



FERC Notice of Proposed Rulemaking on Storage and DER



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- **Title of Notice of Proposed Rulemaking:** "Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators"
- **Scope:** two parts: storage rules and DER aggregator rules.
- **FERC Docket No.** RM16-23-000
- **Release date:** Nov 17, 2016
- **Reply due date:** Feb 13, 2017

Energy storage able to sell all market/non-market services where capable

FERC Proposal/Request for Comment	¶	Prelim. PJM Position
Wholesale and retail at same unit?	102	Respect retail jurisdiction and proper accounting. Metering can theoretically accomplish this.

¶ 102 “Given the comments in the record indicating that metering and accounting practices can be designed to delineate between wholesale and retail activities, we seek comment on whether such metering and accounting practices would need to be established in the RTO/ISO tariffs to facilitate compliance with this proposal or whether it is possible to determine the end use for energy used to charge an electric storage resource under existing requirements.”

Aggregation of customer-sited and other DER

FERC Proposal/Request for Comment	¶	Prelim. PJM Position
Size limits	135	Follow stakeholders. PJM DR rules here well proven. Assess add'l max size limit for aggregate, similar to CAISO DERP.
Locational aggregation	139-143	Follow stakeholders. PJM DR rules here well proven.
Registration details	145-149	Follow stakeholders. PJM DR rules here well proven.
RTO/EDC coordination for reliability	154-156	<p>Status quo for wholesale DER is: PJM interconnection study coordinates with EDCs to assure reliability. PJM is interested in enhancing PJM-EDC operational coordination. Many ways to accomplish this.</p> <p>Requirements for non-wholesale DER coordinating with RTO (i.e. rooftop solar PV, customer backup gen): TBD</p>

Aggregation of customer-sited and other DER

FERC Proposal/Request for Comment	¶	Prelim. PJM Position
No net metering customers in wholesale DER aggregation	134	Consider different options to avoid duplicate payment, but allow participation. Stakeholder process currently focused on ancillary services to avoid overlap
Accounting for retail offsets vs. wholesale injections	N/A	PJM is considering a comment.
Market agreement	157-158	To be accompanied by PJM study of transmission impacts.

General Comment:

PJM Demand Response participation model works well. New rules and requirements to better incorporate DER aggregation should not infringe on this model which focuses on only load reduction.