Status Quo: Jurisdiction

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1. Distribution lines w/o prior wholesale sales: not under FERC Tariff.
2. Wholesale interconnection to such lines: state jurisdictional.

Note: state interconnection process for wholesale DER may be different than for state-jurisdictional net metered DER.

3. Exception: QF selling to PJM = FERC jurisdiction for interconnection if host utility opts out of mandatory purchase obligation.
4. Once a distribution line used for wholesale sales, it is subject to a FERC tariff. This is a “Dual Use Facility”.
5. Subsequent wholesale interconnections are FERC.
Appendix: Pigtails details

1. “Pigtails” allowing a generator to directly serve an adjacent load.
2. Pigtail sometimes allowed under state law, e.g. as an “on site generator”, self supply, or if owned by a utility. PJM views permissibility as a matter of state jurisdiction, not federal. There is no federal right to a pigtail.
3. DER that can provide emergency backup to adjacent customers could use pigtails, w/ some examples in PJM today.
4. Typically the pigtail must be disconnected for safety reasons while the grid is connected, and vice versa.
5. If state rules allow pigtails, PJM generators might be wired in this configuration, and therefore sell either to the grid, or through a separate “pigtail” wire directly to adjacent customers.
6. PJM W-DER proposal is compatible with this configuration, and tracks the interaction of the W-DER with the retail customer, e.g. for capacity market accounting.
Is this a Net Energy Metering (NEM) facility without excess generation at the end of a billing period?

NO 1. A NEM Facility with excess sales or
2. Not a NEM Facility

Is this a Qualifying Facility (QF) selling under a PURPA rate to the interconnected EDC?

NO 1. QF not selling to interconnected EDC at PURPA rate or
2. Not a QF

Is this a Qualifying Facility (QF) not selling to interconnected EDC at a PURPA rate?

NO 1. Not a QF

Is this a generator interconnecting to a non-OATT distribution facility?

1. On a distribution line with prior FERC jurisdictional sales or
2. On a transmission line

NO 1. Not a QF

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