



Third-Party DER Ownership

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DER Subcommittee

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1. For DER connecting in PJM under FERC-jurisdiction, PJM Tariff requires:
 - the Interconnection Customer to own and/or control the generation facility and the Customer Interconnection Facilities.
 - Otherwise difficult to contract for the physical terms of interconnection.
2. For DER connecting under local jurisdiction to make wholesale sales in PJM, local rules control.
 - PJM precedent: WMPA is linked to the local IA. The WMPA requires that the party that signs the Interconnection Agreement (“IA”) also signs the WMPA.
 - ISO New England does not have such a requirement for front of meter wholesale DER.

- Under FPA § 201, FERC has jurisdiction over:
 1. Transmission of electric energy in interstate commerce;
 2. Sale of electric energy at wholesale in interstate commerce;
 3. “[A]ll facilities for such transmission or sale of electric energy”
- Under FPA § 201, FERC does not have jurisdiction over:
 1. Facilities used for generation of electric energy;
 2. Facilities used in “local distribution.”
 3. Attachment facilities for state-jurisdictional interconnections of DER.

“Public Utility” → “any person who owns or operates facilities subject to the jurisdiction of the Commission”

- Interconnection to three categories of facilities:
 1. Transmission;
 2. Local Distribution;
 3. Distribution (Dual-Use).

- Two questions:
 1. Is the facility “subject to a public utility’s OATT”?
 2. Does the interconnecting resource intend to engage in wholesale sales?

- “In Order No. 2003, the Commission explained that the rule applies to interconnections to the facilities of a public utility’s Transmission System that, at the time the interconnection is requested, may be used either to transmit electric energy in interstate commerce or to sell electric energy at wholesale in interstate commerce pursuant to a Commission filed OATT. Thus, our assertion of jurisdiction over interconnections rested on two grounds: first, and primarily, our FPA jurisdiction over "transmission" facilities, which may be used for wholesale sales or unbundled retail sales and which are subject to an OATT; and, second, our FPA jurisdiction over wholesale sales which require the use of "local distribution" facilities and thus such facilities become subject to an OATT for purposes of the wholesale sales.” Order No. 2003-C at P 51.

- **Customer Interconnection Facilities:** “Customer Interconnection Facilities” shall mean all facilities and equipment owned and/or controlled, operated and maintained by Interconnection Customer on Interconnection Customer’s side of the Point of Interconnection identified in the appropriate appendices to the Interconnection Service Agreement and to the Interconnection Construction Service Agreement, including any modifications, additions, or upgrades made to such facilities and equipment, that are necessary to physically and electrically interconnect the Customer Facility with the Transmission System.

Generator Seeking Transmission-Connected ISA in PJM



“Customer Interconnection Facilities” shall mean all facilities and equipment owned and/or controlled, operated and maintained by Interconnection Customer on Interconnection Customer’s side of the Point of Interconnection...that are necessary to physically and electrically interconnect the Customer Facility with the Transmission System.

DER Seeking Distribution-Connected ISA in PJM



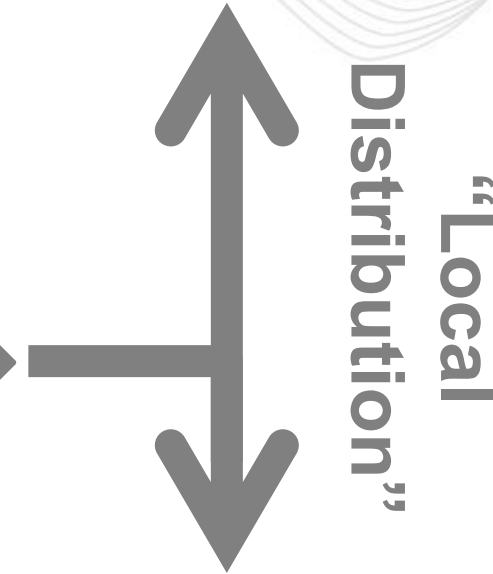
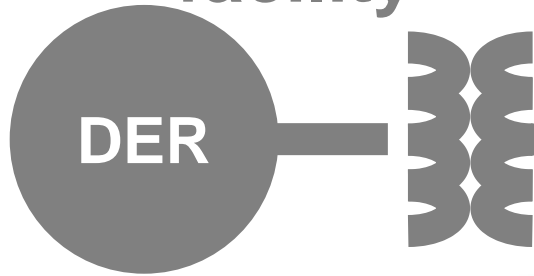
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DER Seeking Wholesale Market Part'n Agreement in PJM

