



Distributed Resources Subcommittee (DISRS) Final Report

ISSUE CREATION

[Problem Statement](#) and [Issue Charge](#) brought forward by Distributed Resources Subcommittee (DISRS) and reached consensus at the December 2, 2024 DISRS meeting.

The issue was worked through the DISRS [Charter](#)

ISSUE SUMMARY

This work is intended to address a specific OATT issue that prohibits behind-the-meter (BTM) battery energy storage systems (BESS) participating in the Regulation Market from injecting into the distribution grid in PJM zones with Net Energy Metering (NEM). PJM expects to address this issue in its proposed FERC Order 2222 compliance date of February 2, 2028. The subcommittee seeks earlier allowance of injection from these BTM BESS in NEM zones solely for participation in the Regulation Market.

CONSENSUS-BASED ISSUE RESOLUTION PROCESS

Number of Meetings and date range covering this topic at DISRS: 4 Meetings, 1/10/2025 - 4/4/2025.

Non-Binding Poll Results: None

Vote Results: DISRS reached consensus on proposing one solution package on 4/4/2025.

[Final Matrix](#)

1. RECOMMENDED PROPOSAL

Currently (status quo), Economic Demand Response (DR) Regulation Only registration may only participate in Regulation market and may only participate when there is load at the Point of Interconnection. If there is an injection at the POI during an interval they are not permitted to participate in the regulation market. The proposed change will allow participation in the regulation market when there is an injection at the POI as long as an EDC NEM Agreement is in place and the EDC explicitly approves the participation when there are injections. Further, the change is limited to Economic DR Regulation Only registrations where the location has been approved by PJM to use a submeter (load or Gen/Battery) for performance evaluation.

2. ALTERNATE 1 PROPOSAL

None

3. ALTERNATE 2 PROPOSAL

None



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4. STANDING COMMITTEE RESULTS

Market Implementation Committee (MIC) will vote on the proposed package at July 9, 2025 MIC meeting.

APPENDIX I: SUPPLEMENTAL DOCUMENTS

[Committee Page](#)

[Issue Tracking](#)

APPENDIX II: PJM PARTICIPATION

Facilitator: Ilyana Dropkin

Secretary: David Hauske

Subject Matter Expert: Pete Langbein

PJM Legal: Chen Lu

APPENDIX III: STAKEHOLDER PARTICIPATION

Last Name	First Name	Company	Sector
Abramowitz	Jeremy	Monitoring Analytics, LLC	None
Anders	David	PJM Interconnection, LLC	None
Anderson	Jared	S&P Global	None
Anderson	Juliet	Constellation Energy Generation, LLC	Generation Owner
Anderson	Juliet	Constellation Energy Generation, LLC	Generation Owner
Anthony	Jason	KORenergy, Ltd.	Other Supplier
Baizman	Aaron	PJM Interconnection, LLC	None
Baker	Scott	PJM Interconnection, LLC	None
Baker	Jeff	Duke Energy Ohio, Inc.	Transmission Owner
Barker	Jason	Vitol Inc.	Generation Owner
Barnes	Elizabeth	Pennsylvania Public Utility Commission	None
Barrett	Richard	New Jersey Board of Public Utilities	None
Bauer	Jessie	Commonwealth Edison Company	Transmission Owner
Belenky	Maria	PJM Interconnection, LLC	None
Benitez	Rick	Other	None
Benson	Dan	Duke Energy Indiana, LLC	Transmission Owner
Boyle	Glen	PJM Interconnection, LLC	None
Callen	Zachary	Illinois Commerce Commission	None
Campbell	Bruce	Enerwise Global Technologies, LLC	Other Supplier
Carrier	Ronald	Big Lake Consulting Group, LLC	None
Carson	Donna	East Kentucky Power Cooperative, Inc.	Transmission Owner



