Gas Electric Coordination Issues

EGCSTF April 20, 2022 **IMM**



Scope and Focus

- Important to focus on issues related to gas electric coordination.
- Reflect pipeline restrictions in unit availability.
 - Enforce accurate outage and/or derating reporting if nominations not possible or limited.
 - Will ensure PJM's reserve estimates are accurate.
 - Appropriately values resources across technologies.
- Customers not responsible for economic decisions to not procure firm transportation.
 - Generators should bear the risk for these decisions.
 - Fundamental principle of a market based construct.

Scope and Focus

- PJM's market design objective is not to insure gas generators against fuel procurement risk.
- Efficiency and reliability of fuel procurement is one of the elements that generators compete on.
 - Decisions to add dual fuel capability and manage its security are some of the solutions to operate reliably.
 - Compensating for unused gas damages competition.
 - Multiday commitments prior to day-ahead damage competition.
- Resource accreditation, capacity market issues being discussed at Planning Committee, RASTF.

Practical Considerations

- The matrix has a number of items that are not valid design components.
 - Certain components are statements of opinion of a particular entity, do not apply to all gas generators.
- A particular participant's (or a group of participants') desired outcomes are solution options, not design components.
- Scope of certain items is beyond gas electric coordination, or PJM's authority, for example:
 - 19: Long term viability of peaking units (or any units).
 - 21: Use of intermittent generation forecast error in reserve demand curves (FERC reversed ORDC order).
 - 17: Identifying gas capacity needed to meet power demand.

Other Issues

- Market design appropriately assigns risk of decisions on how to operate generation to market sellers.
 - This includes siting, fuel procurement, decisions to add dual fuel capability, subscribe to transportation service.
- ERCOT events do not demonstrate the flaws of PJM market design.
 - Gas market power issues should not drive power market design changes.
- Lack of flexibility in gas market should not be transferred to power market.
- Power market should incent developing gas supply flexibility.
- Power market should incent increased gas market transparency.

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