

FERC MOPR Order Feedback

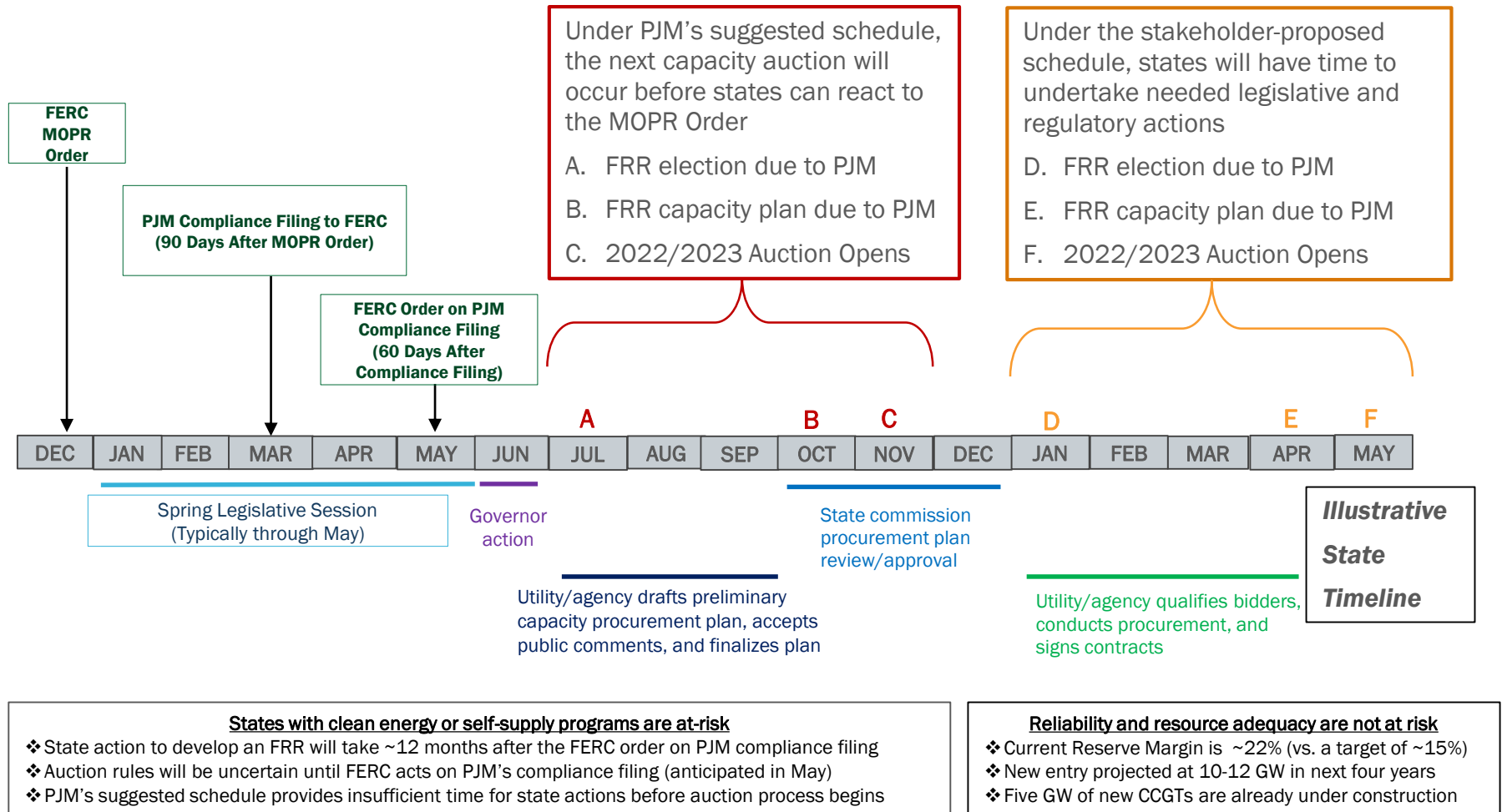
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PJM Market Implementation Committee

January 8, 2020



Some States Will Require a Year to Respond to FERC's MOPR Order



PJM should accommodate all states by scheduling the next auction with reasonable time for legislative/regulatory action to avoid over-payment by consumers under the new MOPR

PJM Feedback

- PJM should set the 2022/23 BRA for ~12 months after the compliance order to provide ample time for states to undertake legislative and regulatory reforms to develop FRRs
- PJM should explicitly map out all actions that qualify and disqualify a resource for a Competitive Exemption, particularly given the new application to existing resources
- PJM’s compliance filing should clarify that renewable resources certifying that sale of RECs to an end-user or intermediary not used for compliance purposes do not subject the resource to the MOPR and that the resource is eligible for a Competitive Exemption (*Compare, Order P. 70 and Order P. 176*)
- PJM’s compliance filing should clarify that established utility DR/EE programs in retail choice states are “existing” resources despite daily customer switching
- PJM’s compliance filing should clarify that RGGI does not confer an actionable subsidy to any resources
- FRR changes are not within the scope of the compliance filing