

# Overview of Draft Gap Analysis Matrix

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Component addressed by the existing language was identified

Existing BTMG business rule language was listed and grouped into 4 main areas

Gaps in existing business rule language were identified

Main area

#	Component	Existing Language (Status Quo)	Identified Gap
	<b>Designate Capability as Generation Capacity Resource and/or Energy Resource</b>		
1	Unit specific basis or partial unit basis	<b>Manual 14D, Appendix A,#11.</b> If multiple generation units are located behind the meter, each unit can be designated as either a Capacity Resource or as BTMG on a unit specific basis or on a partial unit basis.	Clarify that each unit can be designated as "either a Generation Capacity Resource and/or Energy Resource or as BTMG" on a unit specific basis or on a partial unit basis".
		<b>Manual 14G, Section 1.6:</b> Any Behind the Meter Generation which seeks to be designated in whole or in part as an energy or capacity resource must submit a Generation Interconnection Request for the portion of the unit's output that will participate in the PJM market...	Clarify in M14D, Appendix A that unit must submit a Generation Interconnection Request if it desires to be designated in whole or part as either a Generation Capacity Resource and/or Energy Resource.
		1.6.1 BTMG Interconnection Requests: Any Behind the Meter Generation that desires to be designated, in whole or in part, as a Capacity Resource or Energy Resource must submit a Generation Interconnection Request. (Tariff at Part VI, in Section 36.1.01 – formerly Subpart A at 36.1A, in Part IV).	Clarify that a change to Generation Capacity Resource and/or Energy Resource status represents an increase in the MW of capability designated as a Capacity Resource and/or Energy Resource.
2	PJM Generation Interconnection Request requirement		Clarify that an increase in the MW of capability designated as Capacity Resource and/or Energy Resource requires a Generation Interconnection Request.

Designate Capability  
as Generation  
Capacity Resource  
and/or Energy  
Resource

Designate Capability  
as PJM Load  
Response

Load Impacts

Performance  
Obligation Impacts

## Designate Capability as Generation Capacity Resource and/or Energy Resource

- Unit specific basis or partial unit basis
- PJM Generation Interconnection Request requirement
- MW amount of capability that may be designated
- Process to request a status change
- Timing and duration of a status change
- Treatment of CIRs
- Ineligibility for reactive payments for portion of unit in BTMG status

## Designate Capability as PJM Load Response

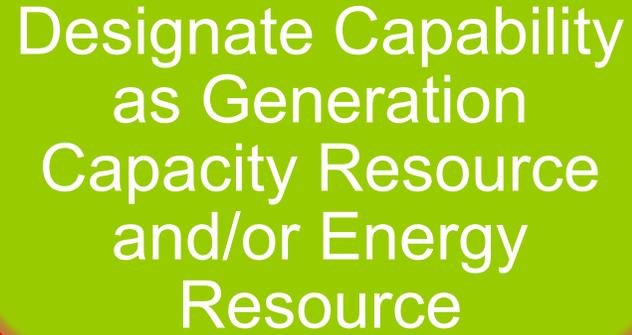
- Options to designate capability as PJM Load Response
- Duration of a designation to provide Pre-Emergency /Emergency Load Response
- Process to designate capability as PJM Load Response

## Load Impacts

- Impact of operating BTMG during coincident peak hours on NSPL and OPL
- Applicability of load adjustment request for NSPL or OPL
- Process to request adjustments to NSPL or OPL
- Applicability of load adjustment request for actual/scheduled load and process to request such adjustments
- Timing requirements for load adjustments

## Performance Obligation Impacts

- Performance Obligations for portions of capability designated
- Restrictions on status change from NRBTMG to Capacity Resource/Energy Resource due to NRBTMG performance penalties.

A green rectangular box with white text, circled in red. The text reads: "Designate Capability as Generation Capacity Resource and/or Energy Resource".

Designate Capability as Generation Capacity Resource and/or Energy Resource

A blue rectangular box with white text. The text reads: "Designate Capability as PJM Load Response".

Designate Capability as PJM Load Response

An orange rectangular box with white text. The text reads: "Load Impacts".

Load Impacts

A grey rectangular box with white text. The text reads: "Performance Obligation Impacts".

Performance Obligation Impacts

- Comments on gaps identified in other areas of Gap Analysis Matrix are welcome by email

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**MIC Special Session - Behind the Meter  
Generation Business Rules on Status Changes**



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