Primary Frequency Response and Other Operational Requirements Inclusion in Wholesale Market Power Agreements (WMPA)

## **Background**

Primary Frequency Response (PFR) is the ability for a resource to automatically response to locally sensed changes in frequency, typically through unit governor action or inverter controls. The Primary Frequency Response Sr. Task Force (PFRSTF) has been discussing the implementation of FERC Order 842 which requires all new generation to provide PFR as a condition of the Interconnection Service Agreement. The PFRSTF is also discussing whether or not similar requirements should be applied to the existing resource fleet.

## Problem

FERC Order 842 clearly specified that the PFR requirements should apply to all new generation or modified generation that executes a new Interconnection Service Agreement (ISA). The question is whether these same PFR requirements should apply to resources participating in PJM's wholesale markets through a Wholesale Market Power Agreement. Currently, other than metering requirements, there are no operational requirements for resources on a WMPA. Other possibilities of operational requirements in addition to PFR for resources on WMPA could include reactive services, voltage and frequency ride-through, power factor control and possible services. The DERS is the most logical forum for stakeholder discussion of these issues.

## **Action Item**

The request of the DERS is to discuss and evaluate:

- Jurisdictional responsibilities and limitations for resources on WMPAs. (Reference FERC Docket # ER06-407-000 and PJM Filing FERC Docket ER17-1835-0000)
- Potential reliability services requirements for resources on WMPAs.
  - Primary Frequency Response
  - Reactive Services
  - Voltage and Frequency Ride-through
  - Others?
- Methods of implementation of reliability requirements on WMPAs under existing PJM governing documents.
- Coordinate with distribution utilities and state commissions on whether reliability services from WMPA projects would conflict with state interconnection agreement and/or distribution system reliability metrics.