

Options Feasibility

Summer-Only Demand Response
Senior Task Force

July 25, 2018

- Package B
 - Same as PJM. Performance can be met by a stated reduction once the triggers are hit, or a commitment to not increase load any higher, once the trigger is hit.
 - This does not appear to be the same as PJM's language. What is meant by "commitment to not increase load any higher"?

- Package B
 - Two types of Triggers - (1) when the DA load forecast, as adjusted to add-back peak shaving load, reaches a design % of the 50/50 summer peak forecast for existing programs, or (2) a forecasted DA THI threshold is forecasted.

- Package B – Trigger (1)
 - when the DA load forecast, as adjusted to add-back peak shaving load, reaches a design % of the 50/50 summer peak forecast for existing programs
 - PJM does not have DA load forecasts back to 1998 and don't have summer peak forecasts back to 1998. Would need to additionally consider day ahead forecast error, and be particularly cautious of the situation where load comes in higher than the day ahead (i.e. load is at peak type conditions but peak shaving doesn't run because the DA forecast was low).

- Package B – Trigger (2)
 - a forecasted DA THI threshold is forecasted
 - Who bears responsibility for the DA THI forecast? Like Trigger (1), any forecast adjustment would need to consider DA forecast error

- Package C (MMU)
 - The lower of a THI threshold or load threshold associated with the individual program.
 - Likely technically feasible, but need further detail on how the load threshold is constructed.

- **Package B - Credits are paid to the entity designated by the program administrator [EDCs, LSE's or CSPs]. Payments can be made to EDCs, LSEs, or CSPs or as determined and implemented by the state**

- Package B - Comments/feasibility concerns
 - Savings are not automatically determined in auction clearing and settlement. Does this imply clearing the auction without peak shaving programs (normal load forecast) and with peak shaving programs (reduced load forecast) and calculating the savings?
 - Any allocation based on PLCs must be managed by EDC. PJM's authority does not allow us to determine PLCs. PJM simply allocates RTO obligation based on official zonal load forecasts and settles load charges based on PLCs submitted by EDCs.

- Package B
 - Same as CP DR reporting rules
 - Manual 18, Section 4.3.1: "In order to offer a Demand Resource in an RPM Auction or commit a Demand Resource in an FRR Capacity Plan, a demand resource provider must submit no later than 15 business days prior to the RPM Auction or prior to the deadline for submitting the FRR Capacity Plan a Demand Resource Sell Offer Plan (DR Sell Offer Plan)"
 - The proposed date is after Feb 1, the date we post planning parameters. So the reduced load forecast cannot be in the planning parameters.