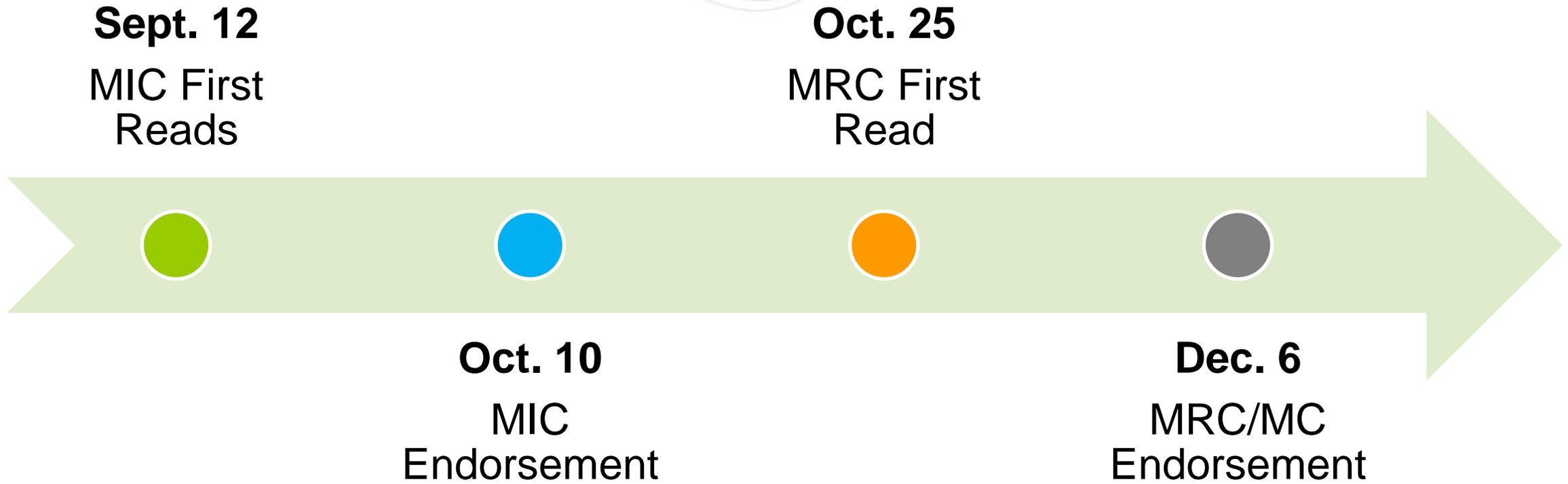




# PJM Proposal for Must-Offer Exception Process Issue

Patrick Bruno  
Sr. Engineer, Capacity Market Operations  
Market Implementation Committee  
October 10, 2018

- Issue brought forward by Exelon to investigate:
  - Possible reforms to the RPM Must-Offer Exception Process for improved efficiency and clarity
  - Process for resources with an existing must-offer requirement to become energy only resources
- Approved at the March MIC and assigned to the MIC





# PJM Proposal

## Process Efficiency

- Participants may include multiple auctions in their written Must-Offer Exception requests submitted to PJM and the IMM
  - For system tracking, a MIRA request is still needed for each auction, but no need to re-submit all the same supporting data/documentation for each subsequent auction
  - PJM and the IMM will still review with each subsequent auction

## Process Clarifications

- Exception requests are not required for resources in an “early replacement”
  - Current rules already prohibit the replaced generator from re-committing those MW for the Delivery Year; no need to also submit a Must-Offer Exception Request
- Timing is an acceptable reason for a CP Must-Offer Exception request
  - A resource that cannot have its project completed in time by the start of the Delivery Year that’s needed to be CP capable is an acceptable reason for a CP Must-Offer Exception request

- Participants may submit a written request to PJM and the IMM, along with all supporting data and documentation, to remove a Generation Capacity Resource from its Capacity Resource status
  - Requests and PJM/IMM review of a Capacity Resource status change will follow the same deadlines of Must-Offer Exceptions related to deactivation for RPM auctions
  - Preliminary and final MWs of units requesting a status change will be included in the posting of Must-Offer Exceptions related to deactivations
- Requests are not permitted for a Delivery Year in which the Generation Capacity Resource holds a capacity commitment

