

Performance Assessment Hour Ramp Rate – IMM Position

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PAH Ramp Rate Proposal

- **Weakenes the ‘no excuse’ policy for performance of Capacity Performance resources**
- **Directly against the Commission’s determination on excusing non-performance due to any operating parameter**
- **Alleged problem of excessive self-scheduling is not supported**
- **If resources self-schedule in anticipation of PAH, PAH would not be triggered**
- **During capacity shortage, most of the available capacity is expected to be producing energy or providing reserves**

Actual Performance

- **Actual Performance includes energy output and any reserve and regulation assignment**
- **PJM's examples ignore reserve and regulation assignment used in Performance Shortfall calculation**
- **Resources can also self-schedule reserves and regulation, in addition to energy**

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