

# Designate Capability as PJM Load Response

Theresa Esterly

Sr. Lead Engineer, Markets Automation &  
Quality Assurance

MIC Special Session

BTMG Business Rules on Status Changes

April 30, 2021

# Gap Analysis Matrix

#	Component	Existing Language (Status Quo)	Identified Gap
	<b>Designate Capability as PJM Load Response</b>		
8	Options to designate capability as PJM Load Response	<p><b>Manual 14D, Appendix A #21.</b> BTMG may participate in all relevant PJM demand side response programs (e.g. the PJM Interchange Energy Market and the PJM Capacity Market (RPM)) under the terms and conditions in effect at the time the BTMG requests participation in the program, subject to Rule 22 below.</p> <p><b>#23.</b> A BTM generator may participate in the PJM Load Response programs under the terms and conditions in effect at the time the BTM generator requests to participate in the program.</p> <p><b>OATT, Definition:</b> "On-Site Generators" shall mean generation facilities (including Behind The Meter Generation) that (i) are not Capacity Resources, (ii) are not injecting into the grid, (iii) are either synchronized or non-synchronized to the Transmission System, and (iv) can be used to reduce demand for the purpose of participating in the PJM Interchange Energy Market.</p>	<p>Clarify participation options, relevant limitations, or restrictions to participation as PJM Load Response. Point to relevant sections in PJM Manuals that contain business rules for participation (M-11 section 10, M18-Section 4.3).</p> <p>Business rule #21 and 23 are duplicative.</p>
9	Duration of designation as Pre-Emergency/Emergency Load Response/Use of Output	<p><b>Manual 14D, Appendix A #22.</b> A generator may be used for Load Management (LM) credit or it can be used to net against load as a BTM generator, but cannot be used for both purposes simultaneously. The election of BTM or LM status must remain in effect for an entire planning period.</p>	<p>Clarify that BTMG unit may have capability participating as Pre-Emergency/Emergency Load Response as On-site Generator.</p> <p>Clarify the restrictions if a BTMG unit injects past point of interconnection.</p> <p>Clarify that a MW of output from a BTMG unit shall only for used for a single purpose for any interval.</p> <p>Clarify that if a BTMG unit is used to peak shave during relevant coincident peak hours used to determine the PLC for a delivery year, this action impacts the ability to participate as Capacity Demand Resource (Pre-Emergency/Emergency Load Response) for such delivery year .</p>
10	Process to designate capability as PJM Load Response	No existing manual language in M14D, Appendix A.	Add references to the registration process in DR Hub.

21. ~~A BTMG unit may have capability participating in all relevant PJM demand-side Load Response Programs (Pre-Emergency/Emergency and/or Economic Load Response)(e.g. the PJM Interchange Energy Market and the PJM Capacity Market (RPM)) under the terms and conditions in effect at the time of participation in accordance with Manual 11, Energy & Ancillary Services Market Participation, Section 10 and Manual 18, PJM Capacity Market, Section 4.3.the BTMG requests participation in the program, subject to Rule 22 below.~~

- Clarify BTMG unit may have capability participating in Pre-Emergency/Emergency and/or Economic Load Response.
- Reference relevant PJM Manual sections for business rules on participation as PJM Load Response in Energy & Ancillary Services Markets and Capacity Market.

~~22. A generator may be used for Load Management (LM) credit or it can be used to net against load as a BTM generator, but cannot be used for both purposes simultaneously. The election of BTM or LM status must remain in effect for an entire planning period.~~

~~22. A BTM generator may participate in the PJM Load Response programs under the terms and conditions in effect at the time the BTM generator requests to participate in the program. A Curtailment Service provider indicates a BTMG unit is participating as Pre-Emergency/Emergency and/or Economic Load Response by providing on-site generator data for a location through the registration process in DR Hub. Details regarding Economic registration process is in Manual 11, Section 10.2. Details regarding Pre-Emergency/Emergency registration process is in Manual 18, Section 4.3.5. A Pre-Emergency/Emergency Load Response registration is effective for a Delivery Year.~~

- Delete duplicative information and information clarified in new business rules.
- Add new rule to clarify CSP indicates a BTMG unit is participating as Pre-Emergency/Emergency and/or Economic Load Response by providing on-site generator data for a location through the registration process in DR Hub.
- Reference relevant PJM Manual sections for the registration process details.
- Clarify a Pre-Emergency/Emergency Load Response registration is effective for a Delivery Year.

23. If a portion of the BTMG unit injects past the point of interconnection, the portion that injects may not participate as PJM Load Response; however, it may participate as a Generation Capacity Resource and/or Energy Resource (provided it has meet all the applicable requirements for Generation Capacity Resource and/or Energy Resource status).

- Add new rule to clarify restrictions if BTMG unit injects past the point of interconnection.

24. A MW of output from the BTMG unit shall only be used for a single purpose for any interval. A MW may be used as BTMG that nets against the load as part of normal operations, may provide PJM Load Response, or may be used as a Generation Capacity Resource and/or Energy Resource. A MW of output may not be used for multiple purposes simultaneously.

- Add new rule to clarify a MW of BTMG output shall only be used for a single purpose for any interval.

23-25. If a BTMG unit is operated during the relevant coincident peak hours to reduce the Peak Load Contribution (PLC) for a Delivery Year, this action will reduce the unit's ability to participate as Pre-Emergency/Emergency Load Response for such Delivery Year.

- Add new rule to clarify the impact of operating a BTMG unit to reduce the PLC for a Delivery Year.

## Facilitator:

Nicholas Disciullo, [Nicholas.Disciullo@pjm.com](mailto:Nicholas.Disciullo@pjm.com)

## Secretary:

Andrea Yeaton, [andrea.Yeaton@pjm.com](mailto:andrea.Yeaton@pjm.com)

## SME:

Terri Esterly, [Theresa.Esterly@pjm.com](mailto:Theresa.Esterly@pjm.com)

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



## Member Hotline

(610) 666 – 8980

(866) 400 – 8980

[custsvc@pjm.com](mailto:custsvc@pjm.com)