- PJM will run any necessary reliability studies for relinquishment of CIRs by the resource, similar to analyses done for deactivating units
  - e.g. Generator / Load Deliverability Tests
- The IMM will run an economic feasibility test for uncompetitive behavior and market power
- Once approved, the generation unit will no longer be modeled as a Capacity Resource effective with the date of the status change
  - No longer eligible to offer in auctions or take on commitments for the relevant future DYs
- Capacity Interconnection Rights (CIRs) of the resource will be relinquished in a manner consistent with a deactivating unit
  - One year from the effective date of status change if not re-used in queue (Tariff Section 230.3.3)

- A status change to energy only will be required for Existing Generation Capacity Resources that are repeatedly approved for CP Must-Offer Exceptions and not offered in BRAs for 3 consecutive Delivery Years
  - Status change required at start of fourth Delivery Year
- If circumstances change prior to the effective date of the status change that now allows the unit to be a Capacity Performance Resource:
  - No later than 135 days prior to the status change, participants may submit a written request to PJM and the IMM requesting that the unit retain its Capacity Resource status to be offered in an RPM auction
  - Requests must provide supporting data and documentation showing verifiable evidence that the resource can meet the performance requirements of a Capacity Performance Resource by the relevant Delivery Year
  - If PJM grants such request and the Generation Capacity Resource is offered in the applicable RPM auction, the unit shall no longer have its Capacity Resource status removed

