

## Determination of CBL used for DR CP non-summer capacity compliance

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- Summer capacity compliance calculation no change, do same as today
  - Load Reduction = PLC (load \* losses)
- NEW: Non-summer capacity compliance calculation
  - Load Reduction = (CBL load) \* losses
- New CP DR rules leverage Economic CBL rules





- Tariff refers to Economic CBLs rules instead of use of Economic CBL with economic alternative CBL rules
- All CP and Base registrations required to perform Relative Root Mean Square Error ("RRMSE") test
  - 60 days of load data (primarily provided to CSP by EDC with customer consent)
  - <20% RRMSE, otherwise alternative CBL process</li>
    - Ultimately PJM determined CBL if no accurate CBL available
  - RRMSE must be done before start of Delivery Year

Significant administrative effort for limited potential value



**Proposed Solution** 

- Use default economic CBL as default Load Management CBL
  - 3 day type with symmetric additive adjustment
  - Extensive CBL analysis determined this is accurate CBL for broad range of customers
- RRMSE test is not required for Load Management registrations unless CSP requests use of "alternative" CBL
- If customer has both Economic and Load Management registration then use CBL on Economic registration (unless it is MBL type)