

## Pseudo-Ties & Locational Deliverability Area (LDA) Incremental Capacity Transfer Rights

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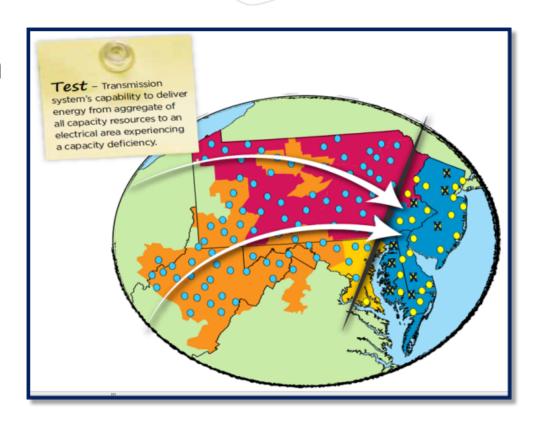
Market Implementation Committee April 2, 2025



- Pseudo-ties are PJM Capacity Resources located outside PJM
  - Resource has an indirect, "virtual" transmission connection PJM
  - Resource holds long-term firm transmission service and has been studied to ensure it is <u>deliverable to PJM</u> with same requirements as an internal PJM Capacity Resource
  - The native balancing authority removes the resource from its calculations to schedule generation, and the PJM adds it to its own
  - Transmission service is not subject to NERC tagging rules, i.e.,
     Transmission Loading Relief

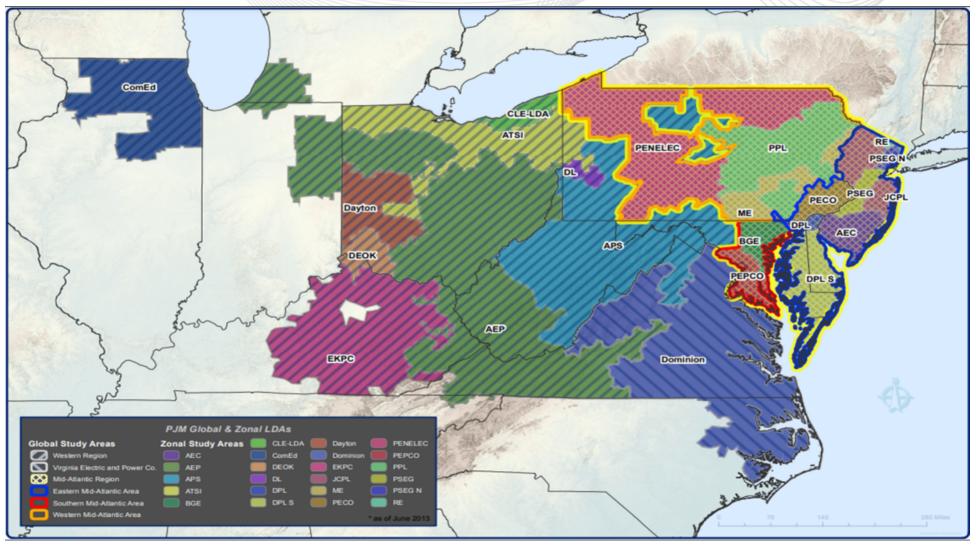


- Study performed to ensure there is minimal transmission risk serving each Locational Deliverability Area (LDA) in PJM.
- Study ensures sufficient transmission capability exists on the PJM system to supply emergency power from the aggregate of PJM generation to LDAs experiencing capacity emergency and high load conditions





## Load Deliverability Background





### Capacity Emergency Transfer Objective (CETO)

 The amount of imports into the LDA from the aggregate of PJM Capacity Resources outside the LDA to achieve a LDA resource adequacy target (previously 1 loss of load event in 25 years and now normalized EUE criterion)

#### Capacity Emergency Transfer Limit (CETL)

- The actual amount of imports into the LDA from the aggregate of PJM Capacity Resources outside the LDA that the PJM transmission system can support
- Both CETO and CETL are <u>agnostic</u> as to which set of PJM Capacity Resources imports come from
- To ensure LDA resource adequacy, CETL >= CETO



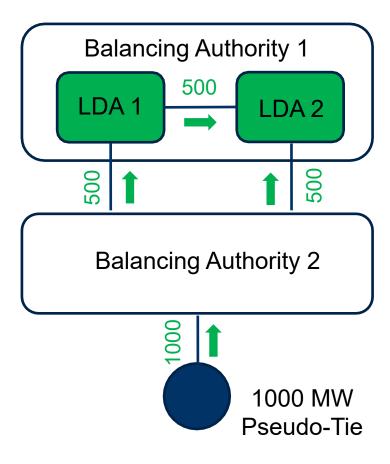
### Concerns With Pseudo-Ties For LDA Emergency Imports