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Chang	Sean	Shell Energy North America (US), L.P.	Other Supplier
Chmielewski	Brian	PJM Interconnection, LLC	None
Christopher	Mahila	Public Utilities Commission of Ohio	None
Chu	George	PJM Interconnection, LLC	None
Clarke	Linda	PJM Interconnection, LLC	None
Clingan	Kristin	Public Utilities Commission of Ohio (The)	None
Connelly	Nancy	Duke Energy Ohio, Inc.	Transmission Owner
Connolly	Matthew	PJM Interconnection, LLC	None
Costa	Arthur	Dominion Virginia Power	Transmission Owner
Coyne	Suzanne	PJM Interconnection, LLC	None
Croop	Danielle	PJM Interconnection, LLC	None
D'Antonio	Phil	PJM Interconnection, LLC	None
Dalton	David	State Corporation Commission (Commonwealth of Virginia)	None
Davies	Steve	Indiana Regulatory Commission	None
Demiray	Eren	FirstEnergy Corporation	Transmission Owner
DeVita	Thomas	PJM Interconnection, LLC	None
Drom	Rick	Eckert Seamans	None
Dropkin	Ilyana	PJM Interconnection, LLC	None
Dugan	Chuck	East Kentucky Power Cooperative, Inc.	Transmission Owner
Ellis	David	Public Service Electric and Gas Company	Transmission Owner
Esterly	Theresa	PJM Interconnection, LLC	None
Fan	Zhenyu	PJM Interconnection, LLC	None
Fereshetian	Damon	PJM Interconnection, LLC	None
Fetterhoff	Logan	PJM Interconnection, LLC	None
Filomena	Guy	Customized Energy Solutions, Ltd.	None
Fink	Sari	MAREC Action	None
Flowler	Jequita	Potomac Electric Power Company	Electric Distributor
Foladare	Kenneth	Geenex Solar LLC	Other Supplier
Frede	Shannon	Maryland Energy Administration	None
Frogg	Darrell	PJM Interconnection, LLC	None
Fuess	Christian	PBF Power Marketing, LLC	Generation Owner
Fuller	Peter	Autumn Lane Energy Consulting LLC	None
Gates	Terry	AEP Appalachian Transmission Company, Inc.	Transmission Owner
Ghosh	Josh	Constellation Energy Generation, LLC	Generation Owner
Gilman	Catherine	University of Delaware	None
Gordon	Jon	Advanced Energy United	None
Gould	Val	Delaware Department of Natural Resources & Environmental Control	None
Grisolia	Albert	Public Service Electric and Gas Company	Transmission Owner
Haggart	Robert	Rockland Electric Company	Transmission Owner
Hallett	Brian	ReliabilityFirst	None



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Hanser	Erik	Michigan Public Service Commission	None
Hastings	David	Public Service Electric and Gas Company	Transmission Owner
Hauske	David	PJM Interconnection, LLC	None
Hebert	Evan	PECO Energy Company	Transmission Owner
Herel	Suzanne	PJM Interconnection, LLC	None
Himmelspach	Treasa	Appalachian Power Company	Transmission Owner
Hohenshilt	Jennifer	Talen Energy Marketing, LLC	Generation Owner
Horger	Tim	PJM Interconnection, LLC	None
Horstmann	John	Dayton Power & Light Company (The)	Transmission Owner
Hunter	Scott	Other	None
Hurd	Shawn	Monongahela Power Company d/b/a Allegheny Power	Transmission Owner
Hyzinski	Tom	GT Power Group, LLC	None
Janicki	Diane	Boston Energy Trading and Marketing LLC	Other Supplier
Johnson	Carl	Customized Energy Solutions, Ltd.	None
Johnston	David	Indiana Utility Regulatory Commission	None
Jones	Scott	Indiana Office of Utility Consumer Counselor (IN OUCC)	End-Use Customer
Kelly	Stephen	Brookfield Renewable Trading and Marketing LP (BSMH)	Other Supplier
Kempton	Nicholas	NRG Power Marketing LLC	Generation Owner
Kilgallen	Kevin	Avangrid Renewables, LLC	Generation Owner
Kirk	Ryan	AEP Appalachian Transmission Company, Inc.	Transmission Owner
Li	Kanning	PJM Interconnection, LLC	None
Litzke	Jack	PJM Interconnection, LLC	None
Lu	Chen	PJM Interconnection, LLC	None
Lyakhovich	Leonid	Public Service Electric and Gas Company	Transmission Owner
Mabry	David	McNees Wallace & Nurick LLC	None
Marhoefer	Jay	Intelligent Generation LLC	Other Supplier
mason	julie	Duke Energy Ohio, Inc.	Transmission Owner
Mason	Gary	Monongahela Power Company d/b/a Allegheny Power	Transmission Owner
Massarelli	Eva	Dominion Virginia Power	Transmission Owner
Matheson	he	YSO Inc.	Other Supplier
McDaniel	John	Baltimore Gas and Electric Company	Transmission Owner
McDewell	Christian	Commonwealth of PA	None
Mendez	Victor	Commonwealth Edison Company	Transmission Owner
Metz	John	University of Delaware	None
Miller	John	Calico Energy	None
Noonan	Casey	PJM Interconnection, LLC	None
Ondayko	Brock	AEP Energy Partners, Inc.	Transmission Owner
O'Neill	Jack	PJM Interconnection, LLC	None
Osborn	Eric	EDF Trading North America, LLC	Other Supplier
Patel	Harshil	PJM Interconnection, LLC	None



