



Comments on CSP₁

MIC September 11, 2019

Bruce Campbell – CPower

Dave Mabry – PJM ICC

Consensus?

Polling results – 123 respondents

- 92% can support CSP₁ – Does this sound like consensus?
 - Next highest is CSP₂ with 66%
- Challenge: how to “compromise” by changing elements that fewer participants support?

Is Performance an Issue?

- Historical Event performance is at 97% of commitment (2010-2014)
- Test performance substantially exceeds commitment – and is improving:
 - Average test performance for 2009-2013 was 116% of commitment
 - Average test performance for 2014-2018 was 148% of commitment

Customer and Consumer Interests

- Longer tests and reduced notice increase costs for participants.
 - Will this increased cost result in increased reliability for the same cost to load?
 - Will this increased cost result in decreased costs for the same reliability to load?
- CSP₁ accomplishes interests:
 - Seasonal variation in testing
 - Avoids uplift payments
 - Avoids unnecessary tests
 - Addresses LM Compensation by not paying LMP but allowing CSP scheduling.
 - Maintains existing participation risk profile



Questions?

Bruce Campbell

Bruce.Campbell@cpowerenergymanagement.com

202-360-4371

Dave Mabry

DMabry@mcneeslaw.com

717-237-5334