

to tariff language stating that a generator forced outage is "an immediate reduction in output or capacity or removal from service, in whole or in part, of a generating unit by reason of an Emergency or threatened Emergency, unanticipated failure, or other cause beyond the control of the owner or operator of the facility, as specified in the relevant portions of the PJM Manuals."⁴ PJM fails to identify the service that the ESR is available to provide if it is out of charge.

PJM does not include the more detailed definition of a forced outage from the OATT:⁵

A Generation Capacity Resource committed to PJM loads through an RPM Auction, FRR Capacity Plan, or by designation as a replacement resource under Attachment DD of the PJM Tariff, that does not deliver all or part of its scheduled energy shall be deemed to have experienced a Generator Forced Outage with respect to such undelivered energy, in accordance with standards and procedures for full and partial Generator Forced Outages specified in the Reliability Assurance Agreement, and the PJM Manuals.

PJM's answer is incorrect. PJM's interpretation of the outage rules would allow a battery to discharge its entire ten hour capacity in one hour, and in the following hour be unavailable to follow PJM's dispatch instruction due to lack of charge, and incur no impact on its EFORd. This is not consistent with PJM's treatment of units that are unavailable due to economic decisions, such as a lack of fuel, an interruption due to lack of gas supply, or do not have staff available to start a unit at the time of a call.

PJM market rules currently require that generators submit forced outage tickets when they are not available and the outage (the lack of availability) is not due to a

⁴ OATT § 1, Definitions–G-H.

⁵ OATT § 1.9.4

Generator Maintenance Outage or a Generator Planned Outage.⁶ For example, generators submit forced outages for lack of fuel or lack of staff at the plant site. If there is demand on the unit to generate when out of fuel or for lack of staff, the outage or derate is used to calculate the Equivalent Demand Forced Outage Rate (EFORd). Similarly, an ESR that is out of charge and is not available to be scheduled by PJM should be considered on outage (unavailable) and should be required to submit a forced outage ticket. While the codes in GADS differentiate between lack of fuel outages that are outside management control (OMC) and outages that are in management control, the calculation of EFORd in the PJM capacity market appropriately does not. Lack of fuel outages, whether they are outside management control (OMC) or not, are included in the calculation of EFORd. PJM Manual 18 states:⁷

Effective with the 2018/2019 Delivery Year, the EFORd based on forced outage data from an October through September period prior to the Delivery Year will be based on all forced outage data and not exclude forced outage data for Outside Management Control events.

When an ESR is out of charge due to the resource owner's operating decisions, it should be considered on an outage if it is unavailable for PJM dispatch. PJM's alternate interpretation of Generator Forced Outages is inconsistent with its own Capacity Performance market rules.

⁶ PJM Manual 18: PJM Capacity Market, Section 4.2.5 Equivalent Demand Forced Outage Rate (EFORd), Rev. 41 (January 1, 2019) ("PJM Manual 18") at 68).

⁷ See PJM Manual 18.

The Market Monitor respectfully requests that the Commission afford due consideration to these comments as it resolves the issues raised in this proceeding.

Respectfully submitted,



Jeffrey W. Mayes

Joseph E. Bowring
Independent Market Monitor for PJM
President
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8051
joseph.bowring@monitoringanalytics.com

General Counsel
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8053
jeffrey.mayes@monitoringanalytics.com

Howard J. Haas
Chief Economist
Monitoring Analytics, LLC
2621 Van Buren Avenue, Suite 160
Eagleville, Pennsylvania 19403
(610) 271-8054
howard.haas@monitoringanalytics.com

Dated: May 22, 2019

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 Eagleville, Pennsylvania,
this 22nd day of May, 2019.



Jeffrey W. Mayes

General Counsel

Monitoring Analytics, LLC

2621 Van Buren Avenue, Suite 160

Eagleville, Pennsylvania 19403

(610) 271-8053

Jeffrey.mayes@monitoringanalytics.com