

# Effective Rules for Behind-the-Meter Capacity in RBP

Voltus  
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To unlock **GWs of BTM capacity** in the RBP, we propose three enhancements to PJM's initial proposal



# 1. Define Eligibility Consistently Across All Resource Classes

# Uprates and Reactivations Should Be Consistently Eligible

- PJM's current Central Procurement design allows uprates at existing generators and reactivations of mothballed units.
- On the distributed resource side, the current requirement is that resources comprise "locations that have not previously participated in PJM's RPM" (PJM RBP Presentation, 4/16-17, slide 12). On plain reading, this excludes uprates and reactivations at existing sites.
- ***Uprates and reactivations for DR/DER can be straightforwardly defined and identified.***

# Uprates and Reactivations for DR/DER

- **Uprate:** a location that previously participated in a DR or DER aggregation installs a new BTM asset (aka battery).
- **Reactivation:** a site that was not registered as part of an RPM-committed resource for DY25/26 or DY26/27, but may have participated in an earlier delivery year, is eligible.
- *These inclusions promote parity and correctly incentivize investment on the basis of the new market signal. For instance, it would be counterproductive to exclude on-site battery investment simply because the host site is already providing nominal Load Management.*

## 2. Enable Aggregators to Demonstrate a Pathway to Commercial Readiness At Time of Bid

# Current PJM Design Imposes Unequal Criteria for Generation vs BTM Resources

- Stage 1 gating criteria ask generators to demonstrate a clear pathway to commercial readiness (permitting and financing **plans**, **MOUs** for major equipment, etc.)
- By contrast, suppliers of DR/DER aggregations are asked to show “the identified sites and associated **contracts** for participation for the length of term of their bid” (emphasis added)—essentially, full commercial readiness at time of bid.
- Instead, the gating criteria should require “evidence of project feasibility” (PJM RBP Presentation, 4/16-17, slide 17).

# Allow Sell-Offer Plan as Stage 1 Gating Criteria

- CSPs/DERAs who offer into the BRA today submit a sell-offer plan which PJM approves prior to offer submission, placing a ceiling on the MWs the aggregator can offer into market.
- The same BRA sell-offer plan construct, with additional criteria to demonstrate the newness of expected resources, would better align with Stage 1 gating criteria for generators. Sites would then be identified prior to the delivery year and checked by PJM to confirm newness (site not previously registered, site uprate, or site reactivation).

# 3. Provide Solutions to Address ELCC Changes Over Long-Term Contracts

# Allow replacement capacity or similar

- Sellers will construct offers based on best available ELCC forecasts at time of bid, but ELCC variability against forecast creates substantial uncertainty over long-term contracts.
- If not addressed, the imposed risk allocation will lead to (1) volumetrically conservative RBP offers and (2) shorter contract term lengths, frustrating the goals of the Procurement.
- Parties should be afforded a mechanism to buy-out or replace the committed UCAP, or to fix the ELCC value for the term of the contract.

# Thank you.

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The Voltus logo features the word "voltus" in a lowercase, sans-serif font. The letter "o" is replaced by a stylized circular icon consisting of three concentric rings, with the innermost ring being a solid white circle. A small "TM" trademark symbol is positioned to the upper right of the "s".