

DR EDC review process and Order 2222 consideration

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- DR allows any technology that modifies load "behind the retail meter" to participate in wholesale markets
 - Air conditioning cycle, emergency generator, battery, industrial process curtailment, etc.
- EDC defined as member that manages the distribution system and the underlying retail customers
 - Another member may represent the EDC if the EDC is not a member
- EDC's play an integrated role in DR participation process
- PJM uses EDC account number to identify and track individual customer locations across all parties to help with administration



EDC focus DR (status quo)

Registration

Market
Offer/Dispatch

Settlement & Compliance

EDC focus DER (2222)

DR modifies load and therefore does not go through the interconnection queue



EDC role during the DR registration process (status quo)

- Implement RERRA restrictions or qualifications to market participation
 - EDC provides RERRA evidence
- EDC verifies the following information for each location on the registration:
 - Transmission Zone
 - EDC account number associated with address
 - Energy Pricing Point based on retail settlement (typically residual zonal aggregate)
 - Peak Load Contribution (PLC)
 - EDC Interval meter (as needed)
 - Loss Factors

EDC may approve or reject registration if data in inaccurate.



Wholesale market participation by DR may be impacted by Relevant Electric Retail Regulatory Authority (RERRA) Restrictions

- If EDC is large (>4 million MWh) then DR may participate in wholesale markets unless there is RERRA evidence that prohibits or qualifies participation.
 - Opt Out no action by RERRA means DR may participate
- If EDC is small (=<4 million MWh) then DR may not participate in wholesale markets unless there is RERRA evidence that allows participation.
 - Opt In no action by RERRA means DR may not participate
 - Municipalities and cooperatives typically fit in this category

Reference:

EDCs by Zone by State by RERRA Size:

https://www.pjm.com/-/media/etools/dr-hub/elrs-large-and-small-edcs.ashx?la=en

RERRAs that Prohibit, Permit or Condition Retail Participation in PJM Demand Response Programs:

https://www.pjm.com/-/media/etools/dr-hub/opt-in-opt-out-rerra-evidence-for-dsr.ashx?la=en



Additional EDC coordination based on Order 2222 (Registration – market entry process)

Work in Progress

- each proposed distributed energy resource is capable of participation in a distributed energy resource aggregation; and
- the participation of each proposed distributed energy resource in a distributed energy resource
 aggregation will not pose significant risks to the reliable and safe operation of the distribution system.
 - EDC may request PJM to impose operational limitations for specific resources on case by case basis
- Additional information necessary for the EDC review
 - This may include specifics (e.g. generator type, etc.) on DER that will participate.
- Review process should be less than 60 days
- EDC will not directly decide if DER may participate in the wholesale market but is subject to interconnection process, as required.

Must be transparent review process that does not create a barrier to entry



Additional EDC DR review (status quo)

- Market Offer/Dispatch
 - EDC is not involved in this process
- Settlement & Compliance
 - EDC may review load data and associated line losses (energy and capacity market) prior to energy settlement or capacity compliance
 - PJM determines the load reduction amounts.



Additional EDC coordination based on Order 2222 (Market Offer/Dispatch and Settlement/Compliance)

Work in Progress

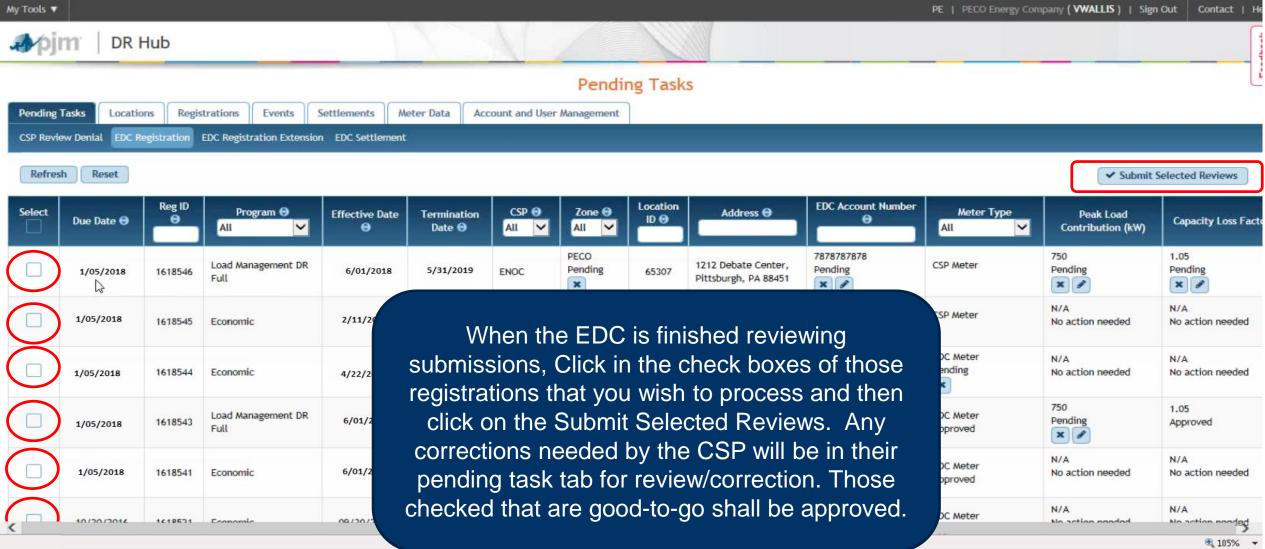
- establish a process for operational coordination, between PJM, EDC and DER aggregator
- require the DER aggregator to report to the RTO/ISO any changes to its offered quantity and related distribution factors that result from distribution line faults or outages.
- coordination protocols for the operating day that allow distribution utilities to override RTO/ISO dispatch of a distributed energy resource aggregation in circumstances where such override is needed to maintain the reliable and safe operation of the distribution system.



