



Poll Results

Capacity Offer Opportunities for Generation with Co-located Load

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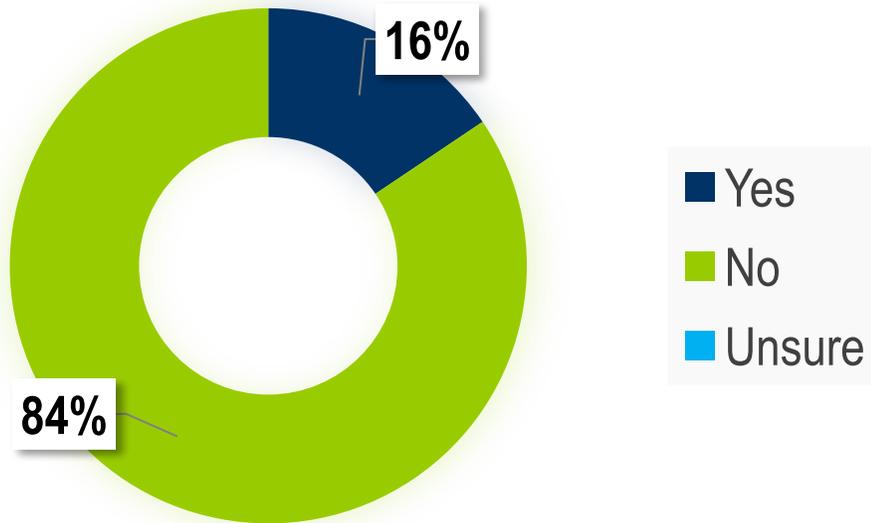
December 7, 2022

MIC

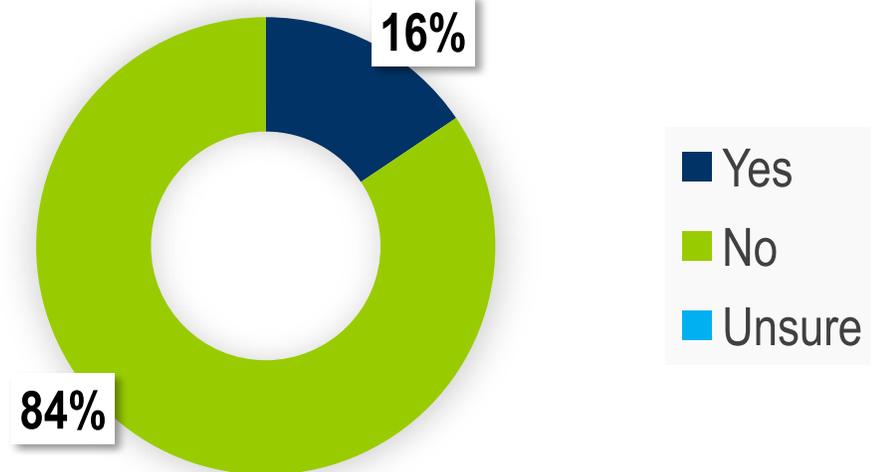
- Held two MIC special sessions since last discussing the topic at the MIC (October 13, November 17)
 - Education on volume of co-located load requests received to date, reliability study process for co-located load, federal / state jurisdictional boundaries
- Two proposals have been offered
 - Constellation / Brookfield: Allows generators hosting co-located load to retain the CIRs associated with serving that load; does not assess additional charges to co-located load
 - IMM: Does not allow generators hosting co-located load to retain the CIRs; assesses additional charges to co-located load
- There has been significant discussion of both proposals. The proposals have not evolved much over the past two meetings. Many positions appear entrenched.

- We conducted an informal poll to gather information on the level of support that currently exists for each package and inform the discussion of next steps within the stakeholder process.
- The poll was open from November 18 through November 29
- 181 members responded (40 voting members, 141 affiliate members)

1. Do you support the Constellation/Brookfield Proposal?



2. Do you prefer the Constellation/Brookfield Proposal over the status quo?



Please explain why you responded as you did for these questions:

1. Do you support the Constellation / Brookfield proposal? (16 comments)
2. Do you prefer the Constellation / Brookfield proposal over the status quo? (7 comments)

Support

- Prevents retirement of generation capacity and associated impacts (increases in capacity prices, decrease in reliability)

