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OCT 22 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Monitoring Analytics, LLC
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Phone: 610-271-8050
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VIA FEDERAL EXPRESS

October 19, 2018

Hon. Aida Camacho-Welch
Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor
Trenton, NJ 08625-0350

RECEIVED
CASE MANAGEMENT

OCT 22 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Re: In the Matter of the Implementation of L. 2018, c. 16 Regarding
the Establishment of a Zero Emission Certificate Program for
Eligible Nuclear Power Plants (EO18080899), et al.

Dear Secretary Camacho-Welch:

Enclosed please find an original and ten copies of the Motion to Intervene, Motion for Admission *Pro Hac Vice*, and Affidavit in Support of Motion to Appear *Pro Hac Vice* of the Independent Market Monitor for PJM.

By copy of this letter, copies of the documents are being forwarded this date via electronic mail to all persons whose names appear on the attached distribution list. If there are any questions regarding this matter, please do not hesitate to contact me.

Respectfully submitted,

Jeffrey W. Mayes
General Counsel
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleview, Pennsylvania 19403
(610) 271-8053
jeffrey.mayes@monitoringanalytics.com

Case Mgmt
List Copied

Docket No. EO18091018

MOTION TO INTERVENE OF THE INDEPENDENT MARKET MONITOR FOR PJM

Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM¹ ("Market Monitor"), hereby moves pursuant to N.J.A.C. 1:1-16.1 et seq., to intervene in the above-captioned matters before the New Jersey Board of Public Utilities. In support of its petition for leave to intervene, the Market Monitor states the following:

1. The Market Monitor is an organization created to objectively monitor the competitiveness of PJM markets, funded by the members of PJM Interconnection, L.L.C.²
2. The Open Access Transmission Tariff (OATT) of PJM Interconnection, L.L.C., requires that the Market Monitor, among other things, monitor "Compliance with the PJM Market Rules," "Actual or potential design flaws in the PJM Market Rules," Structural problems in the PJM Market that may inhibit a robust and competitive market," and "The potential for a Market Participant to exercise market power or violate any of the PJM Rules."³
3. As these proceedings involve reviews of the establishment of Zero Emission Certificate (ZEC) Programs and approval of associated charges for eligible nuclear power plants operating in the PJM competitive markets, it implicates matters within the Market Monitor's purview.
4. If approved, these proposals could have a substantial impact on competition in the competitive wholesale electric markets administered by PJM Interconnection,

¹ PJM Interconnection, L.L.C. ("PJM") is a Commission-approved Regional Transmission Organization. Capitalized terms used herein and not otherwise defined have the meaning used in the PJM Open Access Transmission Tariff ("OATT") or the PJM ("OA").

² OATT Schedule 9-MMU.

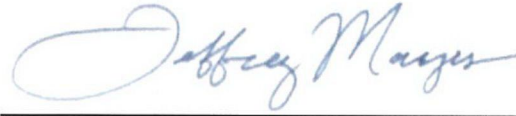
³ OATT Attachment M §§ II & IV.B 1-4.

L.L.C., which may, in turn, have a substantial impact on competition and rates in the retail markets subject to the jurisdiction of this Board.

5. The Market Monitor's interest in the outcome of these proceedings is in protecting the public interest in PJM markets regulated through competition.
6. The Market Monitor has a substantial interest in these proceedings because it has the exclusive duty to perform the market monitoring function for PJM in accordance with the duties required by the PJM Tariff. No other party can adequately represent the Market Monitor's interests.
7. The Market Monitor requests that it be added to the official service lists and that all papers, pleadings, and notices be served on undersigned counsel, Jeffrey W. Mayes.

For the foregoing reasons, the Market Monitor respectfully requests that it be granted leave to intervene in these proceedings as a party for all purposes.

Respectfully submitted,

A handwritten signature in blue ink, reading "Jeffrey Mayes", is positioned above a horizontal line.

Jeffrey W. Mayes
General Counsel
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(610) 271-8053
jeffrey.mayes@monitoringanalytics.com

Dated: October 19, 2018

CERTIFICATE OF SERVICE

I hereby state that I have this day served the foregoing document by hard and electronic copy upon each of the Board, Rate Counsel and the Division of Law, and by electronic copy on the filing companies and other potentially interested parties.

Dated at Eagleville, Pennsylvania,
this 19th day of October, 2018.



