



# Utility Override Clarification

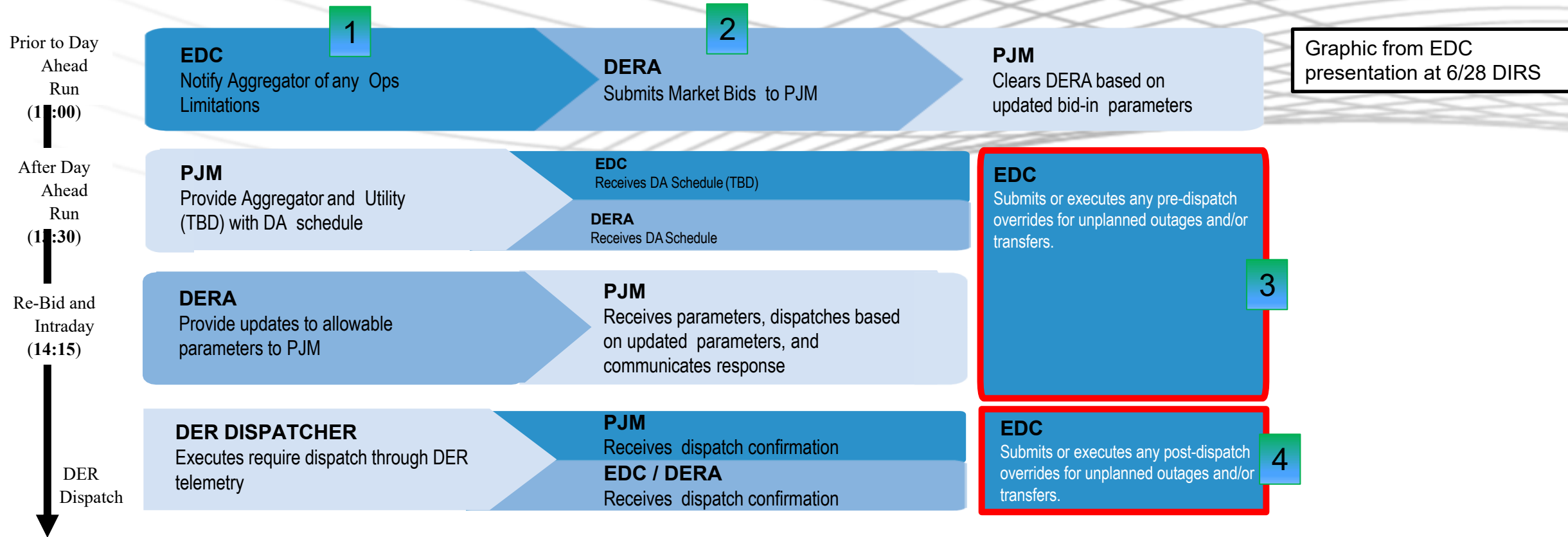
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## Expectations for Override

- EDC maintains sole responsibility for the reliable operation of the distribution system at all times and always maintains authority to override PJM's market dispatch.
- Aggregator must follow dispatch instructions from PJM unless they conflict with an EDC override, in which case the EDC dispatch takes precedence.
- PJM expects economic parameters from the aggregator to be in the form of a dispatchable range verified by the EDC prior to submittal.
- EDC should coordinate with aggregator on planned maintenance and other distribution work that will impact dispatchability of DER/DERA prior to day-ahead to allow aggregator to accurately reflect DERA capability in the market.

# Override Implementation: Time Frames



PJM views overrides in box 3 should be covered by 1+2 in most cases, updates to pre-dispatch directions should be done prior to Day Ahead, when possible. Box 4 captures real-time overrides for unplanned outages or transfers.

# 3 timeframes for Overrides

- 1. Registration / Utility Review Process:** Prior to approving an aggregation for market participation, EDCs review and approve a dispatchable range for the proposed aggregation.
  - Aggregations submitting ranges the EDC cannot reliably expose to PJM on a “normal” basis should be denied (or modified).
- 2. Day-Ahead:** Prior to day-ahead submittal, EDCs and Aggregators should coordinate an agreed upon range of MW dispatch per hour for DERA to submit to market.
  - MW levels impermissible by the EDC shall not be submitted in ECOMIN/ECOMAX.
- 3. Real-Time:** For reliability concerns, any action the EDC deems necessary shall be executed by the aggregate.
  - EDCs should provide explanation after the fact as to the reliability concern and need to override for both PJM and the Aggregator.
  - This transparency will be useful for understanding potential persistent issues with an aggregation’s operations.

Note: DERAs are not eligible for LOC or PAI excusals due to EDC override and will be subject to any applicable deviation changes / penalties.

- PJM expects to dispatch an aggregation within its agreed upon range (ecommin to ecomax) in day-ahead, based on PJM system needs and economic dispatch, unless there is an EDC declared “emergency”.
  - If an emergency is declared by the EDC, the aggregator shall follow EDC dispatch direction and update their economic parameters accordingly in PJM Markets.
  - PJM markets and pricing will react based on the aggregation’s submitted parameters
- The EDC can require additional controls for distribution reliability within the local interconnection process (override: registration).

- Each EDC has its own reliability criteria.
  - These are not determined by PJM, nor monitored or controlled by PJM.
  - Need for overrides to maintain reliability can be the result of unplanned outages or load beyond forecasted expectations.
  - Real-time overrides are expected to be abnormal and are tracked. Routine overrides may result in re-evaluating market participation levels.

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