Duplicate Process

DRS
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2 Identified Issues

1. Registrations are terminated by process once both CSPs affirm.
   - May have eRPM transactions that need to be unwound first ("Completed" checkbox checked)
   - CSP that keeps registration must set up new registration and re-do any eRPM transactions

2. Difficult for CSP to figure out who other CSP is so they can call and work out.
No Problem Statement needed

• Issue #1 – “Completed” checkbox checked
  – Duplicate Registration Process terminates with “Completed” checkbox checked
    • If both CSPs affirmed, PJM will: contact both CSPs to
      – Contact both CSPs to request contracts, contact end-use customer who determines the CSP
      – Correct CSP’s registration will be put back into status prior to duplicate (Pending, Confirmed)
      – Contact Capacity Markets team to unwind any transactions as needed
    • If both CSPs withdrew
      – PJM contacts CSP and Capacity Markets team to unwind any transactions

Avoids unnecessary eRPM transaction unwinding, No M11 changes needed
Additional Process Enhancements

• Add new status “Terminated – Duplicate”
  – Differentiate between normal Termination and termination as result of duplicate review process
  – Allow resubmission in this status to avoid extra steps of copying, then re-submitting registration
  – When re-submitted, if any fields were approved by the EDC or LSE previously, they will remain approved

Avoids unnecessary EDC/LSE reviews, No M11 changes needed
Solution will need Problem Statement/Issue Charge

• Issue #1: “Completed” checkbox not checked
  – If both CSPs affirm (i.e. both registrations will terminate), allow X number of days before termination
    • Email both CSPs that X number of days have been added and update Duplicate Task Due Date
    • Allow CSP to change affirm/withdraw
Solution may need Problem Statement/Issue Charge

• Issue #2
  – No Problem Statement needed
    • Add new field at Org/User level to indicate person(s) to contact when registration is in duplicate status
      – Voluntary disclosure of contact information
      – If user is checked to release info, CSP name, email and phone are included on Duplicate Review notification email to other CSP.
  – Problem Statement needed
    • Solution that changes the confidentiality of CSP information
Demand resources may switch CSPs. The CSP registering the switching Demand resource shall provide PJM with the registration information of the resource. Registrations may only be submitted when there is an effective contract with the customer for the term and product on the registration. CSP will check their records to ensure they have an effective contract to support the registration and contact customer as appropriate before they submit the registration. PJM will treat the switching as a new registration. If the current registration is a full emergency or full Pre-Emergency registration and the Delivery Year has begun, the new registration will be denied. Both new and current CSPs will be notified by PJM of the switch and will be given 5 business days to affirm they have a valid contract with the end-use customer for the term and product as included on their registration and notify PJM through the appropriate system that the customer has affirmed the contract. After 5 business days, if only one CSP has affirmed their registration in the appropriate PJM system, that CSP’s registration will continue and the other registration will be terminated as soon as possible. If both CSPs have affirmed their registration, both registrations will be terminated as soon as possible. In order to accommodate day-ahead load response the switch or termination will become effective at 0001 of the third business day after the previous registration is terminated or deemed terminated by PJM. The previous registration will remain active for the sole purpose of settlement of load reductions that occurred before the switch became effective.
Appendix
1/2/2018 through 5/31/2018 Duplicates

- 93 unique customers involved in duplicate process
- Number of times a customer went through duplicate process:

<table>
<thead>
<tr>
<th>Number of times in Duplicate Reviews</th>
<th>Number of Customers</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>75</td>
</tr>
<tr>
<td>2</td>
<td>11</td>
</tr>
<tr>
<td>3</td>
<td>6</td>
</tr>
<tr>
<td>4</td>
<td>1</td>
</tr>
</tbody>
</table>

- Registrations confirmed for year: 13,433. with 0.69% involved in duplicate review process
- PJM involved in duplicate process—11 customers (11.8% of duplicates)
Number of Duplicates Submitted by Week

![Graph showing number of duplicates submitted by week. The x-axis represents weeks from January 1, 2018 to May 31, 2018, and the y-axis represents frequency. The graph shows a significant increase in duplicates submitted from late March to late May.]
CSP duplicate registration escalated to PJM to resolve:
- All CSPs produced signed contracts immediately
- Most customers “forgot” they had signed multi-year contract more than 1 year ago
- Most needed time to consult with both CSPs and attorneys
- All customers were aware that they had 2 CSPs
Known Issues

• Registrations marked “Completed” can be terminated by process (both CSPs affirm).
  – May have eRPM transactions that need to be unwound first
• One CSP suggested they need more time to resolve after 2\textsuperscript{nd} CSP affirms to allow resolution before system automatically terminates both registrations
• A couple of CSPs mentioned it is difficult to figure out who other CSPs is so they can call and work out.