

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**PJM Interconnection, L.L.C.**

**Docket No. ER21-2582-000**

**MOTION TO INTERVENE OF  
THE RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission's ("Commission's") Rules of Practice and Procedure, 18 C.F.R. § 385.214, the Retail Energy Supply Association ("RESA")<sup>1</sup> hereby files this Motion to Intervene in the above-referenced proceeding, in which PJM Interconnection, L.L.C.'s ("PJM") proposes to revise the Minimum Offer Price Rule ("MOPR"). In support of this Motion to Intervene, RESA submits as follows:

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<sup>1</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

**I.**  
**MOTION TO INTERVENE**

**A. Correspondence and Communications**

Correspondence and communications regarding this matter should be addressed to the following person(s), and the same should also be designated for service on the Commission's official list for this proceeding:

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**B. RESA**

RESA is a non-profit trade association of independent corporations that are involved in the competitive supply of electricity. RESA and its members are actively involved in retail electricity markets throughout the United States, including retail markets in each of the Commission-approved RTO/ISOs. Many of RESA's members are active in PJM markets.

**C. Motion to Intervene**

On July 30, 2021, PJM filed to establish a revised MOPR to replace the Expanded MOPR to address buyer-side market power. The proposed changes will be effective for the Base Residual Auction for the 2023/2024 Delivery Year. RESA's members are active in PJM markets and purchase services from PJM. RESA, therefore, has an interest in this proceeding that is not represented by any other party. RESA respectfully requests that its motion to intervene be granted.

WHEREFORE, RESA respectfully requests that its Motion to Intervene be granted.

Respectfully submitted,

*Elizabeth W. Whittle*

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The Retail Energy Supply Association

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Dated: August 16, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document on each person listed on the Official Service list compiled by the Secretary in this proceeding.

Dated in Washington, DC this 16<sup>th</sup> day of August 2021.

Elizabeth W. Whittle  
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