Duplicate Registration Process

DRS
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8/30/2018
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.
Solutions for 2019/2020 Delivery Year

• Any Duplicate Registration Process terminates with “Completed” checkbox checked
  • If both CSPs affirmed, PJM will:
    – Contact both CSPs to understand situation and offer to put CSPs in contact with each other with CSP’s approval
    – After resolution, the correct CSPs registration will be put back into status prior to duplicate review process (Pending, Confirmed)
    – PJM contacts 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
DR Hub Enhancement targeted for early 2019

• New status “Terminated – Duplicate”
  – Clear indication registration terminated as result of duplicate review process (occurs when both CSPs affirmed, CSP withdrew, or did not take action on duplicate review task)
  – Allow resubmission in this status to avoid extra steps of copying, then re-submitting registration (similar to current rules for Withdrawn and Denied status)
  – 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
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
• 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.
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.