



PJM 2222 FERC Order Compliance

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DISRS

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P 44:

“We find that PJM’s tariff proposal requires limited, **additional clarification that its restriction applies only to injections and not load reductions**, and accordingly, as PJM proposes in its Answer, we direct PJM to...revise its tariff to specify that Component DER that participate in a net energy metering retail program may only participate with grid injections in the PJM ancillary services markets, and may not participate with injections in PJM’s energy or capacity markets.”

PJM proposes to revise Tariff, Attachment K-Appendix, Section 1.4B(b)(ii)(a) as follows:

Component DER that participate in a net energy metering retail program may only participate with grid injections in the PJM ancillary services markets, and may not participate with injections in PJM energy or capacity markets, unless...

P 91, 92:

“The Commission in Order No. 2222 did not mandate that each RTO/ISO revise its tariff to require DER aggregators to provide the RTO/ISO with specific information about each of the distributed energy resources. **If the RTO/ISO needs information about the individual distributed energy resources, however, then the RTO/ISO must first establish those information requirements in its tariff.** Further details regarding such information requirements may be included in the relevant PJM Manuals. [W]e direct PJM to ...revis[e] its tariff to establish any necessary information that must be submitted for the individual Component DER and identifying and explaining the proposed information requirements for the individual distributed energy resources as directed in the First Compliance Order.”



Information & Data Requirements – PJM Proposal

PJM proposes to revise Tariff, Attachment K-Appendix, Section 1.4B(b) to include informational categories and examples:

In order to participate in the energy, capacity, and/or ancillary services markets of PJM through the DER Aggregator Participation Model, a DER Aggregator shall register each DER Aggregation Resource and DER Capacity Aggregation Resource with the Office of the Interconnection, in accordance with the procedures established under the PJM Manuals. For each Component DER in a DER Aggregation Resource, the DER Aggregator shall provide:

- i. Identifying information such as the Electric Distribution Company account number and physical address;*
- ii. Metering information such as meter type (e.g., Electric Distribution Company meter, other meter);*
- iii. Capability information such as load reduction and injection capability.*

P 129:

“We direct PJM to ... explain[] why PJM’s proposal to trigger the 45-calendar day review on the DER Aggregator’s designation decision, as opposed to the EDC’s receipt of such designation, provides adequate and reasonable time for distribution utility review, consistent with Order No. 2222, or to propose alternative tariff language that complies with this requirement of Order No. 2222.”

PJM proposes to revise Tariff, Attachment K-Appendix, Section 1.4B(b) as follows:

*The second forty-five calendar day review period shall commence upon **receipt by the Electric Distribution Company of notification of** such designation by the DER Aggregator **from the Office of the Interconnection**, whereby the Electric Distribution Company shall review the DER Aggregation Resource and verify that the participation of the DER Aggregation Resource Component DER in the PJM energy, capacity, and/or ancillary service markets does not pose a threat to the reliable and safe operation of the distribution system, the public, or Electric Distribution Company personnel.*

Note that PJM considers the appearance of the applicable review item on the EDC's dashboard as "receipt of notification"; no additional acknowledgement of receipt will be required.

P 167:

“Although PJM states in its transmittal that ‘the decision to override PJM dispatch should be communicated by the Electric Distribution Company directly to the DER Aggregator as soon as practicable,’ **the proposed tariff language states only that the EDC ‘may communicate’ the override decision to the DER Aggregator. Accordingly, we direct PJM to...clarify why its proposal is non-discriminatory and transparent, or alternatively to revise the tariff language to require the EDC to communicate overrides to the DER Aggregator.**”

PJM proposes to revise Tariff, Attachment K-Appendix, Section 1.4B(f) as follows:

The Electric Distribution Company should ~~may~~ communicate the decision to override the physical operation of a DER Aggregation Resource or individual Component DER within a DER Aggregation Resource directly to the DER Aggregator.

PJM can facilitate the communication of the override decision between the Electric Distribution Company and the DER Aggregator under existing tools and processes, to the extent possible.



P 170:

“We find that PJM’s proposed tariff revisions lack specificity regarding the financial obligations that would apply to a DER Aggregator when an EDC overrides PJM’s dispatch. Accordingly, we direct PJM to...revise[] the tariff to specify the financial obligations that will apply when a DER Aggregation Resource does not perform due to a utility override..”

PJM proposes to revise Tariff, Attachment K-Appendix, Section 1.4B(f) as follows:

