

Governing Document Enhancement & Clarification Subcommittee (GDECS)

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GDECS Summary

March 2024 Revisions Batch:

- Markets Related Changes
 - GDECS first read: February 8, 2024 and February 23, 2024
 - GDECS second read: March 7, 2024
- GDECS Voting Window: March 7, 2024 March 14 2024
 - Passed with 74.4% Support
- MRC Endorsement: April 25, 2024
 - Passed with 3.350 in favor



GDECS Summary

March 2024 Revisions Batch includes:

- Removal of sunset terms
- Updated terminology references
- Grammatical and typographical corrections

- Update and removal of cross references
- Drafting and scribing
 errors

GDECS Summary

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Applicable Sections:

- Tariff Definitions A-B, C-D, E-F, L-M-N, R-S, O-P-Q
- Tariff, Attachment C
- Tariff, Att. Q, Section B.2, B.3
- Tariff, Attachment DD, Sections 5.6.1, 5.6.6, 5.12, 5.14, and 6.8
- Tariff, Attachment DD-1, Section L.1,
- Tariff, Attachment DD-2, Sections (B) and E
- Tariff, Attachment K-Appendix, Sections 1.5A.10, 3.3A.2, 3.3A.8, and 8.11

- Operating Agreement, Section 1 Definitions E-F, O-P, S-T
- Operating Agreement, Schedule 6, section 1.5.5 (b)
- OA, Schedule 1, Section 1.5A.10, 3.3A.2, 3.3A.8, 8.11
- Reliability Assurance Agreement, Schedule 1, Definitions
- RAA, Schedule 6, section L.1



- It is clear that "End-Use Customer" was inadvertently capitalized in certain provisions, based on:
 - The market design of these programs and their consistent implementation, for over a decade in the case of load response and Energy Efficiency Resources
 - Inconsistent use of the inadvertently capitalized term throughout these provisions
 - The transmittal letters that added the uppercase "End-Use Customer" did not contemplate or even discuss limiting energy efficiency, load response, or Peak Shaving Adjustment programs to only end-use customers that are also PJM Members;
 - Rather, such revisions were expressly intended to achieve other less sweeping changes specified in the transmittal letters.



End Use Customer in Energy Efficiency

- <u>RAA, Schedule 6, section L.1 & Tariff, Attachment DD-1, section</u>
 <u>L.1</u>
- Revisions filed in response to "inquiries concerning whether upgrades to existing equipment of the transmission and distribution systems, including transformers" qualified as Energy Efficiency Resources, explaining that the reduction in electric energy consumption must be *behind* the meter and noting that "[t]hese clarifications make PJM's Energy Efficiency Resource definition consistent with... other RTOs/ISOs."
- Only 1 uppercase use and 22 lowercase uses in Schedule 6.
- Filed October 26, 2010 in Docket No. ER11-1909-000.

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- <u>OA, Schedule 1, Section 1.5A.10, 3.3A.8, and 8.11 & Tariff,</u> <u>Attachment K-Appendix, Sections 1.5A.10, 3.3A.8, and 8.11.</u>
- Included pursuant to the Commission's directive that PJM reflect the aggregation rules for demand response resources, including allowing participation with less than 100 kW of response.
- Sections 1.5A and 8 state that "end-use customer" refers to an individual location or aggregation of locations that consume electricity as identified by a unique electric distribution company account number.
- Lowercase uses: 40/49 in 1.5A, 33/38 in 8, & 18/21 in 3.3A.
- Filed March 18, 2010 in Docket No. ER09-1063-003

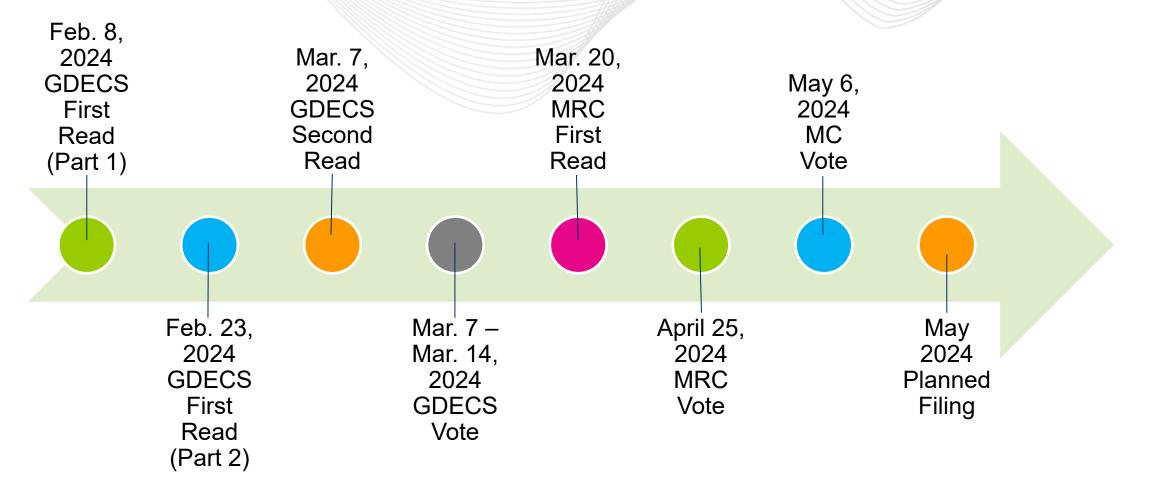


End Use Customer in Peak Shaving Adjustment

- OA, Schedule 1, 3.3A.2 & Tariff, Attachment K-Appendix, Section 3.3A.2 and RAA, Schedule 1, Definitions
- Filed December 7, 2018 in Docket No. ER19-511-000 to explain that Customer Baseline Load will be the metric used for measuring the performance of peak shaving programs and to add a new definition for Peak Shaving Adjustment.
- <u>Tariff, Attachment DD-2</u>
- Filed May 30, 2019, in Docket No. ER19-511-002 in compliance with the Commission's directive that PJM incorporate into the Tariff existing Manual provisions pertaining to the terms and conditions of Peak Shaving Adjustment.



GDECS Timeline – March 2024 Batch





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