

Load Management 30 minute notification time guidelines and information needed by PJM for CSP exception request

This form will be used to allow CSPs to request advance clarification (prior to registration process) on whether or not a specific customer situation will qualify for one of the four defined exceptions and therefore be permitted a notification time of 60 or 120 minutes, as necessary. Please email your specific request to dsr_ops@pjm.com and include the information outlined below. **This document will be updated over time based on outcome of exception requests from CSPs.**

Background:

Effective with the 2015/2016 Delivery Year, load management will be required to fully respond within 30 minutes of notification unless an exception request for 60 or 120 minute notification time is approved by PJM. If qualified for one of the following exceptions, the CSP shall elect either a 60 or 120 minute lead time based on the resources physical capability to provide the load reduction. The intent of these exemptions is to accommodate resources with legitimate, physical reasons as to why the load reduction cannot be achieved in 30 minute notification time period and require up to 120 minutes to fully provide the load reduction. Curtailment Service Providers and/or their underlying resources may need to change their existing processes (including training and deploying additional people but not hiring new people) to be able to respond in 30 minutes and therefore participate as a load management resource.

Exception Definition:

- 1) Damage (feedstock/equipment/product) - The manufacturing processes for the Demand Resource require gradual reduction to avoid damaging major industrial equipment used in the manufacturing process, or damage to the product generated or feedstock used in the manufacturing process.
 - a. This should represent unavoidable significant damage to feedstock, equipment or product used in manufacturing process.
- 2) Transfer of load to backup generator -Transfer of load to back-up generation requires time-intensive manual process taking more than 30 minutes.
- 3) Safety Issue - On-site safety concerns prevent location from implementing reduction plan in less than 30 minutes
 - a. This should be for expected safety violation such as OSHA standards/laws.
- 4) Mass Market communication - The Demand Resource is comprised of mass market residential or Small Commercial customers which collectively cannot be notified of a Load Management event within a 30-minute timeframe **due to unavoidable communications latency**, in which case the requested notification time shall be no longer than 120 minutes.
 - a. Mass market represents pool of customers that are dispatched/notified (same offer price) and administered the same way throughout the process. "Small Commercial Customer, shall mean a commercial retail electric end-use customer of an electric distribution company that participates in a mass market demand response program under the jurisdiction of a RERRA and satisfies the definition of "small commercial customer" under the terms of the applicable RERRA's program, provided that the customer has an annual peak demand no greater than 100kW.

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FAQ

- 1)** Q: If I have contract or RERRA tariff that stipulates 1 hour lead time will that qualify for exception?
 - a. A: No, exceptions are based on 4 defined exceptions.

- 2)** Q: If persons that manually implements load reduction is not at plant during certain hours and it will take the person time to get to plant to reduce load in certain hours which require more than 30 minutes will that qualify for exception?
 - a. A: No, any delay in implementing load reduction because of staffing availability is not considered a physical limitation. Physical limitations are meant to represent physical limitation to the equipment that will be reduced.

- 3)** Q: If back-up generator is not staffed and it will take more than 30 minutes for person to get to facility to start generator will that qualify for exception?
 - a. A: Maybe, CSP should deploy additional people, as necessary, to have generator turned on and load transferred. This could mean that person that typically turn on generator goes to location during hot weather alerts instead of waiting until resource is actually dispatched. An existing process that takes longer than 30 minutes to deploy does not automatically mean the generator will qualify for an exception. If no additional people can be made available to get generator up and running and load transferred without hiring new people then resource may qualify for exception.

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CSP information required for PJM to evaluate – please provide the following minimum information which depends on which exception you request. The more information you can provide on the specific situation the quicker it will be to evaluate whether or not it qualifies for the 30 minute exception.

- 1) Damage (feedstock/equipment/product)
 - a. What does location do (at this specific address)?
 - b. What will be damaged (feedstock/equipment/product) and how will it be damaged?
 - i. Is it possible to change process so that a 30 minute response would not cause damage? What is expected cost to implement the change?
 - c. How do you know feedstock/equipment/product will be damaged? Is this based on estimate, past experience, engineering/specifications?
 - d. What is expected cost/level of effort to fix damaged item or replace feedstock?
- 2) Transfer of load to backup generator
 - a. Provide generator specifics (vintage, type of unit and process to transfer load to generator) and exactly why load cannot be transferred to generator in 30 minutes
 - b. What is expected cost/level of effort to be able to respond in 30 minutes (\$)
- 3) Safety Issue
 - b. Identify the specific safety issue
 - c. Are there any other ways to mitigate safety risk and what is expected cost/level of effort?
- 4) Mass Market communication
 - a. Identify type of customers and confirm all commercial customer will have peak demand value less than 100kw. Provide breakdown of expect number of customers that are residential vs commercial.
 - b. Provide description of customer program and whether this is part of RERRA program/tariff
 - c. Detailed description of communication method and evidence that CSP cannot notify customers in 30 min. How was the communication method determined (is it a contractual requirement, utility commission mandate, etc.)?
 - d. Provide estimated cost/level of effort on what it would take to be able to notify all customers in 30 minutes