



M-13 & M-14D Clarification Updates to Non-Retail Behind the Meter Generation Business Rules

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- Updates to Emergency Operations (M-13) and Generator Operational Requirements (M-14D) are proposed to clarify the reporting, netting, and operational requirements of Non-Retail Behind the Meter Generation
- Proposed updates are intended to ensure Member and PJM responsibilities, processes, and procedures related to Non-Retail BTMG are clear and adequately captured in PJM manuals
- Proposed updates are not intended to change the terms of the 2005 Settlement Agreement (EL05-127)
- Proposed updates are the result of Key Work Activities 1 & 2 of the Non-Retail BTMG Business Rules Issue Charge assigned to Operating Committee

- Updates proposed to Emergency Operations (M-13) to clarify which emergency procedures trigger the requirement to load Non-Retail BTMG
- Maximum Generation Emergency Action and Deploy All Resources Action trigger the requirement to load Non-Retail BTMG for either capacity shortages or transmission security emergencies.
- Impacted sections in M-13:
 - Section 2.3 Capacity Shortages - Sections 2.3.2 Real-time Emergency Procedures, Step 4A (Real-time) Maximum Generation Emergency Action & Step 7 (Real-time) Deploy All Resources Action
 - Section 5.3 Transmission Security Emergency Procedures - Step 4A (Real-time) Maximum Generation Emergency Action & Step 7 (Real-time) Deploy All Resources Action

- Updates proposed to Generator Operational Requirements (M-14D) to clarify the reporting, netting, and operational requirements of Non-Retail BTMG.
- Impacted section: Appendix A, Behind the Meter Generation Business Rules

Business Rule(s)	Summary of Update
#25	<ul style="list-style-type: none"> Clarify that net load (gross load minus operating BTMG, not less than zero) is able to be used in determination of charges for energy, ancillary services, capacity, transmission, and administrative fee charges
#29	<ul style="list-style-type: none"> Clarify that Load Serving Entity (LSE) that has Non-Retail BTMG that may be used to net against a wholesale area load must have Network Integration Transmission Service (NITS) agreement with PJM
#30 - #40	<ul style="list-style-type: none"> Establish process for a LSE that serves wholesale area load to report Non-Retail BTMG ≥ 0.1 MW that is located in wholesale area
#41- #52	<ul style="list-style-type: none"> Clarify that Non-Retail BTMG netting is subject to a threshold amount in the determination of LSE's network service peak load (NSPL) and obligation peak load (OPL) Establish the processes to facilitate a reduction in the amount of operating Non-Retail BTMG that is allowed to net in the EDC's determination of NSPL and OPL data for LSEs serving wholesale area load



Summary of M-14D, Appendix A Updates (Continued)

Business Rule(s)	Summary of Update
#53 - #54	<ul style="list-style-type: none">• Clarify that after the 3000 MW cap is reached, any new Non-Retail BTMG units reported are ineligible to net against wholesale area load• Establish process to facilitate the ineligibility to net in the EDC's determination of NSPL and OPL data for LSEs serving wholesale area load
#55 - #71	<ul style="list-style-type: none">• Clarify the operational requirements of Non-Retail BTMG, including which units are subject to a performance compliance evaluation and the expected performance level.• Establish process to facilitate PJM's determination of units that failed to perform• Establish a process to facilitate a reduction in the amount of operating Non-Retail BTMG that is allowed to net in the EDC's determination of NSPL and OPL data for LSEs that had Non-Retail BTMG located in wholesale area that failed to perform.



Additional Updates to Address Stakeholder Concerns

Business Rule(s)	Summary of Update
#28	<ul style="list-style-type: none">Added “Non-Retail BTMG does not include a generation facility that is dedicated to a retail end-use program that directly offsets retail charges under regulations promulgated by a Relevant Electric Retail Regulatory Authority (e.g., Net Energy Metering, Community Solar, or Aggregate Net Energy Metering programs).”
#31	<ul style="list-style-type: none">Added “provide all requested data in the template to the extent the LSE or EDC holds or after best efforts can obtain the requested data. If an LSE or EDC demonstrates to PJM that a generator agreement prior to 2005 contains confidentiality requirements that prohibit the disclosure of certain data requested in the template, the LSE or EDC shall not be required to provide such data.”
#30, 31, 34, 38, 39, 42, 44, 45, 46, 47, 51, 54, 55, 58, 59, 62, 63, 64, 65, 66, 67, & 70	<ul style="list-style-type: none">Clarified processes and EDC’s role when there are multiple LSEs that serve load in a modeled EDC wholesale area or multiple LSEs that serve load in the Rest of the Zone (i.e., Zone minus the modeled wholesale areas in the Capacity Exchange system)

- First Read:
 - 6/11/2019 OC
 - 6/27/2019 MRC
 - 7/02/2019 SOS
- Endorsement:
 - 7/02/2019 SOS
 - 7/09/2019 OC (Deferred to 8/06/2019)
 - 7/31/2019 SOS (Review)
 - 8/06/2019 OC
 - 8/22/2019 MRC (Deferred to 09/26/2019)
 - 09/26/2019 MRC