

Comments for PJM 2222 Compliance Filing in Response to FERC

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Operational Coordination on Overrides

- Our experience supports PJM's proposal for EDCs to be responsible for managing overrides and PJM maintaining an informal role in operational coordination of overrides.
- We agree that some mechanism to prevent aggregators from penalty for not meeting bid during override is appropriate. We have no position on whether PJM should adjust the aggregator's active bid or to allow aggregator to do so.
- To meet the requirement of non-discrimination and transparency outlined in point 167 of 188 FERC ¶ 61,076, PJM should specify a limit on overrides per EDC.
- We suggest 70 events/year, with single events required to be no more than one hour. Contracts for override between EDC and aggregator should allow parties to mutually agree to different terms.

Metering and Telemetry System Requirements

- For information on performance of storage DERs participating in Ancillary Services only (with no energy settlement per 188 FERC ¶ 61,076 p. 17), preferred information source is revenue-grade certified submeters on each DER.
 - Utility premises meters generally do not have either the time resolution or power measurement needed for A/S.
- Submeters should measure energy and power, be certified as revenue grade, reported by telemetry, and have time resolutions appropriate to the market, e.g. 2 seconds for Reg-D.

Terminology: A/S with no Energy Settlement

- FERC confirmed “Component DER that participate in a net energy metering retail program and also participate with grid injections in the PJM ancillary services market will be excluded from PJM energy market settlements” (188 FERC ¶ 61,076 p. 17)
- UD has been participating in such a PJM market for several years, often called “Regulation Only”
- In communicating and writing about this market, we find the use of “only” leads to ambiguity and confusion in both written and verbal communication.
- As an alternative example, if the modifier were “response” the non-energy markets would be “Regulation Response”, “Reserves Response”, and “Ancillary Services Response”
- This point is not a FERC compliance matter, but we suggest that PJM adopt this or similar nomenclature to disambiguate manuals, training, and communication to stakeholders.

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