

Continuous Model

106 – However, we agree with parties that PJM's proposal lacks the necessary detail regarding the participation of heterogeneous DER Aggregation Resources. While PJM has demonstrated that its DER Aggregator Participation Model will permit curtailing and injecting Component DER to participate in a heterogeneous aggregation and will compensate them for load reduction and provision of energy in both the energy and capacity markets, PJM's proposal does not include these market rules in the tariff. Proposed section 1.4B(n), which discusses how PJM will account for and settle heterogeneous DER Aggregation Resources, includes only a reference to the section of the tariff that governs the compensation and settlement of economic load participants, i.e., demand response. We find that this reference is insufficient to comply with the requirement of Order No. 2222 that each RTO/ISO revise its tariff to allow heterogeneous aggregations. The provisions referenced do not specify how PJM will account for and settle the energy injecting portion of a heterogeneous DER Aggregation Resource, or how PJM would distinguish the injection and curtailment capability in a heterogeneous DER Aggregation Resource for the purpose of energy market participation. Accordingly, we direct PJM to file, within 60 days of the date of this order, a further compliance filing that specifies market rules in its tariff regarding compensation and settlement of DER Aggregation Resources with both injecting and curtailment capability, including those that can reflect both attributes at a single Component DER site.

EDC Position and Response:

- The EDCs support PJM's position to utilize the single meter at the Point of Interconnection for all Component DERs at the premise.
 - The EDCs will need to meter these sites for retail billing and settlement purposes.
 - The EDCs have or may be investing significantly in AMI interval meters and related infrastructure, and this technology may be leveraged for this purpose.
 - In most cases investment in current interval metering and pulse services by CSPs can be utilized for export flow with minimal or no investment.
- The EDCs support reductions from Aggregated DER resources to follow the rules and requirements of PJM's current Demand Response products.
- The EDCs support grid injections to be measured quantities from the single meter to receive wholesale payments.
 - Additional discussions will be needed with PJM and the RERRAs regarding the reporting and regulatory treatment of the kWh injections receiving wholesale payments.
- It is critical that this is a transparent process such that all parties understand the roles and responsibilities and data needs of the component DERs participating in an Aggregation.