

IMM's Flawed ComEd FRR Report

PJM Market Implementation Committee

Feb. 5, 2020



The IMM Analyzes Fictional Scenarios Yielding Faulty Conclusions

- The IMM fails to examine any actual proposed legislation that contemplates an FRR
- The IMM makes faulty assumptions
 - Assumes clean and polluting resources will be paid the same
 - IL HB 2861 specifically contemplates procuring clean resources separately from polluting resources
 - FRR rules do not dictate that states require a single price paid to resources with differing attributes
 - The IMM fails to acknowledge consumer protection terms in IL HB 2861 that cap customer charges
 - The IMM excludes all seasonal resource aggregations from the FRR
- The IMM incorrectly suggests a double-payment from both the FRR and ZECs
- The report indicates a continuing intent to influence policy rather than offer objective analysis
 - No one asked the IMM to prepare the report; this should be PJM's role as tariff administrator
 - The IMM has stated that additional reports on FRR will be created for other states

The IMM incorrectly concludes that a ComEd FRR will harm customers