Determination of CBL used for DR CP non-summer capacity compliance

DRS
New CP DR specific measurement and verification rule

• Summer capacity compliance calculation – no change, do same as today
  – Load Reduction = PLC – (load * losses)

• NEW: Non-summer capacity compliance calculation
  – Load Reduction = (CBL – load) * losses

• New CP DR rules leverage Economic CBL rules

Change made to ensure load reductions occur during non-summer month
• Economic CBL rules established for Economic DR resource
  – Voluntary availability based on CSP preference
• All CP registrations (or potential substitutes) required to perform RRMSE test
  – 60 days of load data (primarily provided to CSP by EDC with customer consent)
  – <20% RRMSE, otherwise alternative CBL process
    • Ultimately PJM determined CBL if no accurate CBL available
Emergency Energy M&V proposed change
(Prior DRS effort put on hold because of EPSA)

- DRS approved emergency energy M&V changes to improve accuracy across wider dispatch periods and balance member effort
  - Eliminate hour before method
  - Use default Economic CBL (3 day type with symmetric additive adjustment) as default for all Emergency DR registrations
    - If economic and emergency registration use economic CBL unless MBL then use Emergency CBL.
  - Eliminate RRMSE requirement unless intend to use Alternative CBL
  - Economic Alternative CBL process applicable to Emergency registrations

Intention was to leverage this approach for non-summer capacity compliance
• Load Management default CBL for all registrations used for non-summer capacity compliance calculation is default economic CBL
  – 3 day type with symmetric additive adjustment
• RRMSE test is not required for Load Management registrations
• Load Management CBL is used for non-summer capacity compliance if Economic CBL is MBL (max base load)
• CSP or PJM may still utilize alternative CBL process defined in tariff
  – RRMSE Test is required
  – Alternative to be finalized by 10/1 or as approved by PJM

Emergency energy CBL rules will stay the same ("wait and see" approach for EPSA outcome)
### Stakeholder Process proposed timeline

Need to resolve before start of 15/16 DY.

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