

## Determination of CBL used for DR CP nonsummer capacity compliance

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## 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



- Tariff refers to Economic CBLs rules instead of use of Economic CBL with economic alternative CBL rules (this was the intention)
- All CP registrations (or potential substitutes) required to perform Relative Root Mean Square Error ("RRMSE") test
  - 60 days of load data (primarily provided to CSP by EDC with customer consent)
  - <20% RRMSE, otherwise alternative CBL process</li>
    - Ultimately PJM determined CBL if no accurate CBL available
  - RRMSE must be done before start of Delivery Year

Significant administrative effort for limited potential value



- Current requirement will require ~7X increase in RRMSE tests and associated load data (EDC & CSP) activity
  - 18,000 location on Load Management registration
  - 2,500 locations on Economic registrations
- Prior CBL analysis indicated 3 day type with SAA performs well for most customers
  - ~75% of all customers with RRMSE <20%</li>
  - RRMSE non bias (just as likely to under forecast as over forecast the load)
  - 10 to 90 percentile (3% to 37% RRMSE) in winter.
- Summer events more prevalent than winter events



- Load Management default CBL for all registrations used for non-summer capacity compliance calculation will be default economic CBL
  - 3 day type with symmetric additive adjustment
- RRMSE test is not required for Load Management registrations
- If customer has both Economic and Load Management registration then use CBL on Economic registration (unless it is MBL type) for capacity compliance calculation
- 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

Who	What	OCKISS	Nonits	O <sub>C</sub> .Zs	lan.16	Feb. 76	Nar.16	70r.76	Max 16
DRS	Problem statement and proposed solution review								
MIC	Problem statement approval, first read proposed solution								
MIC	First read proposed solution								
MIC	Proposed solution endorsement								
MRC	First read								
MRC	Endorsement								
MC	Endorsement								
FERC	File at FERC								
FERC	FERC Decision								

Try to resolve before start of 16/17 DY (CP registrations due).



RRMSE Test values by customer size



## 3 Day type with SAA (Kema results)

season	daytype	size	statistic	count	p10	median	mean	p90
Winter	Weekdays	Up to 500kW	Accuracy (RRMSE)	1,223	3%	14%	23%	38%
Winter	Weekdays	500kW to 2MW	Accuracy (RRMSE)	1,810	3%	10%	18%	37%
Winter	Weekdays	Greater than 2MW	Accuracy (RRMSE)	936	3%	9%	17%	36%
Winter	Weekdays	Size Overall	Accuracy (RRMSE)	3,969	3%	11%	19%	37%

 No significance difference in accuracy between small and large customers