Metering & Telemetry

249. PJM's proposal partially complies with the requirement to revise its tariff to establish market rules that address metering requirements necessary for distributed energy resource aggregations to participate in RTO/ISO markets and to explain why its proposed metering requirements are just and reasonable and do not pose an unnecessary and undue barrier to individual distributed energy resources joining a distributed energy resource aggregation.

We find that PJM's basic description of its metering practices for DER Aggregation Resources in its tariff is incomplete because it lacks the deadline for meter data submission for settlements.

250. ***AEE and SEIA argue that PJM should adopt an additional option for DER Aggregation Resources to utilize device-level meter data.*** As AEE and SEIA acknowledge, PJM has proposed metering options for DER Aggregation Resources, including the use of a representative sample of Component DER for non-interval metered residential DER Aggregation Resources. We find that PJM has demonstrated that its proposed metering requirements do not pose an unnecessary and undue barrier to distributed energy resources, as Order No. 2222 requires, with the narrow exception discussed further above.

However, we encourage PJM to continue to work with its stakeholders to consider additional metering options in the future, including for DER Aggregation Resources to utilize device-level meter data.

FERC found PJM's practices in its tariff incomplete because they: 1) did not include a deadline for meter data submission for settlements; and 2) did not explicitly indicate that a DER Aggregation under 10 MW that is only participating in the energy market is exempted from telemetry requirements. Compliance filing required. PJM will address telemetry for sizing.

EDC Response and Position:

PJM's proposed compliance filing efforts do offer additional clarity to Metering and Telemetry requirements. However, as discussed on the 5/25/23 DISRC call, more detail will need to be discussed. Timing of data for PJM purposes needs to be compared to timing of data for EDC purposes if BTM customer devices will be exporting to the grid and that export is recognized at the EDC premise meter. Unlike DR where load reductions simply reduce load, exported power at the premise meter will cause some major billing system changes for all of the EDCs and LSEs. Timing of data exchanges, data validation, data formats are only a few examples of items needing further discussion.