

Problem Statement

The DR Operations requirement for mandatory (in 2015) Emergency Load Management Event 30 minute response has created an unintended conflict between obligations to deliver Synchronous Reserves (SR) and Emergency Load Management (ELM). Manual 11 at 4.1 provides that “inflexible” resources such as Demand Response provide synchronous reserves for at least a full hour. With new requirements for Load Management to respond in 30 minutes to an Emergency LM event, a DR resource can receive conflicting instruction from PJM dispatch to maintain demand in order to provide SR at the same time that an ELM event seeks a load curtailment. If an SR event were to be called congruently with an ELM event, the DR resource could be penalized

Prior to the 30 minute notice rule, SR resources could utilize the notification window of one or two hours to make SR capability unavailable, thereby avoiding this conflict.

A resolution to these conflicting obligations should be identified.

Proposed Resolution

Add the following provision to Manual 11 at 4.2.8.:

- Demand Resources that are committed to deliver Synchronous Reserves for a given hour and that are subsequently directed to curtail as an Emergency Load Response resource during the same hour shall not be subject to the penalty provisions of 4.2.12.