Efficiency of DR Registration Process

DRS

7/12/2013

Education of current process	identify interests, refine issues	Develop solutions aligned to issues/interests	Pros/Cons of solutions	Proposals to stakeholder process for endorsement
Jan	Feb/Mar	Mar/Apr	Apr/May	May-Aug
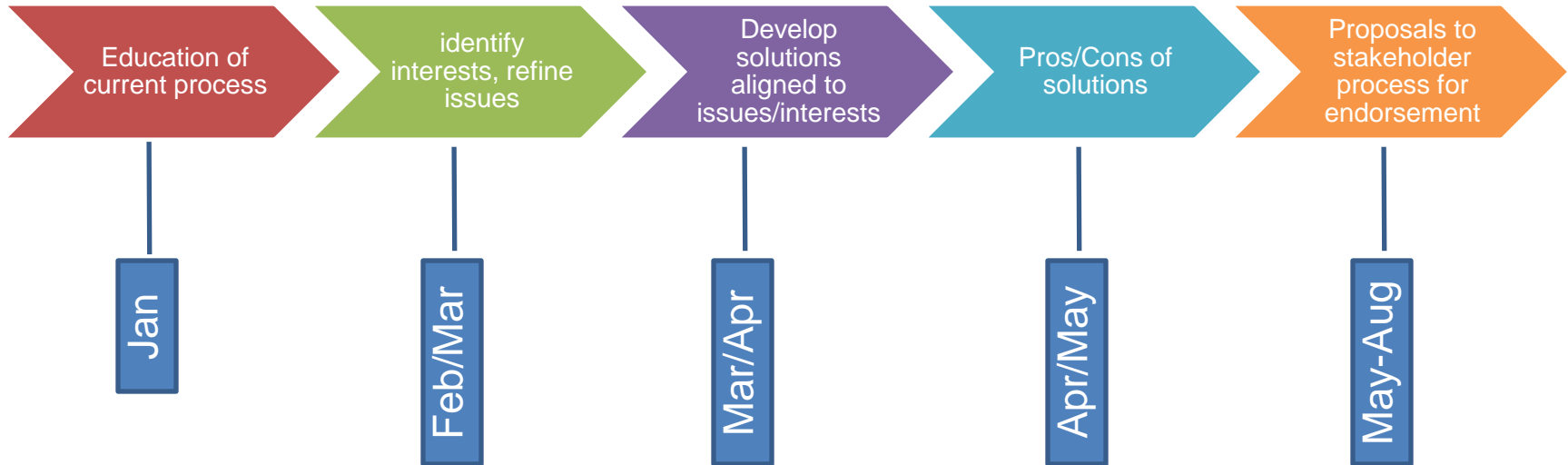
1. Difficult to identify correct LSE by CSP
   – Results in duplicate work for EDC and LSE
   – Confusion on which LSE subaccount to use
2. Keep status quo or reduce work for EDC (validation)
3. Takes significant amount of time to set up LSE in eLRS so CSP can use on registration
4. Inaccurate negative dec for LSE
5. LSE confusion regarding responsibilities in registration review process
6. Confusion over "contractual obligation" provision in tariff
7. Fragments aggregation by LSE for small customers

Emergency Registrations	Economic Registrations
1. Remove LSE from emergency registration review process	2A. Remove LSE from economic registration review process
	2B. Simplify LSE Role and remove approval by LSE
	2C. Keep LSE role only for Day-Ahead registration reviews process

Based on prior poll Proposal 1 and 2A will go to MIC for endorsement

#	Design Components[1]	Sub-Design Component	Priority (high/med/low)	Status Quo	A – Remove LSE Role from Emergency Registraitons	B	C
					Solution Options		
1	LSE Role for **Emergency** Registration Review	RERRA	High	LSE and EDC may review RERRA policy pertaining to participation in DR	Remove LSE from RERRA review process. EDCs will continue to review RERRA for emergency registrations		
2	LSE Role for **Emergency** Registration Review	Contractual Obligation	High	LSE reviews for Contractual Obligations	Remove LSE review of emergency registrations for contractual obligations		

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PROPOSAL MATRIX 1– Change to LSE Role for Emergency Registrations

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PROPOSAL MATRIX 2– Change to LSE Role for Economic Registrations