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patel	keyurbhai	PJM Interconnection, LLC	None
Pilong	Christopher	PJM Interconnection, LLC	None
Rainey	John	Northern Virginia Electric Cooperative (NOVEC)	Electric Distributor
Richardson	Terrence	Duquesne Light Company	Transmission Owner
Rutledge	Craig	AEP Appalachian Transmission Company, Inc.	Transmission Owner
Sasser	Jonathan	Customized Energy Solutions, Ltd.	None
Savage	Elizabeth	AES Solutions Management, LLC (ASMPPG)	None
Scheidecker	Paul	Monitoring Analytics, LLC	None
Scheirer	Alex	Gable and Associates	None
Schroeder	Connie	Dominion Virginia Power	Transmission Owner
Scott	Hugh	Baltimore Gas and Electric Company	Transmission Owner
Selick	Sam	Customized Energy Solutions, Ltd.	None
Shah	Vijay	PJM Interconnection, LLC	None
Simms	Mike	Duke Energy Ohio, Inc.	Transmission Owner
Simon	Emma	EDF Renewable Development, Inc.	None
Smith	Marelis	Public Service Electric and Gas Company	Transmission Owner
Stern	Alexander	Exelon Business Services Company, LLC	Transmission Owner
Strange	Robert	Yes Energy	None
Sturgeon	John	Duke Energy Business Services LLC	Transmission Owner
Sweeney	Rory	Northern Virginia Electric Cooperative (NOVEC)	Electric Distributor
Tao	Lili	Commonwealth Edison Company	Transmission Owner
Taylor	Daniel	PJM Interconnection, LLC	None
Taylor	Kaitlin	Dominion Virginia Power (LSE)	Transmission Owner
Trease	Rhett	Duke Energy Kentucky, Inc.	Transmission Owner
Tyler	Catherine	Monitoring Analytics, LLC	None
Uria	Ignacio	East Point Energy, LLC	None
Vanderlean	Bill	Illinois Commerce Commission	None
Veda	Santosh	Dominion Energy Generation Marketing, Inc.	Generation Owner
Vinnik	Daniel	PJM Interconnection, LLC	None
Wehnes	Kathleen	None	None
Werner	Christopher	AEP Appalachian Transmission Company, Inc.	Transmission Owner
Whitehead	Jeffrey	GT Power Group, LLC	None
Yeaton	Andrea	PJM Interconnection, LLC	None
Yoo	Kyungjin	PJM Interconnection, LLC	None
Zaccagnino	Michelle	Exelon Business Services Company, LLC	Transmission Owner
Zhang	Michael	PJM Interconnection, LLC	None
Zhou	Ming	DXT Commodities North America Inc.	Other Supplier
Zimmerman	Sean	PPL Electric Utilities Corp. dba PPL Utilities	Transmission Owner