

## Problem/Opportunity Statement

### Manuel 11 Quick Fix Regarding Generation Self-Scheduling

#### Problem / Opportunity Statement

Provide addition clarity on the ability of a gas fired resource owner to self-schedule the generation resource at its full MW output during cold weather alerts if the resource owner anticipates that gas supply/transportation will not be available for PJM dispatch unless the resource owner timely schedules these services.

#### References

Tariff Attachment K - Appendix, Section 1.10A(j)(1):

*Market Sellers owning or controlling the output of a Generation Capacity Resource that was committed in an FRR Capacity Plan, self-supplied, offered and cleared in a Base Residual Auction or Incremental Auction, or designated as replacement capacity, as specified in Tariff, Attachment DD, is capable of providing Synchronized Reserve or Non-Synchronized Reserve as specified in section 1.7.19A(a), in section 1.7.19A.01(a) and in the PJM Manuals, and has not been rendered unavailable by a Generator Planned Outage, a Generator Maintenance Outage, or a Generator Forced Outage, shall submit offers or otherwise make their 10-minute reserve capability available to supply Synchronized Reserve or, as applicable, Non-Synchronized Reserve, including any portion that is self-scheduled by the Generating Market Buyer, in an amount equal to the available 10-minute reserve capability of such Generation Capacity Resource.*

*Market Sellers of Generation Capacity Resources subject to this must-offer requirement that do not make the reserve capability of such resources available when such resource is able to operate with a dispatchable range (e.g. through offering a fixed output) will be in violation of this provision.*

PJM Manual 11, Section 4.2.2:

*If a resource that has a reserve must offer requirement chooses not to make its reserve capability available, for example through self-scheduling or offering a fixed output, when the resource is otherwise able to operate with a dispatchable range, the resource is defined to be violating the reserve must offer requirement.*

#### Requested Manual 11 Clarifying Language

ODEC's interpretation of the above provisions is that if a gas fired unit is incapable of providing PJM with this dispatch flexibility because of gas supply/transportation limitations during a cold weather event, but wants to ensure the full MW capability of the generator is available if required by PJM, and is also willing to take on the economic risk

of self-schedule the unit's output at maximum, is not in violation of the reserve must offer requirement.

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