				Solution Options		
#	Design Components[1]	Priority (high/med /low)	Status Quo	**A – Eliminate LSE Role** from Economic Review Process	**B – Simplify LSE Role** in Economic Review Process	**C – LSE Role only in DA** Registration review process
3	RERRA	Med	LSE and EDC may review RERRA policy pertaining to participation in DR	Remove LSE from RERRA review process. EDCs will continue to review RERRA for economic registrations	Remove LSE from RERRA review process. EDCs will continue to review RERRA for economic registrations	Remove LSE from RERRA review process. EDCs will continue to review RERRA for economic registrations
4	Contractual Obligation	Med	LSE reviews for Contractual Obligations	Remove LSE review of economic registrations for contractual obligations	Remove LSE review of economic registrations for contractual obligations	Remove LSE review of economic registrations for contractual obligations
5	Negative Dec for DA Cleared Bids	Med	Negative decs are placed against LSEs for DA Cleared bids	PJM does not place negative decs for LSEs.	PJM places Negative decs for LSEs for DA Cleared bids	PJM places Negative decs for LSEs for DA Cleared bids
6	LSE Review Task		LSE approves registrations	LSE does not approve registrations. LSE will not be notified of registrations.	LSE will not approve registrations but can run report to see registrations where they have been selected as LSE	LSE only approves registrations eligible for Day Ahead market. LSE does not receive notification of other registrations.
7	Registration Aggregation		Registrations are aggregated by LSE (as well as EDC Zone, Pricing Point)	Registration will not be aggregated by LSE	Registrations will continue to be aggregated by LSE	Only DA registrations will be aggregated by LSE
8	EDC and LSE approvals dependent on each other		Registration denial forces re-approval by both EDC and LSE	LSE does not have approval role therefore no re-work for EDC	LSE does not have approval role therefore no re-work fo EDC	EDC and LSE denial (if any) does not cause re-work for each other

- # Emergency Registration – Remove LSE Role

Pros	Cons
Solves the following Issues/Interests: 1. Difficult to identify correct LSE by CSP 2. Keep status quo or reduce work for EDC 3. Takes significant amount of time to set up LSE in eLRS so CSP can use on registration 5. LSE confusion regarding responsibilities in registration review process 6. Confusion over "contractual obligation" provision in tariff 7. Fragments aggregation by LSE for small customers	•Will not allow duplicative review by LSE for RERRA • LSE would need to work with their customer to manage their contract and any impact from DR activity. •Potential workaround for EDC that has LSE do RERRA reviews.

• Economic Registration – Remove LSE Role

Pros	Cons

• Eliminate incorrect Neg Dec against incorrect LSE
• Eliminate incorrect Neg Dec against correct LSE
• Simplifies registration process and solves the following Issues/Interests:
  1. Difficult to identify correct LSE by CSP
  2. Keep status quo or reduce work for EDC
  3. Takes significant amount of time to set up LSE in eLRS so CSP can use on registration
  4. Inaccurate neg dec for LSE
    - Avoid neg dec for incorrect LSE
    - Avoid incorrect neg dec for correct LSE
  5. LSE confusion regarding responsibilities in registration review process
  6. Confusion over "contractual obligation" provision in tariff
  7. Fragments aggregation by LSE for small customers
	• LSE will need to forecast DR activity as part of load forecast to manage DA position
	• Will not allow duplicative review by LSE for RERRA

• Economic Registration – Simplify LSE Role

Pros	Cons

•Simplifies registration process by:
  o Eliminates approval by LSE so EDC approval has no re-work from an LSE denial
  oLSE can see list of associated registrations at any time
  oCSP can easily change LSE without terminating registration
•Solves the following Issues/Interests:
 	
2. Keep status quo or reduce work for EDC
 	
5. LSE confusion regarding responsibilities in registration review process
 	
6. Confusion over "contractual obligation" provision in tariff
	•Registrations must still be aggregated by LSE (and EDC, Zone and Pricing Point)
	•Will not allow duplicative review by LSE for RERRA
	•Does not solve the following Issues/Interests:
	
	1. Difficult to identify correct LSE by CSP
	
	3. Takes significant amount of time to set up LSE in eLRS so CSP can use on registration
	4. Inaccurate neg dec for LSE
	  - Avoid neg dec for incorrect LSE
	  - Avoid incorrect neg dec for correct LSE
	7. Fragments aggregation by LSE for small customers

- # Economic Registrations – Keep LSE role only for Day-Ahead registration reviews process

Pros	Cons
•Simplifies registration process and solves the following Issues/Interests for all registrations <u>except</u> Day Ahead Market participating registrations: 1. Difficult to identify correct LSE by CSP 2. Keep status quo or reduce work for EDC 3. Takes significant amount of time to set up LSE in eLRS so CSP can use on registration 5. LSE confusion regarding responsibilities in registration review process 6. Confusion over "contractual obligation" provision in tariff 7. Fragments aggregation by LSE for small customers	•Will not allow duplicative review by LSE for RERRA •DA registrations must still be aggregated by LSE •LSE may have inaccurate neg dec •Incorrect LSE may have neg dec •Provide disincentive to participate in DA market •Does not solve the following Issues/Interests for DA registrations: 1. Difficult to identify correct LSE by CSP 3. Takes significant amount of time to set up LSE in eLRS so CSP can use on registration 4. Inaccurate neg dec for LSE - Avoid neg dec for incorrect LSE - Avoid incorrect neg dec for correct LSE 7. Fragments aggregation by LSE for small customers