# **Parameter Limited Schedules**

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# Background

- Parameter limited schedules (PLS) were implemented for cost-based schedules and pricebased schedules during emergencies on December 1, 2008.
- Units are placed on the lowest cost schedule when they fail the TPS test, which incorporates their parameter limits.
- Units with physical limitations are able to submit exceptions to the Market Monitor on both a longterm and daily basis if they cannot adhere to the PLS matrix.



### **Consensus Items**

- Issue 1: Units offer extended minimum down times to avoid being turned off when not economic.
- PLS reviews are currently twice a year.
- Daily exception process needs to be modified.
- Sub-critical coal parameters may reflect prior operating conditions that are no longer relevant.



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#### At Issue Items

- Issue 2: Units offer more flexible parameters on price schedule than the PLS values required for cost schedules.
- PLS parameters for Medium-Large and Large Frame CT Unit parameters are less flexible than actual operating experience.



# **Issue 1**

- Currently, a unit may extend a minimum down time to avoid being turned off when not economic.
- The result:
  - Force PJM to run the unit when it is not economic
  - Reduce prices for other generating units as a result of increased, uneconomic supply
  - Increase operating reserve credits to the unit and operating reserve charges paid by other participants.



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### **Issue 1: Proposed Solution**

- Recommend that PJM look further ahead (3-4 days) in order to schedule base-load units that do not cycle economically.
- Consensus solution: PJM dispatch tool should be more forward looking in order to better capture operation of baseload units that were not designed to cycle daily.
- Acceptable outcomes:
  - PJM tells unit on Friday that it is not needed until Monday morning
  - PJM tells unit on Friday that it is needed each day over the weekend





### Issue 2

- Currently, a unit may offer more flexible parameters on price schedules than the PLS values required for cost schedules
- For example, a unit may offer a 4 hour minimum run time on a price schedule and a 5 hour minimum run time on a cost schedule.
- This indicates that the unit does not offer its actual physical level of parameter flexibility on its cost-based schedules.
- The result, if PJM selects cost based offer:
  - Higher market prices.
  - Increased operating reserve credits to the unit and increased operating reserve charges to other participants.





### Issue 2

- Unit offering more flexible parameters on price schedule is able to circumvent TPS test
- Unit offers 4 hour minimum run time on price, and 5 hour minimum run time on cost schedule.
- The result, if PJM selects cost-based offer:
  - Higher market prices
  - Increased operating reserve credits to unit and increased operating reserve charges to other participants





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### **TPS** Issue

- Creates issue with Three-Pivotal Supplier test
- Total cost to market is greater when cost schedule is chosen, due to shorter MRT parameter on price based schedule.
- Issue caused by interaction between scheduling decisions and TPS test parameters.





### **Issue 2 Proposed Solution**

- Additional clause in M11 rules
- At "2.3.4 Minimum Generator Operating Parameters – Parameter Limited Schedules", new clause inserted:
  - For all offer parameters, the Parameter-Limited Schedule shall be the less limiting of (a) the defined Parameter-Limited Schedule or (b) the submitted offer parameters for any schedule

### **Additional Issues Proposed Solutions**

- Daily exceptions: Maximum of seven days with same exception during the year.
- Update Medium-Large and Large Frame CTs parameters to more accurately reflect operations.

# Additional Issues: Consensus Proposed Solutions

- PLS approval process should be annual, rather than biannual, as it is not necessary to review biannually.
- Exceptions approved based on 2006 offer data, and certain other exceptions, can be approved for a longer term than annual
- Update sub-critical coal minimum down time and maximum weekly start parameters in order more accurately reflect operations.
- The same daily exception may be renewable for a maximum of 30 days, after which the exception must be approved through the annual exception process.



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