Load Management Testing and the Substitution Process

Andrea Yeaton
Lead Analyst, Demand Side Markets

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LM and PRD Testing Update

- October wrapped up the Summer Period testing, with Winter Period starting in November and going through March
- Testing was postponed for June and July due to the number of Load Management events; resumed in August
- One Test Window posted June 22 through July 3 (for COMED Summer Only and RECO) was canceled due to expectations of Load Management events
- Load Management events, including two that dispatched all registrations in July, have decreased participation in Test events and led to questions about how to substitute LM Events for LM Tests

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Test Substitution Process

- Non-PAI event substitution for Test performance
  - CSP may elect to use performance during a Non-PAI event as Test performance
- CSP can select which group of registrations, by Zone and Lead Time (consistent with the current testing practice of dispatching at the Lead Time level), will use Non-PAI event performance over Test performance
  - CSP evaluates the performance value of a non-PAI event by taking the average of the hours of the non-PAI event
    - This is consistent with the average of two hours of test event
- The substitution selection takes place in DR Hub after the Delivery Year (June 1 through July 14) as the requirement to test may be waived if there is a PAI LM event(s)
  - Compliance records from Tests are created on June 1.
  - Once selected, the Non-PAI Events will create compliance records overnight, and the Status of original Test record will be changed to ***Substituted*** and will not be used in compliance calculations

If you plan to substitute an LM Event for a Test, mark it on your calendar to take action in DR Hub the following June

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Test Substitution Process

- PJM will continue to schedule zonal testing
  - If a CSP intends to not participate in a PJM scheduled test because they anticipate electing to use a non-PAI event for test assessment, they should reflect the nonparticipation in their Expected Reduction values reported to PJM for the test day (i.e. report zero for the test window)
    - Don’t forget to put real numbers back in Expected Reductions after the Test
- CSP subject to same test failure penalties as for testing

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FAQ

Question	Answer
If I did well in a non-PAI LM Event for certain zones/lead times but the zonal test has not occurred yet, do I still need to submit meter data for the Test Date?	No, the Test Events will have compliance records created the following June. You will then substitute the LM Events and the original compliance records will have a status of Substituted and will not be used.
How do I know if a LM Event was PAI or non-PAI?	Non-PAI events will appear under the Events Search page under 'Test Confirmation' button.
What changes can I expect in 2028/2029?	Any LM Event (PAI or non-PAI), in any season, removes the Test requirement.
If I substitute non-PAI LM Events for Tests, do I need to upload meter data again?	Probably not, but make sure you check the status of the compliance records to make sure that DR Hub picked up and is using the meter data from original LM event date. The status should be Confirmed.

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Test Substitution Process
Example Event Activity

CSP RPM Resource in PECO Zone										
			Event Date							
			NPAI		NPAI		PJM Sch Test		NPAI	
REGID	Lead Time		EventID	6/15/2024 Reduction (MW)	EventID	7/8/2024 Reduction (MW)	EventID	8/12/2024 Reduction (MW)	EventID	9/9/2024 Reduction (MW)
1	Long_120		1	2			6	3		
2	Long_120			3				5		
3	Long_120			4				5		
4	Short_60		2	1	4	1	7	1	9	2
5	Short_60			1		2		1		3
6	Short_60			1		3		2		2
7	Quick_30		3	3	5	2	8	1		
8	Quick_30			4		4		1		
9	Quick_30			3		1		1		
10	Quick_30			1		2		2		

Three (3) non-PAI Events and a PJM Scheduled Test Event

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Test Substitution Process
Example CSP Elections

CSP RPM Resource in PECO Zone										
			Event Date							
			NPAI		NPAI		PJM Sch Test		NPAI	
REGID	Lead Time		EventID	6/15/2024 Reduction (MW)	EventID	7/8/2024 Reduction (MW)	EventID	8/12/2024 Reduction (MW)	EventID	9/9/2024 Reduction (MW)
1	Long_120		1	2			6	3		
2	Long_120			3				5		
3	Long_120			4				5		
4	Short_60		2	1	4	1	7	1	9	2
5	Short_60			1		2		1		3
6	Short_60			1		3		2		2
7	Quick_30		3	3	5	2	8	1		
8	Quick_30			4		4		1		
9	Quick_30			3		1		1		
10	Quick_30			1		2		2		

CSP makes event elections

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Test Substitution Process
Example Election Result

REGID	Lead Time		PJM Sch Test 8/12/2024 Reduction (MW)	CSP elections Test Performance value (MW)	
1	Long_120		3	3	8/12 PJM Sch Test
2	Long_120		5	5	
3	Long_120		5	5	
4	Short_60		1	2	9/9 non-PAI
5	Short_60		1	3	
6	Short_60		2	2	
7	Quick_30		1	3	6/15 non-PAI
8	Quick_30		1	4	
9	Quick_30		1	3	
10	Quick_30		2	1	
			22	31	

Test performance higher (31 vs 22 MW) by using electing to use non-PAI events

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Contact

Presenter/SME:
Andrea Yeaton
Andrea.Yeaton@pjm.com

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Demand Side Markets

dsr_ops@pjm.com

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