MONITORING ANALYTICS, LLC

2621 Van Buren Avenue, Suite 160 Eagleville, PA 19403

BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES

| |) | |
|--|---|------------------------------|
| In the Matter of the Implementation of L. |) | Docket No. EO18080899 |
| 2018, c. 16 Regarding the Establishment of a |) | |
| Zero Emission Certificate Program for |) | |
| Eligible Nuclear Power Plants |) | |
| |) | |

MOTION OF THE INDEPENDENT MARKET MONITOR FOR P.IM

Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor ("Market Monitor") for PJM Interconnection, L.L.C. ("PJM"), submits this request to participate in the review of applications for the second three year eligibility period of the Zero Emission Certificates ("ZECs") program and requests access to information submitted on a confidential basis in this proceeding.

The Market Monitor received confidential information during the prior applications process that it used to prepare an analysis of the applications received in the first three-year eligibility period of the ZEC program. By order issued in this proceeding November 19, 2018, the Board granted the Market Monitor's motion to intervene and request for access to confidential information stating (at 14):

[T]he Board <u>FINDS</u> that the IMM's participation in this proceeding will add measurably and constructively to the scope of this proceeding. Given its unique familiarity, knowledge, and expertise in the functioning of PJM wholesale electric markets, the Board <u>HEREBY FINDS</u> that the IMM's ability to contribute to a complete and thorough review of financial information submitted by applicants would significantly and substantially contribute to the Board's understanding and determination of issues in this proceeding.

The Market Monitor requests the same access to confidential information in this proceeding as granted by the BPU in the prior proceeding in order to prepare and provide

a similar analysis in the review of applications for the second three-year eligibility period of the ZECs program

The Market Monitor respectfully requests that the Board grant this motion.

Respectfully submitted, /s/ Michael J. Ash

Michael J. Ash, CRE, Partner Carlin & Ward

Counsel for the Independent Market Monitor for PJM

Dated: August 26, 2020

CERTIFICATE OF SERVICE

I hereby state that I have this day served the foregoing document by electronic copy upon potentially interested parties.

Dated at Eagleville, Pennsylvania, this 26th day of August, 2020.

Jeffrey W. Mayes General Counsel

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SERVICE LIST