# Problems With Dual Participation and CBL Approach

# SODRSTF August 29, 2018

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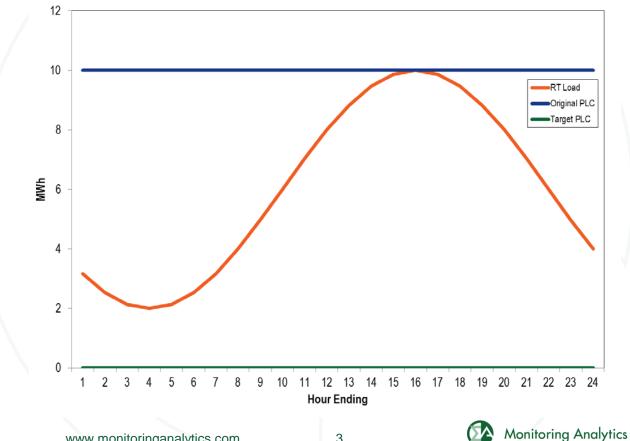
**Monitoring Analytics** 

## **Participation Scenarios**

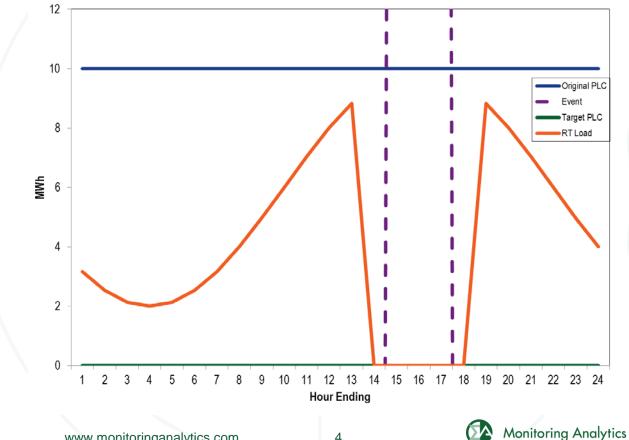
- Single Product
  - Full participation
  - Partial Participation
- Dual Participation



## **Full Participation, No Event**



### **Full Participation, Event**

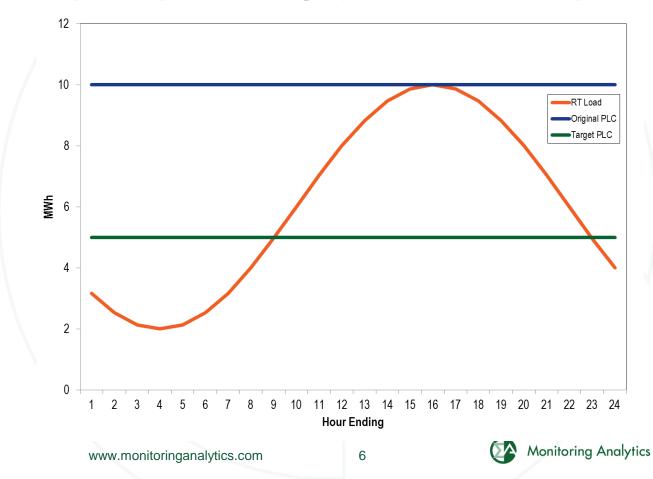


# **Full Participation**

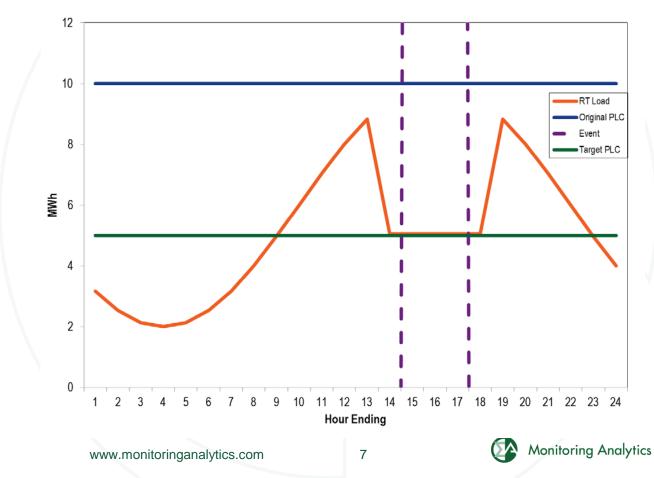
- All capacity MW fully allocated
- Allowing participation with another program is double counting capacity MW