# Appendix

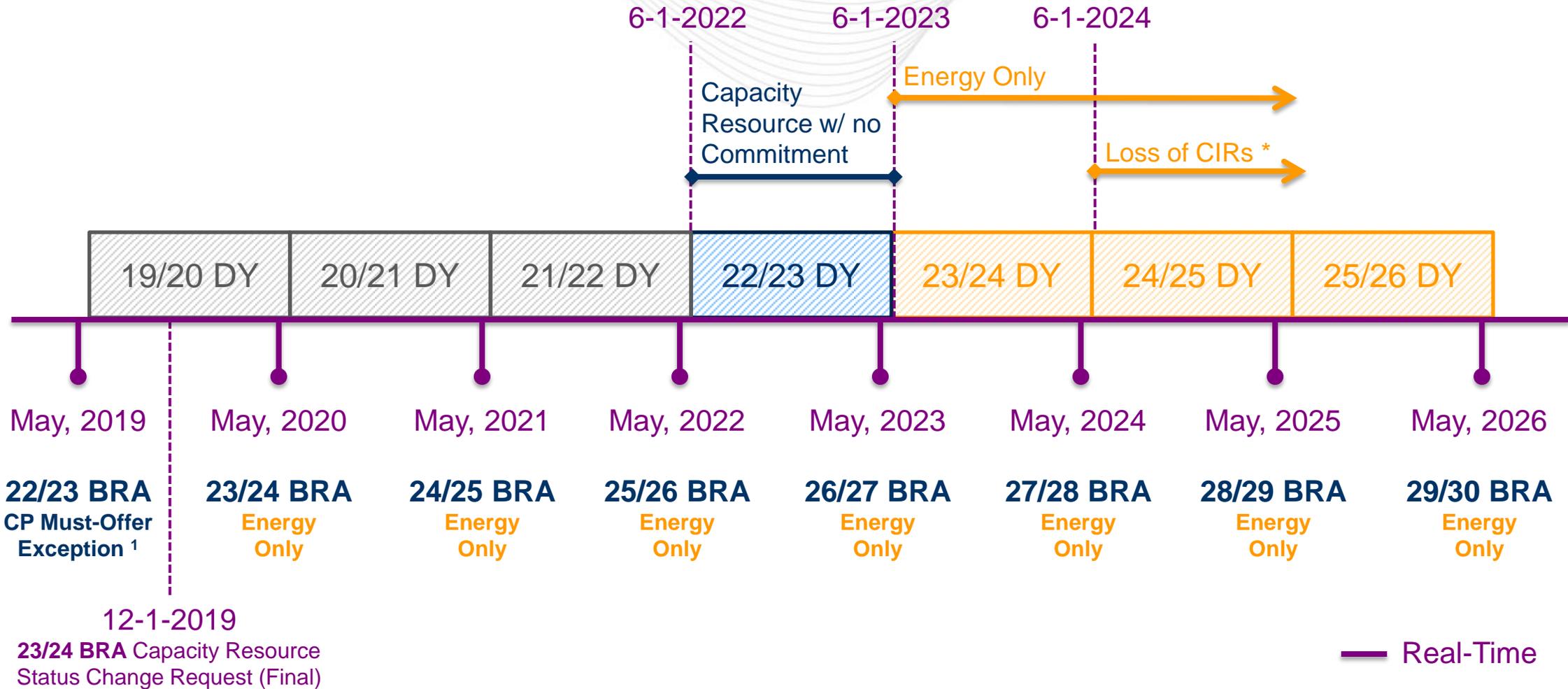


# Capacity Resource Status Change: Deadlines

<b>Activity</b>	<b>Deadline</b>
Preliminary request for Capacity Resource status change	SEPT01 prior to BRA, 240 days prior to IA
Final request for Capacity Resource status change	DEC01 prior to BRA, 120 Days prior to IA
IMM provides determination on status change request	90 days prior to auction
Capacity Market Sellers notify PJM/IMM of agreement with IMM determination on status change request	80 days prior to auction
PJM provides determination on status change request	65 days prior to auction



# Example: Capacity Resource Status Change Request for 23/24 BRA





# Example: Capacity Resource Status Change After 3 CP Must-Offer Exceptions



- Currently, two Must-Offer Exception sections – one that is general and one that is specific to Capacity Performance
- General Must-Offer Exceptions in Tariff, Att. DD, sec. 6.6(g):
  - is reasonably expected to be physically unable to participate in the relevant Delivery Year;
  - has a financially and physically firm commitment to an external sale of its capacity, or
  - was interconnected an Energy Resource and not subsequently converted to a Capacity Resource.

- What does “physically unable to participate” mean?
  - Documented plan to retire during or prior to the DY and has submitted its Deactivation notice to PJM
  - Significant physical operational restrictions cause long term or permanent changes to the installed capacity value of the resource, or the resource is under major repair that will extend into the applicable DY
  - Involved in an ongoing regulatory proceeding specific to the resource (e.g., environmental) and has received an order...or other final directive that will result in the retirement of the resource
  - It is only considered “Existing” because it cleared an RPM Auction, but will not be in-service by the start of the applicable DY

- Under Tariff, Attachment DD, section 6.6A
  - Physically incapable of being a CP resource
    - The review process is the same as under 6.6(g)
  - Intermittents and storage are categorically exempt

Activity	Deadline
Preliminary must-offer exception for reason of deactivation	SEPT01 prior to BRA, 240 days prior to IA
Final must-offer exception for reason of deactivation	DEC01 prior to BRA, 120 Days prior to IA
Must-offer exception for other than deactivation	120 days prior to auction
IMM provides determination on must offer exception	90 days prior to auction
Capacity Market Sellers notify PJM/IMM of agreement with IMM determination on must offer exception	80 days prior to auction
PJM provides determination on must offer exception	65 days prior to auction
Capacity Market Seller notifies PJM/IMM of intent to exercise approved exception	65 days prior to auction

- Obligated to deliver energy during the relevant Delivery Year as scheduled and/or dispatched by PJM during Performance Assessment Intervals
  - PJM Tariff does *not* prescribe specific fuel arrangements or investment requirements needed to meet CP performance obligations

- Under Tariff, Attachment DD, section 6.6A
  - reasonably expected to be physically incapable of satisfying the requirements of a CP Resource
    - The review process and timeline is the same as under 6.6(g)
      - 120 days prior to auction for reasons other than deactivation
  - Intermittent and storage are categorically exempt

- “Physically incapable” includes...
  - Necessary capital improvements, or new fuel delivery infrastructure, that cannot be arranged, permitted, and completed in time for the relevant Delivery Year
- “Physically incapable” does *not* include...
  - Seller’s refusal to make investments, or allocate the operating budget, needed to bring the resource’s performance up to the necessary level
  - Economic feasibility tests