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# Proposed Updates to Behind the Meter Generation Business Rules on Status Changes

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Propose updates to existing Behind the Meter Generation (BTMG) business rules on status changes

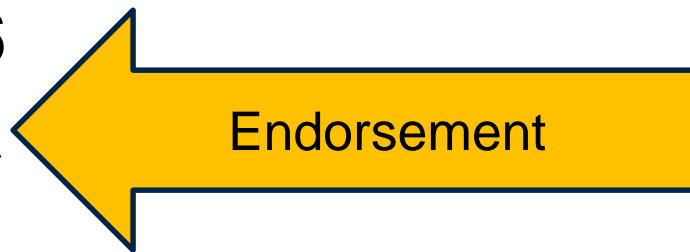
- Changes from BTMG status to PJM Market Resource status (and vice versa)
- Address conflicts with RPM Must Offer Requirement and Removal from Generation Capacity Resource status business rules
- Clarify and document the processes related to status changes

## OATT

- Attachment O, Appendix A, Section 2.5
- Part IV, Subpart A, Section 36.1A.6

## PJM Manuals

- M14G, Section 1.6
- M14D, Appendix A



- Updates to BTMG business rules on status changes that address the following areas
  - Designating Capability as Generation Capacity Resource and/or Energy Resource
  - Participation in PJM Load Response
  - Load Impacts
  - Performance Obligation Impacts
  - Miscellaneous updates

# Designate Capability as Generation Capacity Resource and/or Energy Resource

- Treatment of multiple units located behind the meter – designate capability on whole or partial unit basis (#12)
- New Services Request requirement (#13)
- Process to request change from BTMG status to Generation Capacity Resource and/or Energy Resource status and vice versa (#14, 15, 17, 18, 19, & 20)
- MW of capability designated as capacity or energy and restrictions on netting against load (#16)
- Timing and duration of a status change (#29, 30, & 31)
- Treatment of CIRs (#33)

<p># - Existing rule clarified</p> <p># - New rule added</p>
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# Participation in PJM Load Response

- Capability participating as PJM Load Response (Pre-Emergency/Emergency and Economic Load Response) (#34)
- Process to indicate BTMG unit participating in PJM Load Response (#35)
- Restriction on participation for portion of BTMG unit that injects (#36)
- MW of output may not be used for multiple purposes simultaneously (#37)
- Ability to participate in Pre-Emergency/Emergency Load Response impacted if operate BTMG to reduce Peak Load Contribution (PLC) (#38)

# - Existing rule clarified  
 # - New rule added

- Operating BTMG nets against actual gross load at end-use customer site or at wholesale area level (#40)
- Network Service Peak Load (NSPL)/Obligation Peak Load (OPL) adjustment request due to change from Generation Capacity Resource status to Non-Retail BTMG status or a new Non-Retail BTMG unit (#22)
- Process and criteria for an NSPL adjustment request (#23)
- Adjustment to zonal NSPL for approved NSPL adjustments in zone (#24)
- Process and criteria for an OPL adjustment request (#25)
- Adjustment to zonal weather normalized peak and zonal metered peaks for 5CP hours for approved OPL adjustments in zone (#26)
- EDC access to Non-Retail BTMG unit data in their zone in Capacity Exchange system to facilitate processing of NSPL/OPL adjustments for new units (#27)

<p># - Existing rule clarified</p> <p># - New rule added</p>
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- Approved NSPL/OPL adjustment request impacts expected performance of Non-Retail BTMG unit (#28)
- Reduction in requested NSPL/OPL adjustment if Non-Retail BTMG unit(s) in wholesale area failed to perform (#32)
- Non-Retail BTMG performance requirement for MWs operating in Non-Retail BTMG status during emergency events (#69)
- Impact of netting reduction penalty amount to NSPL/OPL for Non-Retail BTMG unit(s) failure to perform remains in effect regardless if Non-Retail BTMG unit changes to Generation Capacity Resource status (#82)

# - Existing rule clarified  
 # - New rule added



- Capacity or output that may not be included as BTMG (#6)
- Ineligibility for reactive payments for portion of unit that changes to BTMG status and FERC filing requirement (#7)
- BTMG may be included in Public Distribution Microgrid (#11)

### Administrative updates

- Add section headings to improve organization
- Correct business rule numbers referenced in rule #54

# - Existing rule clarified  
# - New rule added

# Stakeholder Process Timeline

- **8/10 PC** – M14G first read, informational update (OATT changes)
- **8/12 OC**- M14D first read
- **8/31 PC** – M14G endorsement

- **10/20 MRC** – OATT, M14G, & M14D endorsement



- **7/14 MIC** – Information Update (OATT, M14G, & M14D changes)
- **7/29 TOA-AC** – Informational update (OATT changes)

- **9/10 OC** – M14D endorsement
- **9/29 MRC** – OATT, M14G, & M14D first read

- **11/17 MC** – OATT endorsement

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## Behind the Meter Generation Business Rules on Status Changes



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# Appendix

- Delete entirety of Section 2.5 in Attachment O, Appendix A
  - Includes obsolete provision to change status from Generation Capacity Resource to BTMG status or vice versa (up to Capacity Interconnection Rights awarded) with notice just prior to Delivery Year
  - Provision cannot be exercised with RPM Must Offer Requirement and Removal of Generation Capacity Resource Status business rules
- Update Section 36A.1A.6 in Part IV, Subpart A to remove reference to Section 2.5

- Ensure consistency with Behind the Meter Generation definition in the OATT (Section 1.6)
- Clarify information required in interconnection request to designate capability as Generation Capacity Resource and/or Energy Resource (Section 1.6.1)
  - List information required in New Services Request for a BTMG unit
  - Define behind the meter load
  - Clarify determination of maximum host/process loads
  - Clarify determination of Maximum Facility Output (MFO)
  - Refer to M21 for determination of station service and auxiliary loads and Capacity Interconnection Rights (CIRs)
  - Clarify CIRs requested shall not be greater than gross generator output less station service and auxiliary loads less the maximum host/process loads that facility is expected to serve