

# PJM-IMM Manual 11 Changes Differences

MIC

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# Real-Time Energy Market Mitigation

## Current daily offer implementation

- **Units committed in real time owned by Market Sellers that failed the TPS test are committed on the offer with the lowest dispatch cost as defined in the Operating Agreement Section 6.4.1(g). The determination of the cheaper offer is made at the time of commitment.**

# Real-Time Energy Market Mitigation

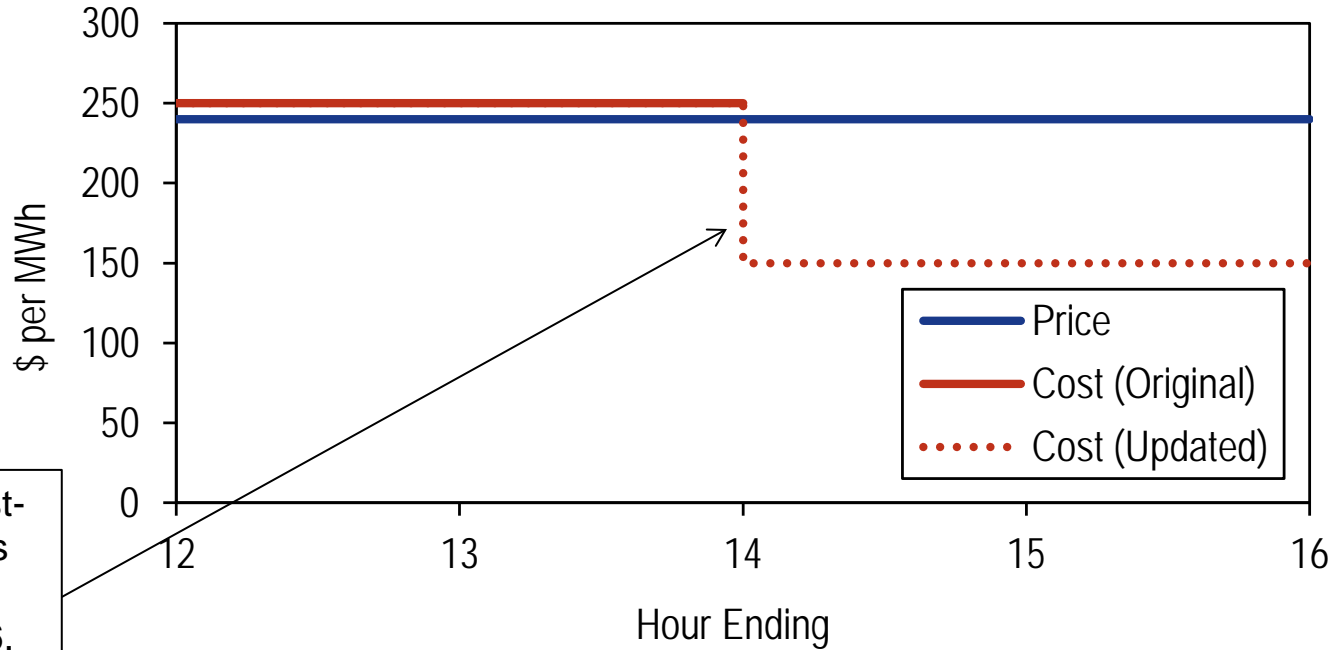
## Intraday offers implementation

- **Market power mitigation should keep up with intraday offer changes.**

# Real-Time Energy Market Mitigation

- **PJM:** The determination of the cheaper offer is made at the time of commitment when the TPS is executed and it will not change regardless of updates to the units' cost-based and/or price-based offers. Offer capping will not be applied independently from the TPS test.
- **IMM:** The determination of the cheaper offer should be verified hourly and updated if the units' cost-based or price-based offer are updated. Market power mitigation should keep up with generator intraday offer updates.