Jeffrey W. Mayes
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**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

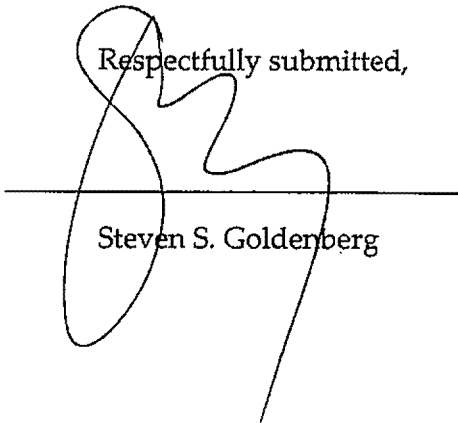
In the Matter of the Implementation of L.)	
2018, c. 16 Regarding the Establishment of a)	Docket No. EO18080899
Zero Emission Certificate Program for Eligible)	
Nuclear Power Plants)	
In the Matter of Public Service and Gas)	Docket No. EO18091004
Company's Request for Approval of a Zero)	
Emission Certificate Recovery Charge)	
In the Matter of Rockland Electric Company's)	Docket No. EO18091005
Filing for Review and Approval of the Zero)	
Emission Certificate Recovery Charge)	
In the Matter of the Application of Atlantic)	Docket No. EO18091003
City Electric Company for Approval to)	
Implement a Zero Emission Certificate)	
("ZEC") Charge and Tariff Pages Related)	
Thereto in Support of the ZEC Program)	
Authorized by N.J.S.A 48:3-87.3 et seq and a)	
Board Order Initiating the ZEC Program)	
Dated 8/29/18)	
In the Matter of Jersey Central Power & Light)	Docket No. EO18091002
Company for Review and Approval of a Zero)	
Emission Certificate Recovery Charge)	

MOTION FOR ADMISSION *PRO HAC VICE*

The undersigned counsel, a member in good standing of the bar of the State of New Jersey and serving as attorney of record in these proceedings, hereby moves for the admission *pro hac vice* of Jeffrey W. Mayes, Esq. Mr. Mayes is a member in good standing admitted to practice in the Commonwealth of Pennsylvania, the Commonwealth of Virginia and the District of Columbia. There is good cause for Mr. Mayes to be admitted *pro hac vice* because he has special expertise developed through his association with Monitoring

Analytics, LLC on issues relating to its obligations as the Independent Market Monitor for PJM Interconnection, LLC. As evidenced by his affidavit attached hereto, Mr. Mayes has paid to the New Jersey Lawyers' Fund for Client Protection the fees required by R. 1:20-1(b).

Respectfully submitted,



Steven S. Goldenberg

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

In the Matter of the Implementation of L.)	
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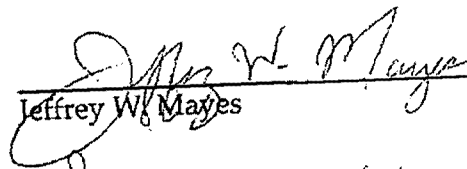
**AFFIDAVIT IN SUPPORT OF
MOTION TO APPEAR
PRO HAC VICE**

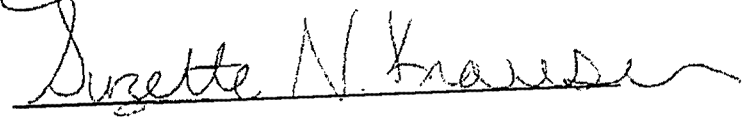
COMMONWEALTH OF PENNSYLVANIA)	
)	ss.
COUNTY OF MONTGOMERY)	

I, JEFFREY W. MAYES, duly sworn according to law, depose and say:

1. I am an attorney in good standing admitted to practice in the Commonwealth of Pennsylvania, the Commonwealth of Virginia and the District of Columbia. I am not admitted to practice law in New Jersey. My office address is 2621 Van Buren Avenue, St. 160, Eagleville, Pennsylvania 19403. My telephone number is (610) 271-8053.
2. I am associated in these matters with New Jersey counsel of record, Steven S. Goldenberg, who is qualified to practice law in this State, pursuant to R. 1:21-1.
3. I am General Counsel for Monitoring Analytics, LLC and will represent Monitoring Analytics, LLC in these matters.
4. I am not now the subject of any pending disciplinary proceedings in any jurisdiction nor have I been disciplined previously in any jurisdiction.
5. There is good cause for my admission *pro hac vice* in that I have special expertise developed through my association with Monitoring Analytics, LLC on issues relating to its obligations as the Independent Market Monitor for PJM Interconnection, LLC.
6. I have paid to the New Jersey Lawyers' Fund for Client Protection and Ethics, Financial Committee the fees required by R. 1:28-2 and R. 1:20-1(b).
7. If this application to appear *pro hac vice* is granted, I agree to:
 - a. Abide by the rules and regulations of the New Jersey Board of Public Utilities ("Board"), the Office of Administrative Law and the New Jersey courts, including all disciplinary rules;
 - b. Consent to the appointment of the Clerk of the Supreme Court as agent upon whom service of process may be made for all actions against me or my firm that may arise out of my participation in this matter;
 - c. Notify the Board immediately of any matter affecting my standing at the bar of any court; and
 - d. Have all pleadings, briefs and other papers filed with the Board signed by the attorney of record.

Sworn to and subscribed
Before me this 17th day
of October, 2018


Jeffrey W. Mayes



Notary Public

