

Self Scheduling Issue Charge

February 19, 2026

■ ODEC's Purpose for the Issue Charge

▪ WHAT IS THE ISSUE

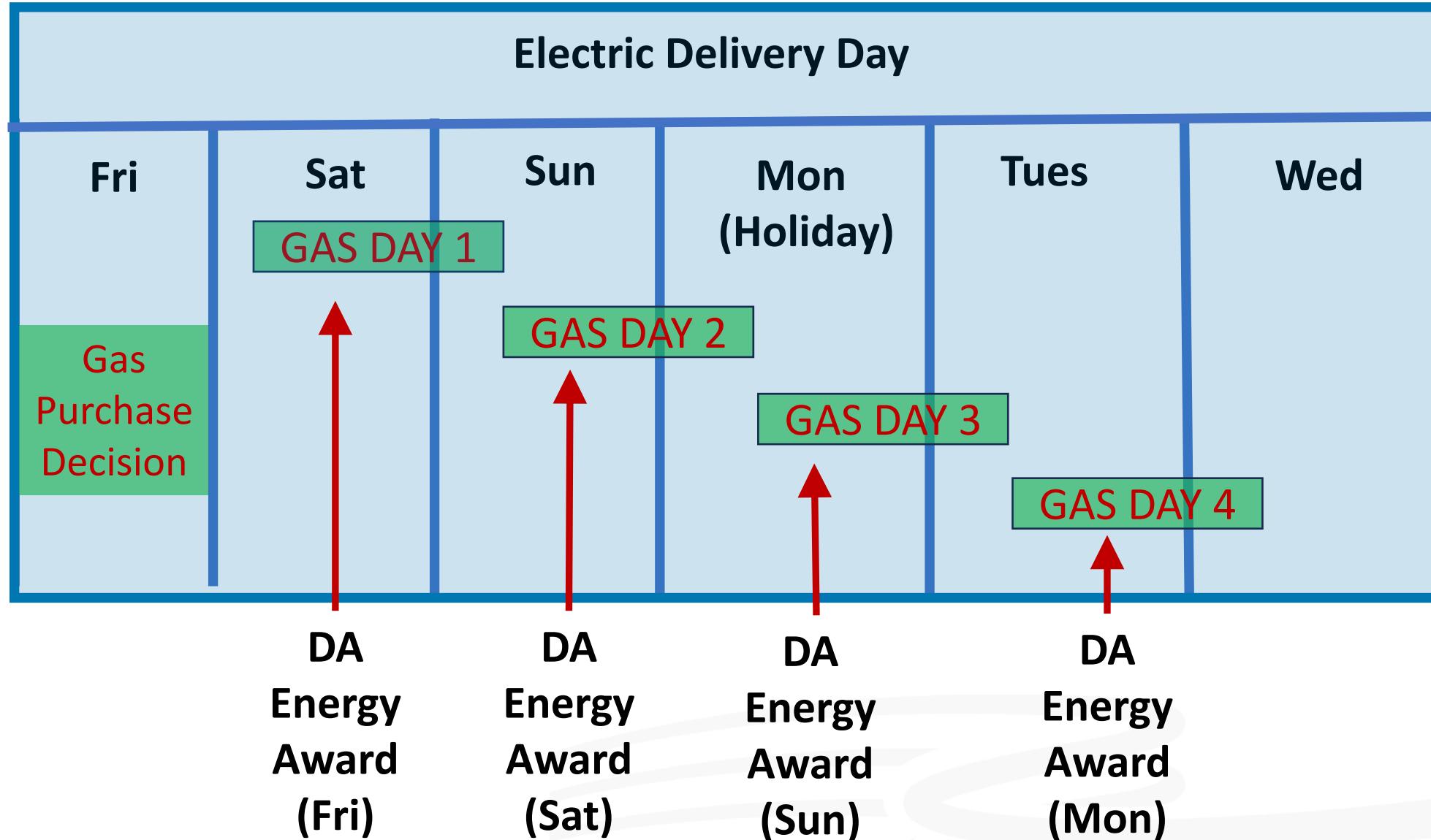
The PJM governing documents are ambiguous with respect to the ability of a generation owner to self-schedule fixed block energy and not be in violation of the Reserve Must Offer Requirement.

ODEC's Concern with the Ambiguity

WHY THE CONCERN

- Gas market business practices may require that a generation owner purchase gas supplies before it knows whether it will receive a PJM energy commitment.
- The gas procurement strategy is necessary during cold events, if the resource owner wants to ensure that the generator can meet its ICAP commitment if called upon by PJM and not be subject to a potential PAI non-compliance penalty.
- Under such circumstances, the resource owner requires assurances they can utilize the “take or pay” gas contracts to produce electric energy by self-scheduling fixed block energy.
- Entirety of the financial risk resides with resource owner as the resource is not eligible for Uplift Payments.

Difficulties Of Multiple Day Gas Packages



■ Additional Concern - Late Market Clearings

- During cold weather events, market clearings in the Day Ahead Market have the potential to be delayed.
 - Example -- For market day 1/29/26, the Day-Ahead market clearing time was approximately 7:15 PM.

PJM Ops Takeaways from FERN



Key Takeaways for Operations

Instantaneous Peak Load 140,049 MW – Jan. 29 @ 08:05

Successes

- Sufficient generation to cover reserves, serve load and exports.
- Close coordination with Generation Owners to effectively managed oil fuel inventory and emissions (Emergency 202c Order No. 202-26-2) to ensure capacity was available during forecasted peaks.
- Close coordination with neighbors throughout the event providing emergency sales as requested.
- Minimal impact on transmission outages due to winter storm effects.

Challenges

- Significant uncertainty and risk resulting from extended severe cold weather across the RTO which impacted gas pipeline flexibility, CWOL, oil fuel inventory, and emission limitations.
- Gas/electric market misalignment resulting in advance commitment prior to the day ahead.
- Load forecast accuracy impacted by actual temperature warmer than forecasted and extended school/government closings.

Proposed OA/Tariff Language (Partial)

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. Notwithstanding the foregoing, a resource owner/operator that purchased natural gas in advance of the Day-ahead Energy market commitment during a cold weather alert would meet the reserve must offer requirement so long as such resource is self-scheduled and produces energy at or above its committed ICAP equivalent of the resources committed UCAP capacity minus any MW quantity that is offered to provide reserves.