

Proposed 30 Minute Reserve Requirement Analysis

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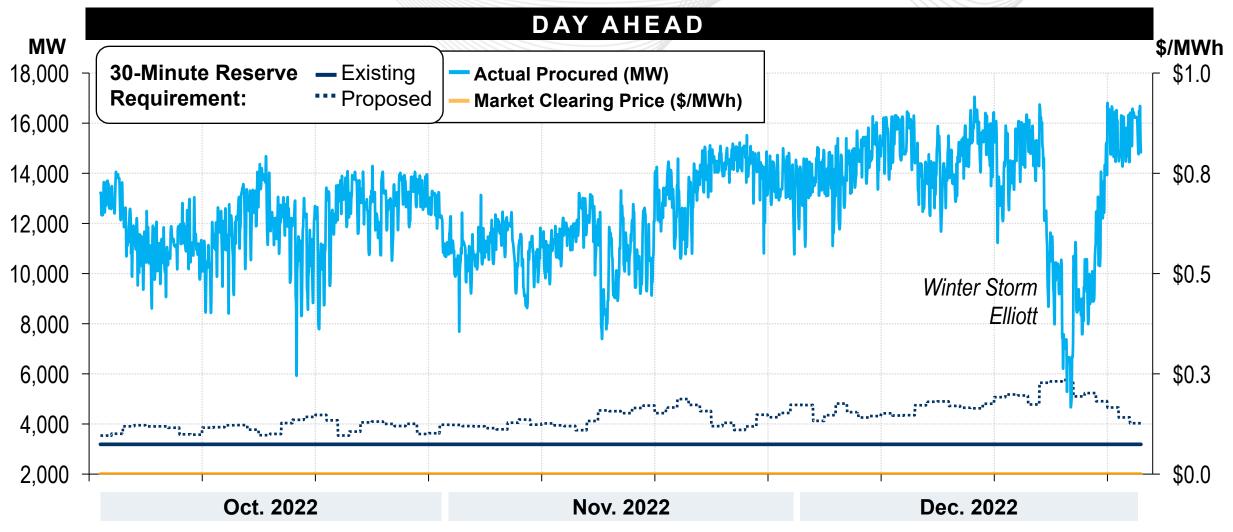


Data Analysis Methodology

- Calculate historical "what-if" 30 min reserve requirement back to 10/1/22 in Real Time and Day Ahead Markets similar to the previously used methodology in the Day Ahead Scheduling Reserve (DASR) market prior to RPF.
 - 30 minute Reliability Requirement: MAX(Load Forecast Peak*(Avg. Load Forecast Error + Avg. Forced Outage Rate), Primary Reliability Reserve Requirement, Largest Active Gas Contingency) *(portion in red would replace current static value of 3000MW)
 - Load Forecast Peak is calculated as maximum zonal sum of forecasted load as seen at time of DA run to be applied for the market day in DA and RT.
 - Avg. Load Forecast Error + Avg. Forced Outage Rate set to 4.3% for 2024
 - Actual existing requirement kept if greater than new calculated value.
 - 190 MW second step added.

