



Order on PJM's FO2222 Compliance Filing: Work Plan

Scott Baker

Distributed Resources Subcommittee

August 16, 2023

- On March 30, 2023 PJM requested an extension on the 60-day compliance filing deadline to address the directives in the March 1 Order, from May 1, 2023 to September 1, 2023.
 - FERC granted the extension on April 11, 2023
- Order on PJM’s March 31st compliance filing related to capacity market mitigation of DER Capacity Aggregation Resources.
 - *May 30th FERC Order: “Contrary to PJM’s assertion that currently resources that are co-located with retail end-use load are not subject to MOPR or MSOC, we find that such rules do not apply according to whether the resource is connected to distribution facilities or co-located with retail end-use load.”*
 - On June 14, 2023, in Docket No. ER22-962-004, PJM submitted a compliance filing clarifying that the capacity market mitigation rules would apply when DER Capacity Aggregation Resources can first participate in PJM's capacity market, and PJM proposes to defer setting an effective date for the capacity market revisions. PJM requests Commission action by November 30, 2023 on this filing.

- Stakeholder engagement will be through the DISRS
 - 4/10, 5/8, 5/25, 6/5, 6/23, 7/14, 7/31, 8/16 scheduled meetings

Meeting	Initial PJM Directive Presentation	Further Stakeholder & PJM Discussion
5/8	Utility Review, Dispatch Agent, EDC, Ops Coordination	
5/25	NEM, Double Counting, Metering and Telemetry	Utility Review, Dispatch Agent, EDC, Ops Coordination
6/5	Locational Requirements	<i>Previous Topics</i> + NEM, Double Counting
6/23	Info & Data, Reliability Criteria, Dispute Resolution	<i>Previous Topics</i> + Locational Requirements
7/14	Continuous Model, Participation Criteria	<i>Previous Topics</i> + Info & Data, Reliability Criteria, Dispute Resolution
7/31	DER Opt-In, DR Opt-Out, Locational Requirements	<i>Previous Topics</i> + Continuous Model, Participation Criteria
8/16	Tariff Redline Review	None



FERC Order Directives - Overview

Area	FERC Directive	DISRS Discussion
DER Opt-In	Additional Explanation on evidence from the RERRA	July 31
DR Opt-Out	Explain how we are using the existing DR process	July 31
Dispute Resolution	Update tariff to allow additional dispute resolution by PJM – adding disputes between EDC and Aggregator	June 23
Non-performance	Add non-performance details in the Tariff	(Tariff redline review only)
Metering & Telemetry	Adding existing business rules into the Tariff <i>Note: metering and telemetry can be discussed in information and data area</i>	May 25



FERC Order Directives - Overview

Area	FERC Directive	DISRS Discussion
Capacity Mitigation 30-day filing	Subject all aggregations to mitigation based on underlying DER.	April
Utility Review	Change reviewer to <i>host</i> EDC only, limit review to incremental changes, elimination of pre-registration and strict 60 day review, add data sharing with Aggregator.	May 8
Dispatch Agent	Remove dispatch agent concept from the tariff, Aggregator dispatches Component DER.	May 8
EDC	Define EDC in the Tariff.	May 8
Operational Coordination	Add more details on utility's ability to override dispatch, add more detail on communication protocols.	May 8

Area	FERC Directive	DISRS Discussion
NEM	Do not allow A/S by default and allow co-located NEM resources to participate, without the same exclusions as NEM DER.	May 25
Double Counting	Change the tariff provision for “product credited” to “product provided”.	May 25
Info and Data	Add more data on interconnection details, locational mapping, metering & telemetry.	June 23
Reliability Criteria	Specify that the reliability review must be incremental	June 23
Participation Criteria	Add more transparency and details in the tariff on criteria for participation.	July 14



FERC Order Directives - Overview

Area	FERC Directive	DISRS Discussion
Locational Requirements	Further explain nodal aggregation rationale, or propose a different design; pending design also need to address “distribution factors”	June 5 July 31
Continuous Model	Provide more details in the Tariff on how to settle continuous resources for DR and Generation.	July 14
Effective Dates & Tariff redlines	July 2023 for Planned DER, Feb 2026 for Operational participation. & Overall filing review including Tariff redlines (as available)	Aug 16
Compliance Filing Deadline		September 1, 2023

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