

RERRA Review Process of Energy Efficiency Resources and FERC Order on Petition of Declaratory Order



Pete Langbein Manager, Demand Response Operations Markets & Reliability Committee December 21th, 2017

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- Stakeholders consider reforms for Energy Efficiency Resources including:
 - the establishment of rules requiring that the providers of Energy Efficiency Resources comply with any RERRA orders, ordinances or resolutions relating to the participation of energy efficiency in the PJM markets;
 - if necessary, the establishment of rules requiring review of whether proposed Energy Efficiency Resources comply with RERRA orders, ordinances or resolutions; and
 - if necessary, the treatment of Energy Efficiency Resources that have already cleared a past capacity auction and have a position for a future Delivery Year.

Focus on development of RERRA review process that can be used once FERC determines jurisdiction issue

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FERC order on Petition of Declaratory Order (Docket No. EL17-75-000, 12/1/17)

- FERC has exclusive jurisdiction for EE resources. RERRA may file with FERC to seek approval to qualify or prohibit EE resource participation
- EE resources may not participate in KY in future auctions (3rd IA in Feb '18 and future auctions) without approval by KY RERRA.
 - EE Providers that have an EE commitment in KY from prior auctions can deliver EE in KY for such Delivery Year(s).



Stakeholder process timeline

	First Read	Endorsement
MIC	12/13/17	1/10/17
MRC	12/21/17	1/25/17
MC		1/25/17

File with FERC by 2/1 (approval in April before EE set up window for BRA closes 5/7) (use new EE RERRA review process for approved KY RERRA order)



DRS proposal – RERRA review process

- If RERRA receives FERC approval on order, ordinance or resolution to qualify or prohibit EE participation then:
 - PJM to post reference to all RERRA evidence approved by FERC, applicable EDC(s) and Deliver Years and/or auctions
 - PJM to adjust granularity of EE M&V plan and EE Post-Installation M&V report to facilitate necessary EDC review
 - PJM to send list of EE Providers with EE M&V plan (30 days prior to auction) and EE Post-installation M&V report (15 days prior to start of Delivery Year) to EDC to review for RERRA compliance
 - EDC to review EE Provider list and provide approval in 5 business days

EE Provider may provide EE for all retail jurisdictions unless FERC approves RERRA evidence



DRS proposal – RERRA review process (continued)

- EE cleared in auction that is not permitted to deliver EE in RERRA jurisdiction (based on FERC approval) may be relieved of commitment and associated revenue
 - non-viable commitments similar to 5.14B (Generating Unit Capability Verification Test Requirements Transition Provision), 5.14C (Demand Response Operations Resource Flexibility Transition Provision), and 5.14E (Demand Response Legacy Direct Load Control Transition Provision) of Attachment DD of OATT
 - Non-viable commitment must be communicated to PJM no later than seven (7) days prior to the posting by the Office of the Interconnection of planning parameters for the Third Incremental Auction

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RERRA review process applied to Kentucky

- Require EE providers to itemize EE in AEP and DEOK zones into KY and non-KY location. EKPC zone is in KY and does not need to be changed.
 - EE plan and EE post installation measurement and verification plan templates will be updated
- PJM to send list of EE providers with EE identified in KY (AEP-KY, DEOK-KY, EKPC) to EDC for approval
 - EDC will review list of EE providers and ensure they can deliver EE in KY based on RERRA
 - PJM will only allow EE Provider in auction and Delivery Year based on EDC approval.



- EE review timeline
- EE M&V plan
- EE Post Installation M&V report



Energy Efficiency Requirements Timeline

EE M&V
Plan

M&V Report

30 days

DY RPM Auction

Delivery Year



Energy Efficiency M&V Plan

- Includes project(s) description, M&V techniques used to determine and verify the Nominated EE Value and Capacity Performance value of project(s), and schedule for project(s) installation and M&V activities
- Provides Nominated EE Value and CP Value by installation period and zone/sub-zonal LDA that intend to offer
- Plan due 30 days prior to start of an RPM Auction.
- Plan is auction-specific and addresses the MWs that intend to offer in such auction.
- M&V Plan Requirements described in PJM Manual 18B
- EE M&V plan and nominated value templates are available on PJM Website at http://www.pjm.com/markets-and-operations/rpm.aspx



DY Post-Installation M&V Report

- Report includes:
 - Results of measurement activities and post-installation verification activities
 - Validated Nominated EE Value and Capacity Performance value of an EE Resource for the DY
 - Demonstration of capacity rights
 - Site-specific information for EE programs that involve a direct installation (e.g., lighting, HVAC, chiller, or motor retrofits)
- Report due 15 business days prior to the DY
- Report is DY specific and addresses the EE Resources that were committed for such DY
- Post Installation M&V Report Requirements described in PJM Manual 18B
- PI M&V Report template is available on PJM Website at http://www.pjm.com/markets-and-operations/rpm.aspx