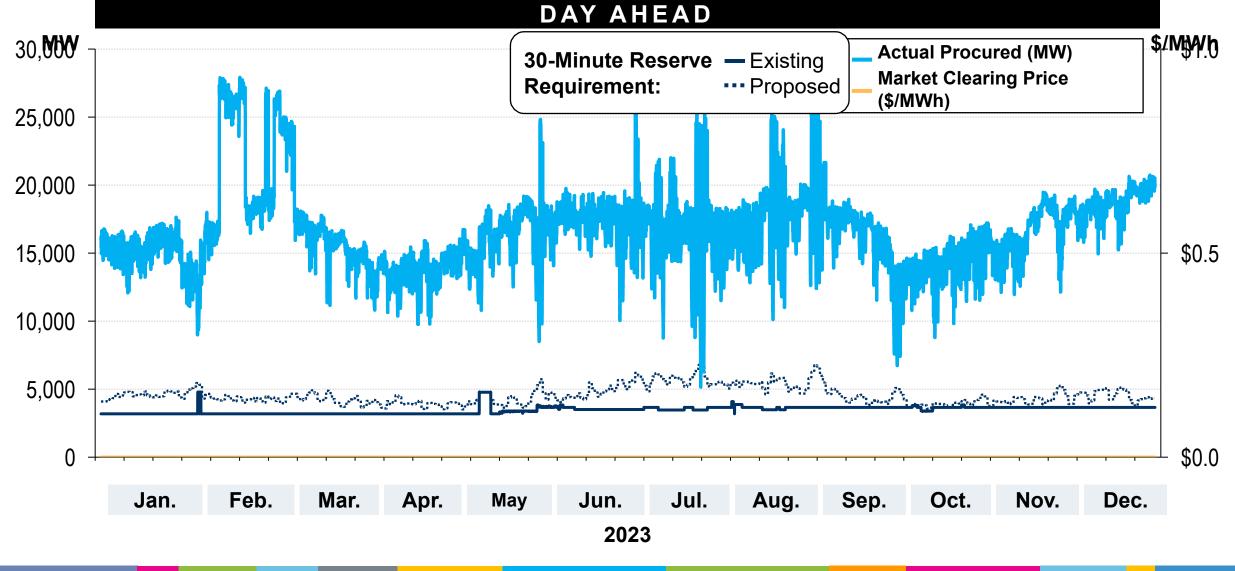


Day Ahead: 2022

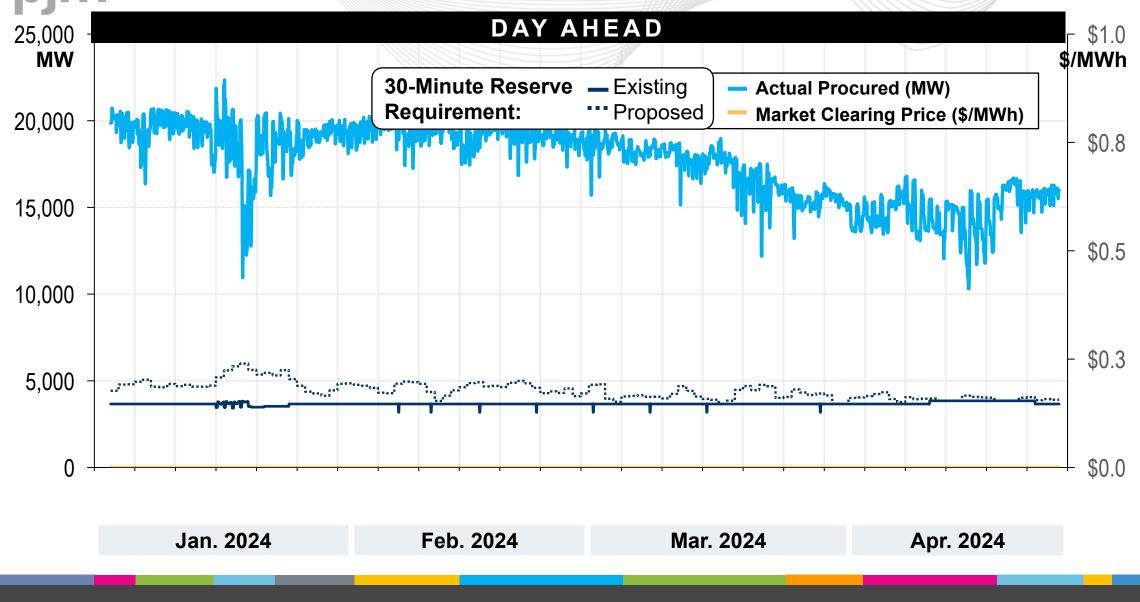




Day Ahead: 2023



Day Ahead: 2024





Day Ahead: Key Notes

- DA SecR clearing price has always been \$0 including during WS Elliott.
- Ample secondary reserves vast majority of the time.
- A few instances of past procurement falling below new requirement during WS Elliott and Summer 2023 which could have led to a nonzero clearing price.
- New calculated requirement added on average ~1100 MW, max 3600 MW.