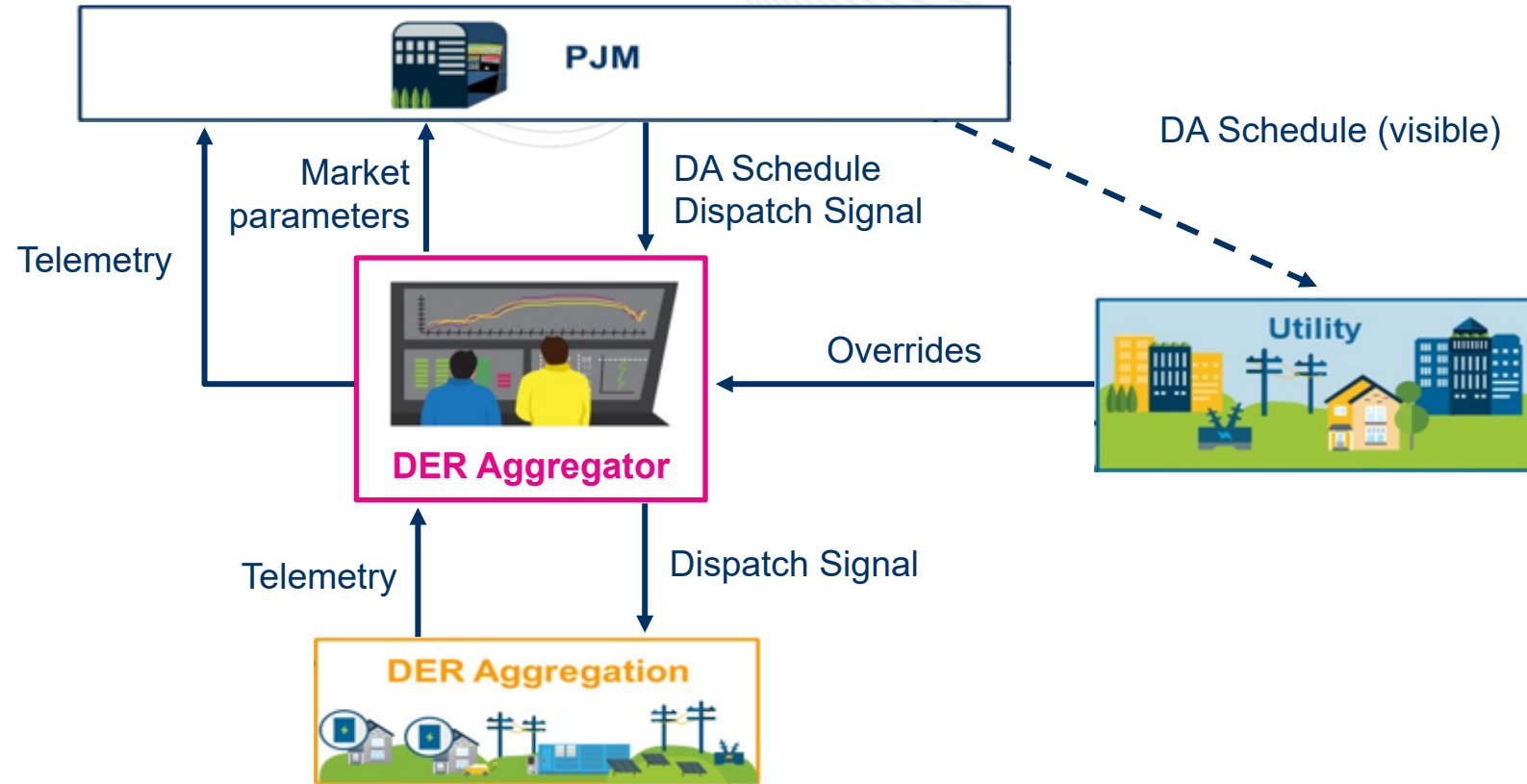
An Electric Distribution Company's override shall not excuse a DER Aggregator from any financial obligations for failure to perform under ~~the PJM Governing Agreements for failure to perform any of the obligations established under the PJM Governing Agreements or PJM Manuals for the relevant PJM capacity, energy, and/or ancillary services markets Tariff Attachment K-Appendix, Operation Agreement, Schedule 1, or Tariff Attachment DD, including balancing Operating Reserve and other performance charges, and capacity resource non-performance and test failure charges.~~

P 171:

“As to coordination between the distribution utility and the DER Aggregator, with respect to overrides during the Operating Day...we direct PJM to...clarify the inconsistency between its transmittal and its proposed tariff language. [←P 170]
As to coordination between PJM and the distribution utility, **PJM’s statement that PJM and the EDC will maintain informal communications does not comply with the directive of the First Compliance Order.** Order No. 2222 requires a process in the tariff for communication between the RTO/ISO and the distribution utility. Accordingly, **we direct PJM to...revise[] its tariff to establish a process for ongoing coordination, including operational coordination, that addresses data flows and communication between PJM and the EDC.”**

PJM proposes to revise Tariff, Attachment K-Appendix, Section 1.4B(f) as follows:

During the Operating Day, the Office of the Interconnection shall dispatch the DER Aggregation Resource, in accordance with the DER Aggregator's submitted bidding parameters. The Office of the Interconnection shall make available to the Electric Distribution Company the day ahead schedules for the DER Aggregation Resources in their territory.



- Due to the length of time it has taken for PJM to receive clarity from FERC regarding the DER Aggregation Participation Model design, the February 2, 2026 effective date for the energy & A/S market model is no longer feasible.
- PJM proposes to move the effective date for the full DER Aggregation Participation Model from February 2, 2026 to **February 2, 2028** in order to coincide with the effective date for capacity market participation.

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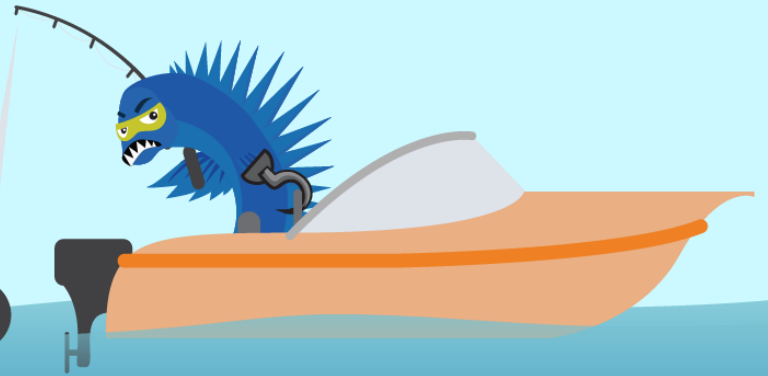
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