Efficiency of DR Registration Process

DRS
1/24/2013
• MIC approved issue statement/charge on 1/9/13 and assigned to DRS.
• Timeline – “in time for use in 2013 registration timeline”.
1) Assess continuing need for LSE review of emergency and economic DR registrations

2) Identify impediments to DR registration process associated with identifying customer energy supplier (“LSE”).

3) Determine the parties with complete supply information, and whether they are authorized to use that information to assist in the registration process.

4) Develop enhancements to registration process that reduce effort required to address changing supplier information, including elimination of LSE review and/or identification requirement.
Draft Stakeholder Process & Schedule

Education of current process

Feb/Mar

Feb/Mar

Mar/Apr

Mar/Apr

Apr/May

Apr/May

May-Aug

Pros/Cons of solutions

Proposals to stakeholder process for endorsement

Develop solutions aligned to issues/interests

identify interests, refine issues

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## EDC and LSE review process roles

<table>
<thead>
<tr>
<th>Item</th>
<th>EDC</th>
<th>LSE</th>
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<tbody>
<tr>
<td>EDC</td>
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<tr>
<td>LSE</td>
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<tr>
<td>EDC Account Number</td>
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<tr>
<td>RERRA policy on participation</td>
<td>✔</td>
<td>✔</td>
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<tr>
<td>EDC interval meter</td>
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<tr>
<td>Line Loss factor</td>
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<tr>
<td>Peak Load Contribution (PLC)</td>
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<tr>
<td>Contractual Obligation</td>
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LSE review of Contract Type and Retail Rate were eliminated 4/1/12 with implementation of Order 745
Why is LSE in current registration process?

- Economic Registration – cleared day ahead offers used to apply negative dec (i.e.: sell) transaction against LSE account.
  - This is automatically done to help LSE not be long in day ahead market
- Contractual Obligation (Economic and Emergency)
  - May not preclude participation but require special settlements
  - Intention was to handle legacy utility curtailment rates where customer receives discounted rates and member other than LSE would like to register
- Double check on RERRA policy administration
- Potential for other double checks on data

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CSP Submits Registration via eLRS

LSE Reviews Registration 10 Business Days via eLRS and provides Status

EDC Reviews Registration 10 Business Days via eLRS and provides Status

Large EDC: eLRS Auto Confirms Registration
Small EDC: eLRS Auto Denies Registration

eLRS Database

eLRS emails LSE and EDC

eLRS sends reminder emails 2 days prior to close of window to LSE and EDC
Key Registrations differences

Economic Registration

- May be submitted at any time
- LSE designation results in negative dec for day ahead cleared offers

Emergency Registration (Capacity)

- Must be submitted by mid May – all approvals done prior to 6/1
- PLC must be accurate
- RPM credit requirements (“existing DR”)
How is LSE identification administered?

- Location Data (not contingent on type of registration)
  - EDC, Zone, EDC acct number
  - Address
  - DR capability
  - Business Segment
- Registration Data (specific to registration)
  - LSE
  - Registration specifics
How are LSE changes handled today?

• Economic Registration
  – CSP must terminate the registration, copy to new registration and include new LSE

• Emergency Registration
  – Prior to start of DY, same as Economic process
  – After start of DY, no changes are made to registration

CSP is responsible to always know effective LSE and create new registrations accordingly
Registration review workflow

- **CSP submit registration**
  - May allow LSE or EDC to update registration during review ("approved as modified")
- **EDC reviews registration**
  - Update if allowed
  - Approve/Deny
    - Designate specific denial reason so CSP understands
  - Do nothing
    - Automated approval/denial from RERRA rules
- **LSE reviews registration**
  - Same as EDC review process but except for denial reasons
- **Denied Registrations go back to CSP to determine if CSP would like to fix and resubmit**
  - Registration goes back through full review since no specific time limit on resubmission of registration and data may change which requires member to review.

Complicated workflow based on variety of timelines where 3 different members may be involved with different roles depending on type of registrations where each user may have different access rights
Creating a Location (Site tab):

- Complete all highlighted fields under the Site tab in the Location Details page (note dropdown selections on some fields).

Selecting these fields will allow the EDC or LSE to upload meter data to the system for the CSP.
Registration (CSP perspective)
Registration (CSP perspective)
Registration (CSP perspective)

The image shows a screenshot of a web application interface for registration details. The interface includes fields for registration details such as:

- **Registration ID:** DR Test Site 3
- **Effective Date:** 06/01/2010
- **Termination Date:** 05/31/2011
- **Program:** Emergency DR Full (6/1/10-5/31/11)
- **CSP:** ECONCT
- **Status:** New
- **Hold Status:**

Additional fields include:

- **Peak Load Contribution (kW):** 105.0
- **Capacity Loss Factor:** 1.33

The compliance section includes:

- **Capacity Type:** DR
- **Load Time:** Long
- **RPM DR Resource:** ECONCT DR PECO2
- **Area:** PECO

The measurement section includes:

- **Method:** Guaranteed Load Drop
- **Managed Load:** 124
- **Nominated ICAP (kW):** 105
Registrations (LSE perspective)

Registration process (LSE):

- The LSE needs to view/verify/approve/deny the registration.
- The LSE needs to verify that the locations within the registration are not prohibited from participation based on a contractual obligation with the LSE.
Registration process (LSE):  
- The Decision tab gives the LSE the ability to Approve or Deny the registration.  
- If denied, select Denial Reason and add comments.  
- Click the ‘Action’ button and select ‘Complete Task’ to submit.
• LSE does not understand why they are included in the process and does not review
  – registrations always wait for 10 business days to finalize
  – LSE set up in eLRS
• LSE may or may not be aware (or want) negative dec for day ahead activity
• CSP is not aware of LSE changes
• LSE rejection of registration if LSE contract term different from registration term
  – Customer does not know future LSE yet
• Current LSE change process takes effort
• Questions about wholesale vs retail LSE and POLR type auctions
• Denied registrations go back through complete EDC/LSE review process if resubmitted
  – More time to get a registration approved & resource into market.
• What part of process requires most effort?
  – Pull together analysis as needed to help focus priorities
• Administrative vs Manual vs Tariff changes
• eLRS system changes may not be feasible in short term
  – Depends on complexity & current queue
• Majority of Emergency DR registrations submitted within next 3 months