UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C.) Docket No. EL19-100-000
) ER20-584-000

COMMENTS OF THE PJM POWER PROVIDERS GROUP
AND
THE ELECTRIC POWER SUPPLY ASSOCIATION
IN SUPPORT OF MOTION OF PJM INTERCONNECTION, L.L.C.
TO HOLD PROCEEDINGS IN ABEYANCE

Regulatory Commission (“FERC” or “Commission”), the PJM Power Providers Group
(“P3”) and the Electric Power Supply Association (“EPSA”) respectfully file these
comments in support of the Motion of PJM Interconnection, L.L.C. (“PJM”) To Hold
Proceedings in Abeyance And For Shortened Comment Period And Expedited Action,
dated February 27, 2020 (“PJM Motion”), regarding minimum run-time duration
requirements for Capacity Storage Resources (“CSRs”).

1 18 C.F.R. § 385.213.
2 P3 is a non-profit organization that supports the development of properly designed and well-functioning
markets in the PJM region. Combined, P3 members own approximately 65,000 megawatts of generation
assets, produce enough power to supply over 50 million homes in the PJM region covering 13 states and
the District of Columbia. For more information on P3, visit www.p3powergroup.com. The comments
contained in this filing represent the position of P3 as an organization, but not necessarily the views of any
particular member with respect to any issue.
3 EPSA is the national trade association representing leading competitive power suppliers in the U.S.
EPSA members provide reliable and competitively priced electricity from environmentally responsible
facilities using a diverse mix of fuels and technologies. EPSA seeks to bring the benefits of competition to
all power customers. This pleading represents the position of EPSA as an organization, but not necessarily
the views of any particular member with respect to any issue.
PJM requests that the Commission hold the above-captioned proceedings in abeyance until January 29, 2021, in order to pursue an Effective Load Carrying Capability (“ELCC”) construct with PJM stakeholders for calculating the capability of resources, such as Energy Storage Resources (“ESRs”), in the PJM Reliability Pricing Model (“RPM”). PJM states that the abeyance will provide the requisite time for a PJM stakeholder process to develop an ELCC construct, which could potentially address the issues identified by the Commission in the October 17 Order initiating these proceedings. PJM also requests a shortened comment period of four (4) days, and expedited action on PJM’s Motion by the Commission by no later than March 9, 2020.

P3 and EPSA have been actively participating in these proceedings regarding, in general, the operation of ESRs in PJM’s wholesale markets, and, more specifically, the minimum run-time rules and procedures for all CSRs, including ESRs. Both P3 and EPSA appreciate that, to date, PJM has “openly engaged with stakeholders so as to better understand their perspectives regarding the existing qualification requirements for Capacity Resources.” P3 and EPSA support PJM’s willingness to take this stakeholder engagement a significant step forward by initiating a new stakeholder process that would involve a new problem statement and issue charge to be considered during the upcoming March 26, 2020 meeting of the PJM Markets and Reliability Committee (“MRC”), in order to more fully consider using the ELCC construct for certain CSRs. P3 and EPSA condition their support, however, upon the assumption that the status quo regarding the current 10-hour minimum run-time for ESRs will remain in effect during the duration of the new PJM stakeholder process.
Moreover, it is imperative that PJM’s ELCC process yield a result that does not continue the discrimination among capacity resources that currently exists within the PJM framework. For capacity markets to work as intended and provide reliable capacity at the lowest prices, capacity resources must be able to compete on a level playing with all other resources and have similar minimum run requirements. Therefore, as a condition of the Commission’s approval to hold this proceeding in abeyance, the Commission should require that any ELCC outcome from the PJM stakeholder process be premised on the principle that PJM should not have a capacity construct that discriminates among capacity resources. By providing this condition before the stakeholder process commences, the Commission can guide the stakeholder discussion in the direction of a sustainable outcome.

Therefore, P3 and EPSA support the PJM Motion to hold these proceedings in abeyance until January 29, 2021, in order to conduct new stakeholder proceedings regarding the ELCC construct provided the Commission conditions the approval as noted above.

Respectfully submitted,

On behalf of the PJM Power Providers Group

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March 11, 2020

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5 PJM Motion, p. 3.
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 11th day of March, 2020.

On behalf of the PJM Power Providers Group

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