agency  
Indeck Niles, LLC  
J-POWER USA Development Co., Ltd.  
LS Power Development, LLC  
Lakewood Cogeneration, L.P.  
Lee County Generating Station, LLC  
Leeward Renewable Energy, LLC  
Lincoln Generating Facility, LLC  
LS Power Development, LLC  
Marcus Hook Energy, L.P.  
Midwest Generation, LLC  
Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM

Montpelier Generating Station, LLC  
Monument Generating Station, LLC  
New Jersey Division of Rate Counsel  
NRG Power Marketing LLC  
North Carolina Electric Membership Corporation  
NRG Power Marketing LLC  
O.H. Hutchings CT, LLC  
Old Dominion Electric Cooperative  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
PSEG Companies  
PSEG Energy Resources & Trade LLC  
Parkway Generation Keys Energy Center LLC  
Parkway Generation Operating LLC  
Parkway Generation Sewaren Urban Renewal Entity LLC  
PJM Industrial Customer Coalition  
PJM Power Providers Group  
Powells Creek Farm Solar, LLC  
PSEG Power LLC  
PSEG Companies  
PSEG Energy Resources & Trade LLC  
Public Citizen, Inc.  
Public Service Electric and Gas Company  
Rev Renewables, LLC  
Safe Harbor Water Power Corporation  
Salt City Solar LLC  
Shell Energy North America (US), L.P.  
Sidney, LLC  
Southern Maryland Electric Cooperative, Inc.  
SunEnergy1, LLC  
Sunnybrook Farm Solar, LLC  
Tait Electric Generating Station, LLC  
Tenaska, Inc.  
The Procter & Gamble Paper Products Company  
Vermillion Power, L.L.C.  
Vistra Corp.  
Vitol Inc.  
Vitol PA Wind Marketing LLC  
Vitol Solar I LLC  
Vitol Wind I LLC  
Whitehorn Solar LLC  
Wolf Hills Energy, LLC  
Yankee Street, LLC

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Calpine Corporation

Direct Energy Business Marketing, LLC

LS Power Development, LLC

Midwest Generation, LLC

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NRG Power Marketing LLC

PJM Industrial Customer Coalition

Rev Renewables, LLC

Southern Maryland Electric Cooperative, Inc.

The Procter & Gamble Paper Products Company