

# **United States of America Federal Energy Regulatory Commission**

## **Demand Response Programs Docket No. AD02-23-000**

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# PJMICC

- **37 of largest commercial and industrial customers in PJM Region**
- **Represent over 8 billion KWH per year consumption**
- **Utilization of preferred curtailment service provider program facilitating participation in PJM Load Response Programs**
- **126 MW registered in PJM Economic Program**
- **352 MW registered in PJM Emergency Program**
- **Active in stakeholder process developing LRPs**

# Positive Influences of PJM LRPs

- **Quick, easy registration process**
- **Attracted participation from non-active load management (“ALM”) customers**
- **Focused customers on Day-Ahead (“DA”) and Real-Time (“RT”) market prices**
- **Encouraged customer plant shut-downs and maintenance scheduling to coincide with anticipated high load periods**
- **eData systems permitted easy customer tracking of market prices**
- **Cooperation and responsiveness of PJM staff to customer inquiries**

# Recommended Enhancements

- **Eliminate exclusion of LMP-based contract customers from Economic LRP**
- **Incentivize additional participation by eliminating generation and transmission (“G&T”) offset where LMP is below \$75/MWH in Economic LRP until sunset date**
- **Address retail tariffs preventing customer receipt of energy payments during ALM events; customer needs payment for capacity and energy value of load reduction**

# Recommended Enhancements

- **Expand special membership qualification from Emergency LRP to Economic LRP as well to avoid unnecessary curtailment service provider (“CSP”) interface**
- **Specification of steps during load reduction periods assuring maximization of voluntary prior to mandatory load reduction mechanisms irrespective of consideration of \$500/MWH minimum payment in Emergency LRP**
- **Permit simultaneous participation in Emergency and Economic LRPs**

# Recommended Enhancements

- **Improve market user interface for customer to bid in Real-Time market**
- **Simplify customer baseline formula to enhance predictability for participation in Day-Ahead financially binding market**
- **Accelerate customer payments for program participation**
- **Enforce ten-day window for electric distribution company (“EDC”) response to load data submissions**
- **Eliminate sunset provisions of December 31, 2004**

# Questions