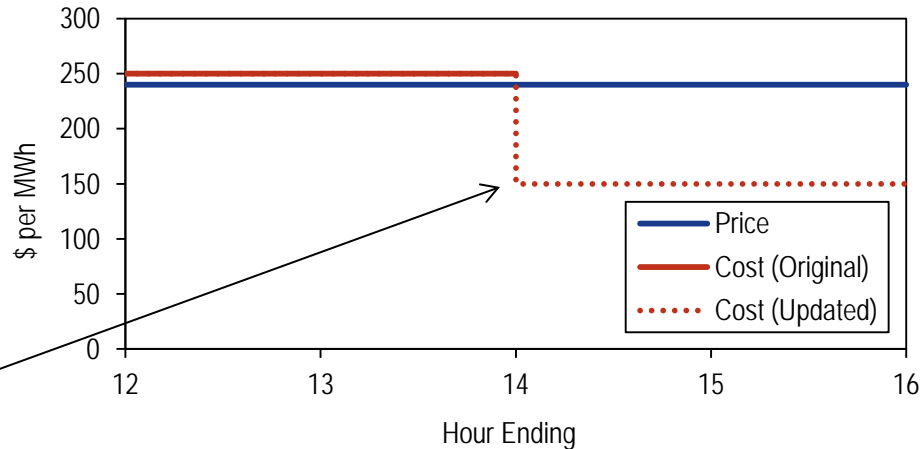
# Scenario



By 1255, cost-based offer is updated for HE15 and 16.

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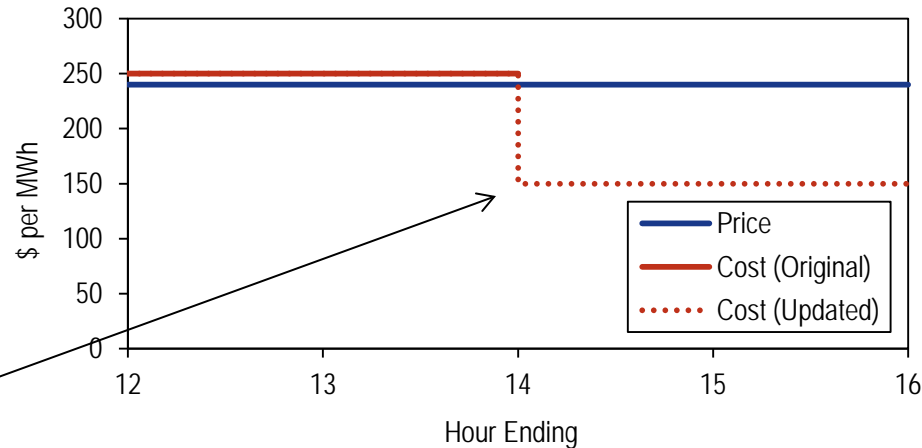
**PJM: The unit will be committed on its price-based offer for its min run time (if committed in RT) because it is lower than the cost-based offer at the time of commitment. Market power is not mitigated in HE 15 and 16 after the intraday update, even when the owner fails the TPS test.**



By 1255, cost-based offer is updated for HE15 and 16.

# Scenario

**IMM: The unit will be committed on its price-based offer for HE 13 and 14 because it is lower than the cost-based offer and it will be dispatched on its cost-based offer for HE 15 and 16 because it is lower than the price-based offer. Market power mitigation will keep up with intraday updates.**



By 1255, cost-based offer is updated for HE15 and 16.

# Day-Ahead Energy Market Mitigation

- **The IMM's proposed changes to Manual 11 only cover units committed in real time.**
- **Units scheduled in the Day-Ahead Energy Market should be addressed with a tariff change.**



# Fuel Cost Policies and Intraday Updates

**As described in section 1.10.9A(b) of the PJM tariff. Market Sellers have to update cost-based offers if:**

- **Required by fuel cost policies.**
- **Market Sellers update price-based offers.**

# Fuel Cost Policies and Intraday Updates

- **PJM:** It is not necessary to link fuel cost policies with intraday updates to price-based offers. Market Sellers will be allowed to keep daily cost-based offers and be allowed to make intraday updates to their price-based offers.
- **IMM:** Market Sellers that wish to update offers (price and/or cost) intraday, have to specify in their fuel cost policies when will both be updated and how the cost-based offer will be updated.

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