

Update on Order 745 (Docket ER11-4106-000, DR compensation is energy market) and associated next steps

DRS 1/17/12

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- Significant discussion already complete on implementation details
 - Standing agenda item at each meeting
- Additional stakeholder input for compliance items

Timeline

- Compliance filing due 3/14/12
- New rules effective 4/1/12
- System changes required in early March for transition



- FERC accepted majority of items in filing:
 - Net Benefits Test ("NBT") used to determine compensation based on full LMP
 - DR must clear in DA market or be dispatchable to balance supply and demand
 - DR to set LMP without need for telemetry
 - Cost allocation to LSE plus real time export
 - Enhance measurement and verification to improve accuracy (Customer Baseline or "CBL" and associated process)
 - Implement optional Dispatch Group to aggregate DR registrations for dispatch



- Items that need to be addressed in compliance filing:
 - Reinstate existing compensation (LMP G&T) and cost allocation (to LSE of record for end use customer) rules when LMP < NBT
 - FERC indicated while this is outside the scope PJM may wish to pursue under a section 205 filing.
 - Cost allocation to LSE and RT export where LMP is => NBT instead of PJM filed "> NBT"
 - Provide guidelines governing PJM's unilateral right to set a CBL when PJM and variable load cannot reach an agreement.
 - Clarify requirement for 60 days of load data for residential and small commercial customers that are part of DLC program.



CBL guidelines when PJM and CSP cannot reach an agreement

Clarify process developed at DRS

- The CBL Certification process (prior to registration submission) will identify variable load customers. All customers must use a CBL with an error (RRMSE) no greater than 20% and better than default CBL unless otherwise approved by PJM.
- Clarify minimum load data requirements (vintage and quantity) for valid RRMSE
- CSP can determine alternative CBL if needs to meet 20% accuracy threshold
- Determination of CBL will not be arbitrary but based on accuracy metric (RRMSE)



- Non-hourly pilot provisions will remain to participate under economics without interval meters
 - Load data for all customers will not be required under this provision since interval metering does not exist
- Interval meter customers will need to submit interval meter data for CBL certification process