



PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

*State of New Jersey*  
OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF LAW  
PO Box 45029  
Newark, NJ 07101

GURBIR S. GREWAL  
*Attorney General*

MICHELLE L. MILLER  
*Director*

March 1, 2019

**VIA EMAIL ONLY**

Re: In the Matter of the Implementation of L. 2018, c. 16 Regarding the Establishment of a Zero Emission Certification Program for Eligible Nuclear Power Plants  
BPU Docket No. EO18080899

PSEG, Rate Counsel, NJLEUC, IMM, NRG, and P3:

This Office represents the Staff of the New Jersey Board of Public Utilities (“Board Staff”) in the above-referenced matter. Board Staff would like to solicit an answer to the following prompt from all parties and participants:

Please describe how generators bidding into the PJM Energy and Capacity Markets typically cover their operational and market risks. Specifically, please discuss whether these risks are built into pricing bids (as defined by the PJM market guidelines), or assumed by the bidder?

All electronic responses should be provided in portable document format (.pdf) containing a text searchable optical character recognition (OCR) layer.

To the extent your answer to the prompt contains confidential information, please file accordingly. Responding parties must provide their responses no later than close of business on Wednesday March 6, 2019. Thank you.

Very truly yours,

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Peter Van Brunt  
Peter Van Brunt  
Deputy Attorney General

Cc: email list

