

Clarifications Needed in Existing Non-Retail BTMG Business Rules

Theresa Esterly
Sr. Lead Engineer, Capacity Market Operations
OC Meeting
May 14, 2019

Clarifications in Reporting Requirements

Location of Requirement	Requirement	Clarifications Needed
<ul style="list-style-type: none"> OATT 34.3 Netting of Non-Retail Behind The Meter Generation RAA Schedule 8 Determination of Unforced Capacity Obligations 	<p>Network Customer required to report information as is required to facilitate the determination of its NRBTMG Netting Credit in accordance with the procedures set forth in the PJM Manuals.</p>	<ul style="list-style-type: none"> No clear process for reporting or updating Non-Retail BTMG information currently exists in a manual Need to clarify that it is a mandatory reporting requirement for Non-Retail BTMG ≥ 0.1 MW No process to report generation output data for 1 CP and 5CP hours to facilitate determination of netting credit currently exists in the a manual
<ul style="list-style-type: none"> OATT Schedule 15 Non-Retail Behind The Meter Generation Maximum Generation Emergency Obligations RAA Schedule 16 Non-Retail Behind the Meter Generation Maximum Generation Emergency Obligations 	<p>Network Customer required to report scheduled outages of the resource prior to the occurrence of such outage in accordance with the time requirements and procedures set forth in the PJM Manuals.</p>	<ul style="list-style-type: none"> No time requirements and procedures specific to reporting outages for Non-Retail BTMG currently exist in a manual
<ul style="list-style-type: none"> OATT Schedule 15 Non-Retail Behind The Meter Generation Maximum Generation Emergency Obligations RAA Schedule 16 Non-Retail Behind the Meter Generation Maximum Generation Emergency Obligations 	<p>Network Customers shall report the output of the NRBTMG resource during each Maximum Generation Emergency condition in which the resource is required to operate in accordance with the procedures set forth in PJM Manuals.</p>	<ul style="list-style-type: none"> No procedures or deadlines to report generation output data after a Maximum Generation Emergency condition currently exist in a manual



Clarifications in Netting Requirements

Location of Requirement	Requirement	Clarifications Needed
<ul style="list-style-type: none"> OATT 34.3 Netting of Non-Retail Behind The Meter Generation RAA Schedule 8 Determination of Unforced Capacity Obligations 	<p>If the total amount of NRBTMG in the PJM Region exceeds the Non-Retail Threshold, the amount of operating NRBTMG a Network Customer may net shall be adjusted according to the following formula:</p> $\text{Network Customer Netting Credit} = \frac{(\text{Non-Retail Threshold} / \text{PJM NRBTMG}) * \text{Network Customer operating NRBTMG}}$	<ul style="list-style-type: none"> Clarify what rating (e.g., nameplate rating) is used to determine the amount of NRBTMG in PJM. Clarify netting adjustment process in manual to ensure all parties understand responsibilities and EDC has all information required to incorporate a netting adjustment in EDC's procedures for calculating LSE's OPL & NSPL values.
<ul style="list-style-type: none"> OATT 34.3 Netting of Non-Retail Behind The Meter Generation RAA Schedule 8 Determination of Unforced Capacity Obligations 	<p>The total amount of Non-Retail Behind The Meter Generation that is eligible for netting in the PJM Region is 3000 megawatts. Once this 3000 megawatt limit is reached, any additional Non-Retail Behind The Meter Generation which operates in the PJM Region will be ineligible for netting under this section.</p>	<ul style="list-style-type: none"> Clarify netting adjustment process when 3000 MW cap is reached in manual to ensure all parties understand responsibilities and EDC has all information required to ensure that ineligible operating NRBTMG is not allowed to net in EDC's procedures for calculating LSE's OPL & NSPL values.



Clarifications in Operational Requirements

Location of Requirement	Requirement	Clarifications Needed
<ul style="list-style-type: none"> OATT Schedule 15, NRBMTG Maximum Generation Emergency Obligations RAA Schedule 16, NRBMTG Maximum Generation Emergency Obligations 	<p>A NRBMTG that has output that is netted from load for purposes of determining LSE’s NSPL or OPL is required to operate at full output during first 10 times between Nov 1 and Oct 31 that Maximum Generation Emergency (MGE) conditions occur in the zone in which Non-Retail BTMG is located.</p>	<ul style="list-style-type: none"> NRBTMG output during 1CP and 5CP hours is needed for PJM to determine if a specific NRBMTG has requirement to operate during the next Nov 1 through Oct 31 period Need to clearly define the expected performance level during a emergency condition in a manual and ensure process in place to ensure such MW level is reported to PJM
<ul style="list-style-type: none"> PJM Manual 14D, Appendix A: BTMG Business Rules, Business Rule 33 	<p>33. Each calendar year, netting NRBMTG resources shall be required to operate during the first ten occurrences of Maximum Emergency Generation (MEG) conditions in the zone in which the resource is located. This obligation applies to an MEG condition called for either generation or transmission emergencies. Notice of an MEG event shall be communicated through the PJM all-call system.</p>	<ul style="list-style-type: none"> “Each calendar year” and “Maximum Emergency Generation” language in manual inconsistent with agreement language which states requirement to operate during first 10 occurrences between Nov. 1 through October 31 that Maximum Generation Emergency conditions occur Clarify how NRBMTG receives notification of an event that requires NRBMTG to operate
<ul style="list-style-type: none"> PJM Manual 14D, Appendix A: BTMG Business Rules, Business Rule 34 	<p>The amount of megawatts that the resource failed to produce will be the difference between its full netting credit and its megawatt average output over the MEG period.</p>	<ul style="list-style-type: none"> Inconsistency between agreement language and manual language. Manual language appears to use full netting credit as the expected performance level for a NRBMTG; whereas, agreement language uses “full output”. Need to clarify the expected performance level of NRBMTG.

Appendix

“Behind The Meter Generation” shall refer to a generating unit that delivers energy to load without using the Transmission System or any distribution facilities (unless the entity that owns or leases the distribution facilities has consented to such use of the distribution facilities and such consent has been demonstrated to the satisfaction of the Office of the Interconnection); provided, however, that Behind The Meter Generation does not include (i) at any time, any portion of such generating unit’s capacity that is designated as a Generation Capacity Resource, or (ii) in any hour, any portion of the output of such generating unit that is sold to another entity for consumption at another electrical location or into the PJM Interchange Energy Market.

“Non-Retail Behind The Meter Generation” shall mean Behind the Meter Generation that is used by municipal electric systems, electric cooperatives, and electric distribution companies to serve load.

Maximum Generation Emergency shall mean an Emergency declared by the Office of the Interconnection to address either a generation or transmission emergency in which the Office of the Interconnection anticipates requesting one or more Generation Capacity Resources, or Non-Retail Behind The Meter Generation resources to operate at its maximum net or gross electrical power output, subject to the equipment stress limits for such Generation Capacity Resource or Non-Retail Behind The Meter resource in order to manage, alleviate, or end the Emergency.