

DR Registration Submission Deadline - Problem Statement and Issue Charge

Under current rules, Demand Resources may only be registered for RPM purposes in the period from January 1 to May 15 and only for the Delivery Year following the May 15 deadline. As a result, customers that may be willing to contribute to reliability during the Delivery Year but after the May 15 deadline are unable to participate as a Demand Resource and may only participate as an Economic demand resource. The implementation of CP has changed Demand Resource obligations and penalties which may allow for more flexible registration submission timeline requirements.

The registration window is a result of the legacy combination of seasonal performance requirements and seasonal penalty structures for products such as Limited DR and Extended Summer DR and the daily obligation nature for Capacity resources generally.

With the advent of Capacity Performance and an hourly performance assessment, along with an hourly penalty structure there is an opportunity to review the impact of the impact of these rules. An open registration window may increase reliability and reduce provider risks and customer costs by allowing willing customers to be registered after May 15 thereby allowing their performance to be recognized and compensated. This would be comparable to the current practice of recognizing a generator as a resource at the time of commissioning.

It is recommended that the current DR registration submission deadline be reviewed to determine if it is still needed.

Key Work Activities

The following are some key work activities that should be undertaken to address the above stated problems.

1. Review the reasons for the current window and ascertain if the reasons are appropriate for DR acting as CP or Base Capacity.
2. Develop Manual changes and Tariff changes as necessary.

Stakeholder Group Assignment

The DRS is the recommended forum for this work.

Expected Deliverables

Possible Manual, Tariff, OA, and RAA changes.

Expected Overall Duration of Work

The goal is to complete work and make recommendations to the MRC by the November 2016 MRC meeting.

Decision-Making Method

Tier 1, consensus (unanimity) on a single proposal