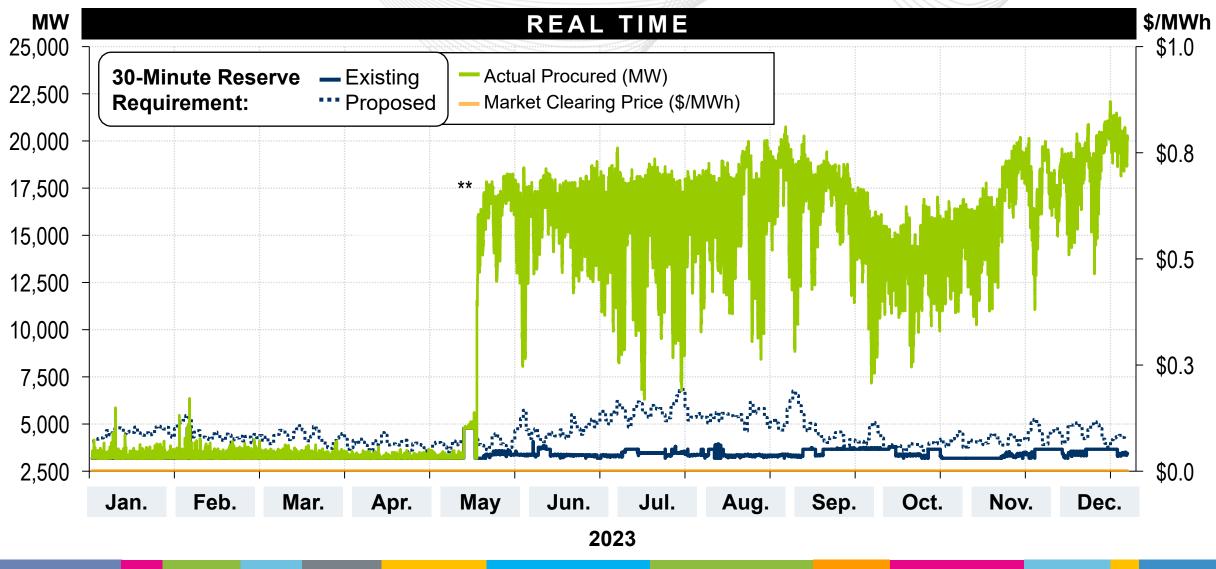


Real Time: 2022

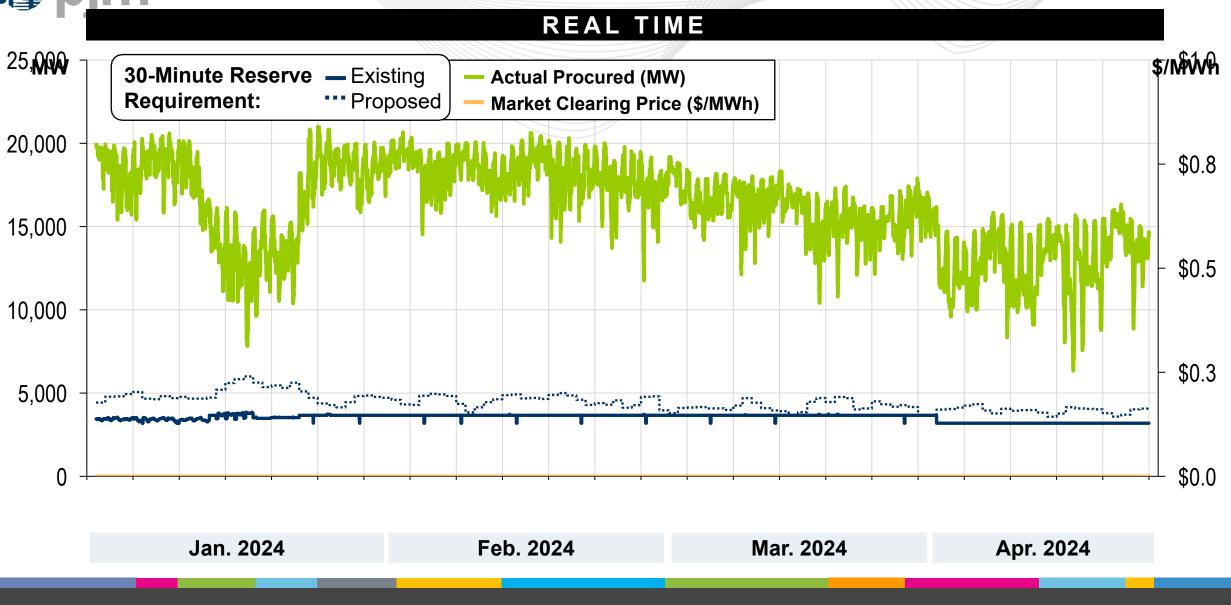




Real Time: 2023



Real Time: 2024





Real Time: Key Notes

- SecR clearing price in RT has always been \$0 except during WS Elliott.
- Ample secondary reserves vast majority of the time with one instance of procurement being below new requirement.
- Change in methodology in May 2023 to align with DA to procure all available SecR with a \$0 clearing price instead of just the requirement.**
- New calculated requirement adds on average ~1100 MW, max ~3600 MW.



Key Takeaways

- Addition of requirement component based on forecasted peak load and error rates align Markets and Operations philosophies of reserve procurement.
- Proposed change does not materially change our usual outcome of a \$0 secondary reserve clearing price and ample reserves, but does provide a higher requirement during peak periods that will ensure more scheduled reserves and better price signals if warranted.





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