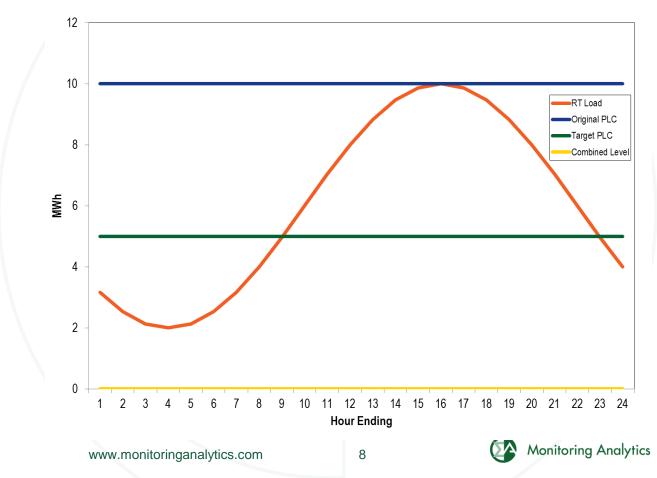
#### Half Participation, No Event



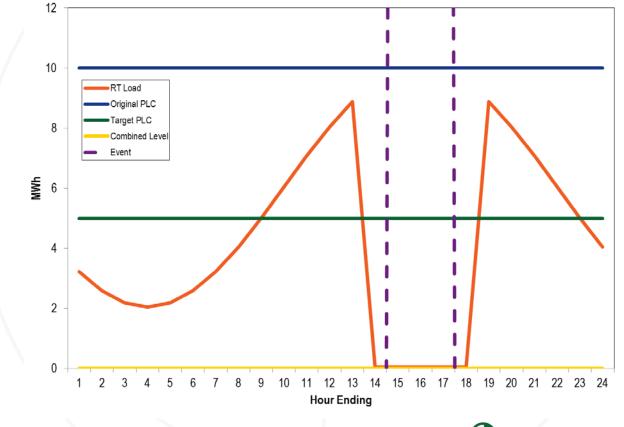
#### Half Participation, Event



## **Dual Participation**



### **Dual Participation, Event**



# Results

- Same outcome as full participation in a single product
- No reason to allow participation across product types
- Participants must pick one product type
- Allowing dual participation results in potential gaming and FERC referrals



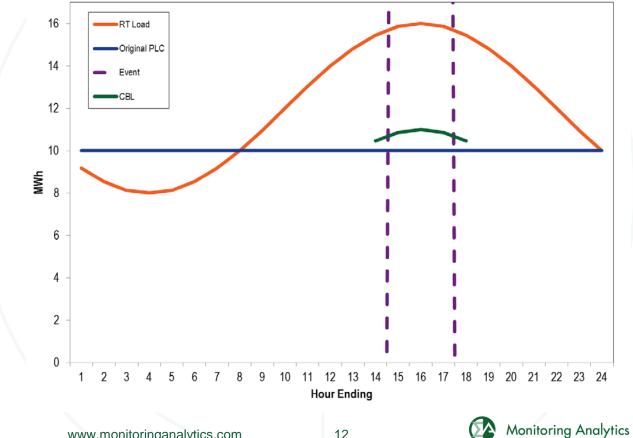
# **CBL M&V Complications**

- "...referenced to a baseline that is the lesser of a customer's PLC, or comparison load, PJM has ensured that resources will respond to peak period emergencies in a manner consistent with the RPM procurement process." ER11-3322-000 (Nov 4, 2011)
- Proposals should not count reductions from above PLC
- Measuring energy reductions to shift VRR curve is inconsistent with the RPM procurement process

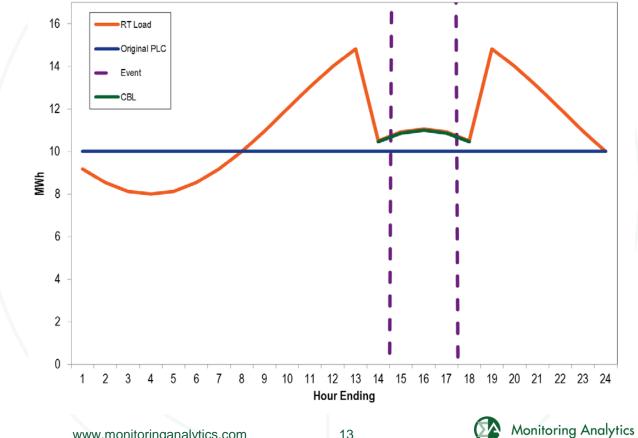




# **CBL** Approach



### **CBL Above PLC**



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