local
generating
facility

local attachment
facilities



PJM
WMPA



ENTITY THAT SIGNS LOCAL
INTERCONNECTION AGREEMENT


“WHEREAS, Wholesale Market Participant and Transmission Owner or its affiliate must enter into a separate two-party interconnection agreement (“Interconnection Agreement”) in order to address issues of physical interconnection and local charges that may be presented by the interconnection of Wholesale Market Participant’s generation to the distribution facility.”



Summary of ISO New England and Interconnection Facilities Ownership

1. DER in Demand Response
 - Similar to PJM, except DER can inject.
 - ISO verification of interconnection approval for DER that inject, but ownership of interconnection facilities/DER is not considered.
2. “Front of meter” DER connecting under state authority
 - Analogous to the PJM Wholesale Market Participation Agreement, generators submit a “Generator Asset Registration Form” signed by the market participant, the utility, and the asset owner.
3. “Front of meter” DER connecting under FERC authority
 - Similar to PJM status quo for ISAs.
4. All market participants with DERs in Demand Response or in front of the meter (under state or FERC authority) must execute a single Market Participant Service Agreement to cover all that participant’s market participation by any number of DERs:
https://www.iso-ne.com/static-assets/documents/regulatory/tariff/attach_e/attachment_e.pdf

- ISO New England: each generator must submit a “[Generator Asset Registration Form](#)” (not a Wholesale Market Participation Agreement), signed by at least:
 - Lead Market Participant of the Asset.
 - Asset Owner.
 - Host Participant (transmission or distribution provider).
 - Assigned Meter Reader.
- Generator also must have a valid local interconnection agreement.
- Owner of interconnection facilities may not necessarily need to sign GARF.



Generator Asset Registration Form (ARF)

Asset ID#: Asset Name:

Request Type - Initial Registration: Desired Implementation Date:

Section 1: Submitting Party Information

Lead Market Participant: Participant ID:

Submitted By: Phone #: E-mail Address:

Section 2: GENERATOR Asset Technical and Modeling Information

Generator Asset Type

Choose if the asset is intermittent or non-intermittent and Modeled or Settlement Only

Intermittent or Non-Intermittent:

Modeled or Settlement Only:

Location of Facility

Street:

City/Town: State:

Revenue Quality Metering (RQM) Type

Metering Submittal Interval Type:

Qualifying Facility or Load behind the meter at the Facility

FERC Docket #: SQF:

(Required for SQF/QF Status)

Facility with load behind the meter that is not station service load

If YES, ISO needs to determine if there is Demand Response at the same location. There cannot be DR and Gen at the same retail delivery point.

Generator Type: FCM Resource ID#:

Load Zone ID (Name): Metering Domain Name (ID#):

LD.Nodal Description:

LD.Node ID & Description (Settlement Only; Consult Host Participant)

UN.Nodal Description:

ISO Completes (EMS Modeled Generator Only)

Section 3: GENERATOR Asset Relationship Information

Asset Lead Market Participant Name: Participant ID: Phone Number: E-Mail:



ISO-NE - “Front of meter” DER connecting under FERC

- Interconnection customer must own and/or control both DER and interconnection facilities.
- If separate ownership of DER and interconnection facilities, bilateral agreements similar to those described by PJM* could be used to combine control into a single party.

*[*https://www.pjm.com/-/media/committees-groups/committees/mrc/20160824-special/20160824-item-03-third-party-arrangements.ashx](https://www.pjm.com/-/media/committees-groups/committees/mrc/20160824-special/20160824-item-03-third-party-arrangements.ashx)*