Opposition

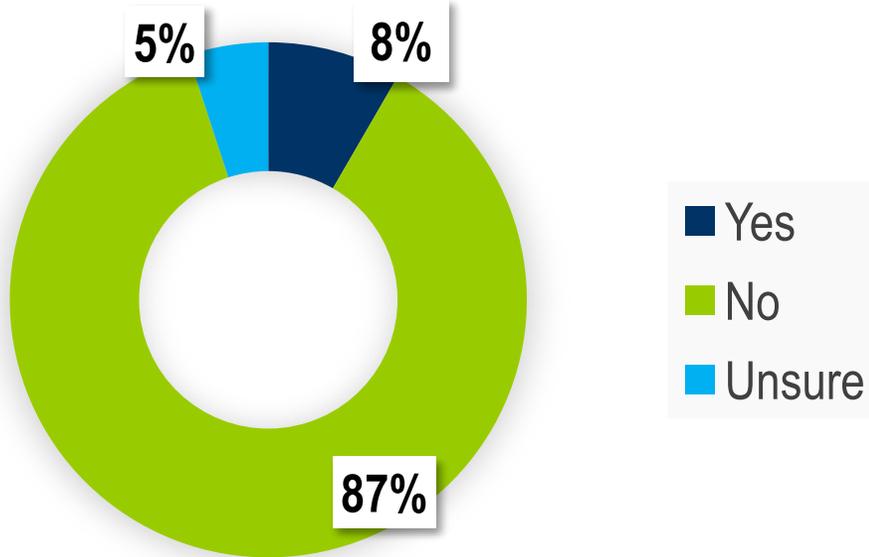
- Concern with avoidance of capacity, transmission and/or ancillary services costs
- View that serving off system load is inconsistent with obligations of a capacity resource / selling capacity twice

Full verbatim comments for all questions are posted with today's meeting materials

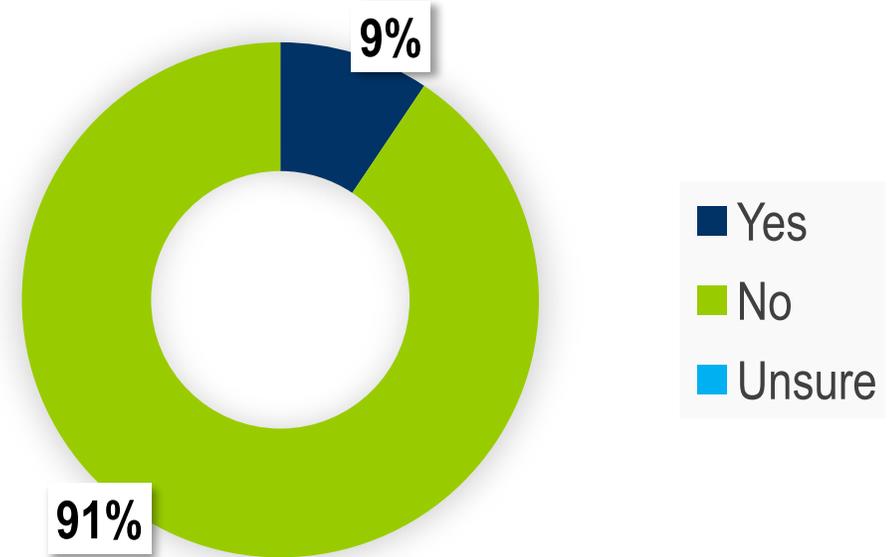
1a. If you answered No to question 1, are there any conditions under which you could support retaining CIRs for co-located load that does not take supply from the system? Please explain. (8 comments provided)

- Seven indicated there were no such conditions
- One offered it could be supported if the benefits derived from reliance on the transmission system were accounted for.

3. Do you support the IMM Proposal?



4. Do you prefer the IMM Proposal over the status quo?



Please explain why you responded as you did for these questions:

3. Do you support the IMM proposal? (13 comments provided)

4. Do you prefer the IMM proposal over the status quo? (8 comments provided)

Support

- Better accounts for the transmission and ancillary services benefits received by co-located load

Opposition

- Proposal needs additional detail, particularly with respect to how cost responsibility will be assigned
- Jurisdictional questions or concerns with ability to implement the proposal
- Concerns around overreach into the area of reliability studies

- There is not significant support for either proposal
 - Opposition to Constellation/Brookfield proposal centers on cost-shifting concerns (may be difficult to resolve due to jurisdictional constraints)
 - Opposition to IMM proposal centers on expansion of IMM responsibilities and whether it can be implemented based on jurisdictional questions
 - Some noted need for more details in order to fully understand it
- Some believe the status quo sufficiently establish the market rules for co-located load; others believe they need clarification.

- Solicit feedback from the MIC on the path forward
 - Continue working the issue charge? If so,
 - in special sessions or at the MIC?
 - What areas do we focus on in order to make progress?
 - Discontinue or pause work on the issue charge?
 - Refocus the work to create more detailed business rules to support the status quo BTMG provisions for co-located load?

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