Order on PJM's FO2222 Compliance Filing: Work Plan

Scott Baker

Applied Innovation

Distributed Resources Subcommittee

June 23, 2023

- On March 30, 2023 PJM requested an extension on the 60-day compliance filing deadline to address the directives in the March 1 Order, from May 1, 2023 to September 1, 2023.

  – FERC granted extension on April 11, 2023

- Order on PJM's March 31st compliance filing related to capacity market mitigation of DER Capacity Aggregation Resources.

  – *"Contrary to PJM's assertion that currently resources that are co-located with retail end-use load are not subject to MOPR or MSOC, we find that such rules do not apply according to whether the resource is connected to distribution facilities or co-located with retail end-use load."*

- Stakeholder engagement will be through the DISRS
  - 4/10, 5/8, 5/25, 6/5, 6/23, 7/14, 7/31, 8/7 scheduled meetings

Meeting	Initial PJM Directive Presentation	Further Stakeholder & PJM Discussion
5/8	Utility Review, Dispatch Agent, EDC, Ops Coordination	
5/25	NEM, Double Counting, Metering and Telemetry	Utility Review, Dispatch Agent, EDC, Ops Coordination
6/5	Locational Requirements	*Previous Topics* + NEM, Double Counting
6/23	Info & Data, Reliability Criteria, Dispute Resolution	*Previous Topics* + Locational Requirements
7/14	Continuous Model, Participation Criteria	*Previous Topics* + Info & Data, Reliability Criteria, Dispute Resolution
7/31	DER Opt-In, DR Opt-Out	*Previous Topics* + Continuous Model
8/7	Tariff Redline Review	None

Area	FERC Directive	DISRS Discussion
DER Opt-In	Additional Explanation on evidence from the RERRA	**July 31**
DR Opt-Out	Explain how we are using the existing DR process	**July 31**
Dispute Resolution	Update tariff to allow additional dispute resolution by PJM – adding disputes between EDC and Aggregator	**June 23**
Non-performance	Add non-performance details in the Tariff	(Tariff redline review only)
Metering & Telemetry	Adding existing business rules into the Tariff *Note: metering and telemetry can be discussed in information and data area*	**May 25**

Area	FERC Directive	DISRS Discussion
Capacity Mitigation 30-day filing	Subject all aggregations to mitigation based on underlying DER.	April
Utility Review	Change reviewer to *host* EDC only, limit review to incremental changes, elimination of pre-registration and strict 60 day review, add data sharing with Aggregator.	**May 8**
Dispatch Agent	Remove dispatch agent concept from the tariff, Aggregator dispatches Component DER.	**May 8**
EDC	Define EDC in the Tariff.	**May 8**
Operational Coordination	Add more details on utility's ability to override dispatch, add more detail on communication protocols.	**May 8**

Area	FERC Directive	DISRS Discussion
NEM	Do not allow A/S by default and allow co-located NEM resources to participate, without the same exclusions as NEM DER.	**May 25**
Double Counting	Change the tariff provision for "product credited" to "product provided".	**May 25**
Info and Data	Add more data on interconnection details, locational mapping, metering & telemetry.	**June 23**
Reliability Criteria	Specify that the reliability review must be incremental	**June 23**
Participation Criteria	Add more transparency and details in the tariff on criteria for participation.	**July 14**

Area	FERC Directive	DISRS Discussion
Locational Requirements	Further defend nodal aggregations or propose a different design, pending design also need to address "distribution factors"	**June 5**
Continuous Model	Provide more details in the Tariff on how to settle continuous resources for DR and Generation.	**July 14**
Effective Dates	July 2023 for Planned DER, Feb 2026 for Operational participation. & Overall filing review including Tariff redlines (as available)	**Aug 8**

SME/Presenter:
Scott Baker

Scott.Baker@pjm.com

Facilitator:

Ilyana Dropkin

Ilyana.Dropkin@pjm.com

Secretary:

Luke Zinszer

Luke.Zinszer@pjm.com

Capacity Market Mitigation for DER Capacity Aggregation Resources

Member Hotline

(610) 666 – 8980

(866) 400 – 8980

custsvc@pjm.com

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