- DR Hub screen shot of EDC registration review process
- RERRA review process flowcharts

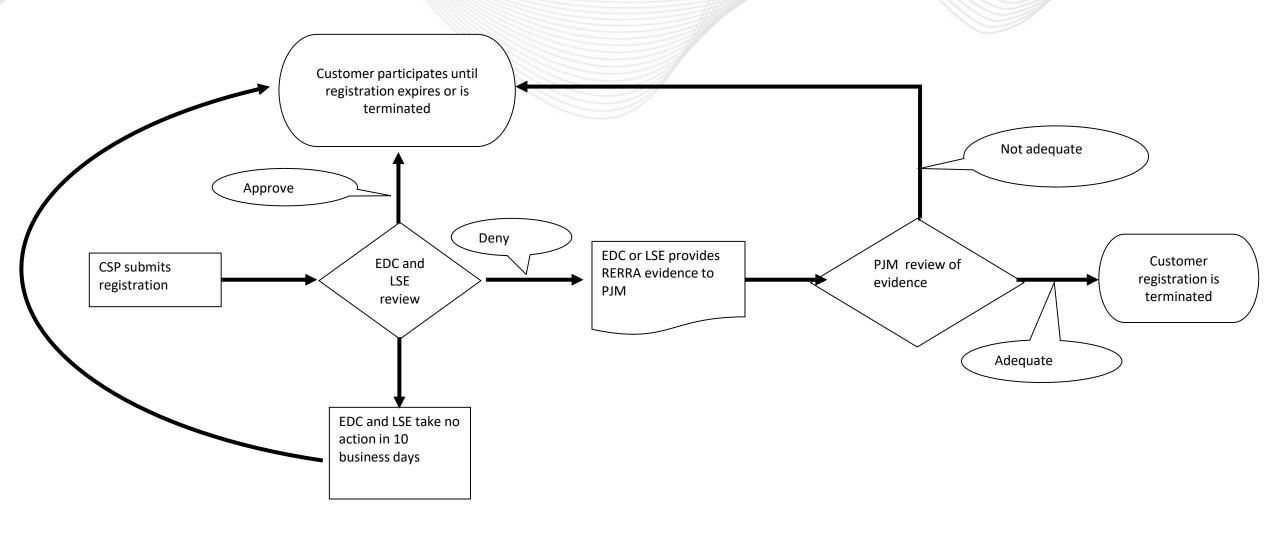


Registrations EDC Perspective



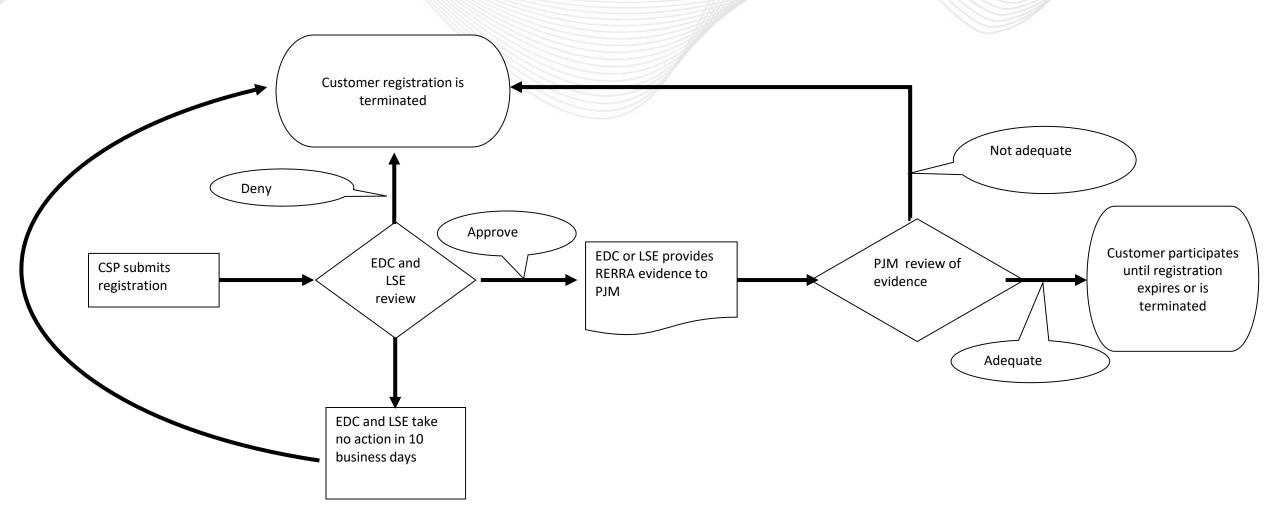


Large EDC (>4 million Mwh)





Small EDC (=<4million Mwh)





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