- Like internal <u>PJM</u> Capacity Resources, Pseudo-Ties are deliverable to the PJM footprint and can therefore be counted on to help PJM meet its overall resource adequacy targets.
- Also, like internal <u>PJM</u> Capacity Resources, there is no assessment performed by PJM to ensure that Pseudo-Ties are deliverable to any particular LDA under emergency conditions.
  - In fact, a Pseudo-Tie could be deliverable to PJM as a whole and actually lower the CETL for some LDAs and therefore may even need to be dispatched off to enable the CETO to be achieved.
- PJM will use whatever Capacity Resources are available to supply an LDA with the emergency power it requires, and this may include dispatching some Capacity Resources down or even off.

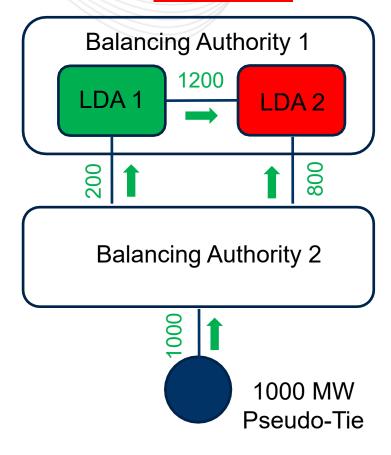


## Example: LDA Emergency Requires Pseudo-Tie Curtailment

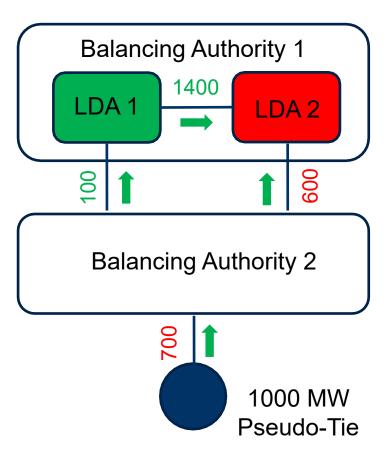
#### **Normal Conditions**



# Emergency Unconstrained Conditions



# **Emergency Constrained Conditions**





## Pseudo-Tie Requirements For LDA Eligibility

- Unlike Capacity Resources inside an LDA, Pseudo-Ties have no impact on the LDA's Reliability Requirement.
  - Reliability Requirement = CETO + Internal ICAP
- Pseudo-Tie must therefore have a direct, physical, dedicated transmission connection to the LDA with a capacity equal to or greater than the Pseudo-Tie in order for it to be considered equivalent to a Capacity Resource inside the LDA.
- Alternatively, a Pseudo-Tie can acquire rights to import capability into the LDA in the amount of the Pseudo-Tie.
  - Incremental Capacity Transfer Rights (ICTRs)
  - Qualifying Transmission Upgrade (QTUs)



## Background On LDA Import Capability Rights

- The rights to the CETL of an LDA are comprised of three components:
  - Capacity Transfer Rights (CTRs)
  - Incremental Capacity Transfer Rights (ICTRs)
  - Qualifying Transmission Upgrades (QTUs)



## Incremental Transfer Capability Rights (ICTRs)

### Described in Attachment H of PJM Manual M14H

- Allocated to developers obligated to fund a transmission upgrade to the extent such upgrade increases the import capability into a LDA, or allocated to a Responsible Customer in accordance with PJM Tariff, Schedule 12A
- Based on the incremental CETL created by the upgrade
- Effective for thirty years or the life of the upgrade, whichever is less



- If there are upgrades required to support the firm transmission service related to the Pseudo-Tie, then such upgrades may be eligible for ICTRs
  - Based on LDA CETL increase
  - Based on how much upgrade cost allocated to Pseudo-Tie
- Alternatively, a merchant transmission or upgrade request can be made to improve the CETL into an LDA and acquire the associated ICTRs.

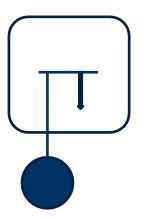


## Three Acceptable Scenarios For LDA Eligible Resources

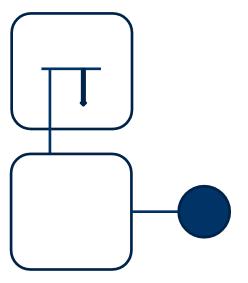
Scenario 1
Capacity Resource
Inside LDA



Scenario 2
Pseudo-Tie With
Dedicated Radial
Connection To LDA



Scenario 3
Pseudo-Tie With
ICTRs & No Dedicated
Connection To LDA





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