

## Behind the Meter Generation Business Rules on Status Changes

### Issue Source

This issue charge is being brought forth by PJM.

### Issue Content

With the increased development of distributed energy resources and increased LSE requests for adjustments to Network Service Peak Load (NSPL) and Obligation Peak Load (OPL) for new BTMG, PJM has identified the need to review and propose updates, as necessary, to the existing BTMG business rules related to a BTMG unit changing status from BTMG (netting against the load) to a resource participating in PJM Markets (and vice versa) to ensure requirements are clear, adequately detailed, and do not conflict with other market business rules or other deadline dates in the BTMG business rules.

While updates to the relevant language in the OATT and Manual 14D, Appendix A are being sought to provide clarity to BTMG business rules on status changes and to eliminate any conflicts with existing market rules or among BTMG business rules, this effort is not meant to change the substance of the existing BTMG rules as established in initial FERC Order on BTMG<sup>1</sup> or Settlement Agreement<sup>2</sup> regarding Non-Retail BTMG.

### Key Work Activities and Scope

#### In scope:

- 1) Provide education on the existing BTMG business rules related to status changes in OATT (Part VI, Attachment O, Appendix 2, Section 2.5) and Manual 14D, Appendix A (business rules #11-23).
- 2) Review and identify areas in existing business rules related to status changes that would benefit from clarification or additional detail or that may be in conflict with existing market rules or other BTMG rules.

This includes, but is not limited to, the following:

- a. Clarify the paths for participation in PJM Markets (as a generator or demand response)
- b. Clarify any relevant limitations or restrictions on market participation
- c. Clarify market participation impact on the unit's ability to net against the load
- d. Clarify requirements associated with changing status and address the conflict with the notification deadline in the OATT to elect a status change from Generation Capacity Resource to BTMG.
- e. Clarify the impact a status change may have on LSE load obligations or any Non-Retail BTMG resource obligations
- f. Clarify which BTMG resources business rule #13 applies to

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<sup>1</sup> Initial PJM BTMG filing is available at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=10079251>. FERC Order on BTMG filing is available at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=10141758>.

<sup>2</sup> Settlement Agreement filing regarding Non-Retail BTMG is available at <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=10863570>. FERC Order on Settlement Agreement is available at <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=10908341>.

- g. Add more specific details on the request process, including any eligibility requirements to be satisfied, for an LSE to request an adjustment to NSPL or OPL in existing rules #14 and #15 (e.g., document Member and PJM roles and responsibilities, the required information to be submitted with a request, and any unit criteria that needs to be satisfied for a NSPL or OPL adjustment to be warranted)
- 3) Propose updates, if necessary, to existing BTMG business rules on status changes in agreements and manuals to clarify the rules and address any potential conflicts with other market rules or other deadline dates in the BTMG rules.

### Out of scope:

1. This effort is not intended to change the substance of the existing BTMG rules as established in initial FERC order on BTMG or the Settlement Agreement regarding Non-Retail BTMG.

### Expected Deliverables

- 1) Revisions to Manual 14D, Appendix A.
- 2) Revisions to OATT, if necessary.
- 3) FERC Filing if revisions to OATT are found to be necessary.

### Decision-Making Method

Tier 1, consensus on a single proposal

### Stakeholder Group Assignment

MIC

### Expected Duration of Work Timeline

It is expected that this effort will last 4 months.

Start Date	Priority Level	Timing	Meeting Frequency
11/7/2020	<input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> Near Term <input type="checkbox"/> Far Term	<input type="checkbox"/> Weekly <input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Quarterly

### Charter

(check one box)

<input type="checkbox"/>	This document will serve as the Charter for a new group created by its approval.
<input checked="" type="checkbox"/>	This work will be handled in an existing group with its own Charter (and applicable amendments).

