FERC Order Granting PJM’s Request for Clarification of Order No. 842
Existing generators must continue to provide primary frequency response in accordance with currently-effective RTO and ISO rules.

“Order No. 842 does not relieve existing generating facilities from existing requirements for primary frequency response, including requirements set forth in transmission provider tariffs or business practice manuals, including operating requirements for governors or equivalent controls and/or sustained response.” ([Essential Reliability Servs.](http://example.com), Order on Clarification and Rehearing, 164 FERC P61,135, P 18 (2018) (“Clarification Order”).)
Transmission providers may propose additional primary frequency response requirements to existing generators.

“We also find that nothing in Order No. 842 should be read as barring a transmission provider from proposing additional frequency response requirements under section 205 of the FPA…. Accordingly, we grant PJM's requested clarification that transmission providers have the opportunity through a section 205 filing to propose primary frequency response requirements, including requirements for existing generating facilities.” (Clarification Order at P 20.)
Order No. 842 does not require compensation for existing generators that are capable of providing primary frequency response.

“Finally, with respect to compensation, we agree with PJM that nothing in Order No. 842 mandates compensation to existing generators that are capable of providing primary frequency response. In Order No. 842, the Commission specifically declined to require compensation for primary frequency response, but stated that it would consider proposals for primary frequency response compensation submitted under section 205 of the FPA. Accordingly, we grant PJM's requested clarification that nothing in Order No. 842 mandates compensation to existing generators that are capable of providing primary frequency response.” (Clarification Order at P 22.)