

## Information & Data Requirements

**202.** The Commission found that aggregate settlement data for a distributed energy resource aggregation, as well as performance data for individual distributed energy resources in a distributed energy resource aggregation are necessary for the participation of any type of resource in RTO/ISO markets and to enable the RTO/ISOs to perform necessary audit functions.

Therefore, the Commission required each RTO/ISO to revise its tariff to require each distributed energy resource aggregator to maintain and submit aggregate settlement data for the distributed energy resource aggregation, so that the RTO/ISO can regularly settle with the distributed energy resource aggregator for its market participation. The Commission also required each RTO/ISO to revise its tariff to require each distributed energy resource aggregator to provide, upon request from the RTO/ISO, performance data for individual resources in a distributed energy resource aggregation for auditing purposes.

**207.** Regarding information sharing between PJM and affected distribution utilities, PJM explains that it has developed an operational framework that facilitates communication between parties (PJM, DER Aggregator, and electric distribution company) for day-ahead, real-time, and emergency (override) scenarios.

**208.** PJM explains that the proposed tariff revisions mandate that a DER Aggregator report to PJM any proposed update to the inventory of the individual Component DER within the DER Aggregation Resource identified in the DER Aggregator's registration, to reflect any proposed addition or subtraction of a Component DER, and any applicable information or data associated with the Component DER.

**222.** PJM's proposed tariff language requiring the DER Aggregator to provide "associated physical and transmission system electrical location information of the applicable Component DER" is also unclear. While we believe that PJM has generally explained the need for this electrical location information, in that it enables PJM to map the Component DER participating in a DER Aggregation Resource to an individual node, PJM has not identified the specific information that the DER Aggregator is required to provide. Therefore, we find that PJM must identify what specific information it requires related to the physical and transmission system electrical location of the Component DER and explain why the specific information is necessary, consistent with Order No. 2222.

**223** Third, PJM has not identified or explained the specific information that the DER Aggregator is required to obtain and verify in coordination with the electric distribution company regarding "compliance with applicable PJM and electric distribution company metering and telemetry requirements." Therefore, we find that PJM must clearly identify and explain this requirement, consistent with Order No. 2222. We note that electric distribution companies are not responsible for evaluating PJM's metering and telemetry requirements for DER Aggregation

Resources. We also note that electric distribution companies' metering and telemetry requirements may not all be the same.

**224.** PJM to file, within 60 days a further compliance filing identifying and explaining the proposed information requirements for the individual distributed energy resources with respect to: (1) evidence of approval to interconnect, and (2) associated physical and transmission system electrical location information of the applicable Component DER, including compliance with applicable PJM and electric distribution company metering and telemetry requirements

**245.** PJM states that its proposed DER Aggregator Participation Model does not explicitly rely on meter data obtained through compliance with distribution utility or local regulatory authority requirements, but similar to the current practice for distribution connected resources, PJM states that DER Aggregators have the option to rely on existing distribution utility infrastructure whereby they would comply with applicable local rules. PJM explains that it allows for flexibility to minimize the burden on both resources and distribution utilities.

#### **EDC Position and Response:**

- The EDCs and LSEs need Component DER data to perform settlements, not aggregated data.
- DR settlement data is obtained and provided via settlements well after the DR event. Current DR settlements generally do not pose an issue for the EDCs/LSEs as the DR settlements are purely monetary settlements, however if DER aggregations will include injectable resources, the EDCs believe we must accommodate for the wholesale kWh injections in their settlement process which is going to be more than a monetary settlement where retail kWh need to be separated or accounted for separately from wholesale kWh. The retail billing processes and wholesale settlement processes will become more complicated and will require modifications to current retail billing, wholesale settlements and data collection processes.
- It is imperative for PJM and stakeholders to parse through the specifics of more complex use cases to determine additional detail needed in the Tariff and/or PJM manuals. Although PJM has considered some limited use cases in the stakeholder process, it has not considered the interplay between the settlement and metering requirements associated with complicated DER Aggregations that could employ many combinations of retail programs, wholesale market programs, retail load reductions, and combinations of injections with load reductions. A deliberate or phased approach to use case reviews is needed to determine metering requirements, participation rules etc. would benefit all parties.

## Indicated Utilities' Comments & Position – Working Draft for Discussion Purposes with PJM

- EDCs and RERRAs have consistently indicated support for using the EDC metering where possible and available for PJM settlements. The EDCs will need to verify the Metering and Telemetry requirements for PJM market participation are accommodated in their retail interconnection agreements/processes.
- DER Aggregators have indicated Component DER data availability by the next day, even when using EDC data is problematic at best. Timely and accurate data will be needed.
- Any updates to Component DERs part of an approved DER Aggregation must go through a new registration process to allow the EDC and LSEs to ensure no double counting issues, validate the new Component DER is eligible and capable to provide wholesale services and to allow the EDC to review any impacts to the DER Aggregation study.
- Upon removing references to applicable EDC metering & telemetry in PJM's tariff language, maintain a comment that proper verification by the EDC for metering and telemetry requirements for market participation must be performed regardless of whether there is a current retail interconnection agreement as those agreements likely didn't contemplate wholesale market participation.