

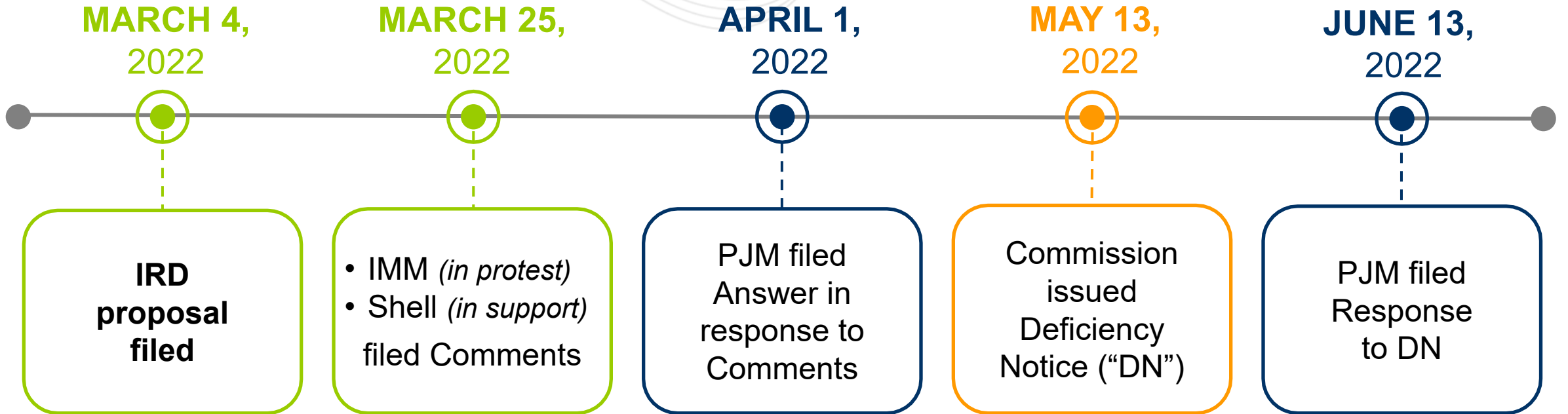


# Intelligent Reserve Deployment (“IRD”) 2022 FERC RECAP

Chen Lu, Assistant General Counsel

Synchronous Reserve Deployment Task  
Force

November 14, 2022



**JULY 5,**  
2022

- IMM and ICC  
*(in protest)*
- Shell *(in support)*  
filed Comments in  
response to PJM's  
DN Response

**JULY 20,**  
2022

PJM filed  
Answer in response  
to Comments

**AUG. 15,**  
2022

FERC Order issued  
finding IRD proposal  
unjust and  
unreasonable

IRD proposal is unjust and unreasonable as it fails to model actual system conditions and is likely to result in artificially inflated prices.

Could result in misalignment between prices and actual system conditions.

Even when a contingency event is the result of the largest contingency, the IRD case might not be representative of actual system conditions if the contingency event occurs near a constraint or within a reserve sub-zone, because IRD would model an RTO-level increase in load.

Inaccurate dispatch may not alleviate a contingency, and IRD would fail to achieve its stated purpose (system recovery from a contingency).

Commission's findings do not preclude PJM from proposing future improvements (better alignment of prices with actual emergency conditions) to the current all-call approach.

**IRD will not result  
in the least-cost  
solution.**

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