

# FERC Order EL13-74 (BTMG in DADRP) Compliance Update

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# Topics

- ◆ **Order EL13-74**
- ◆ **Eligibility of Local Generators**
- ◆ **Registration of Demand Reduction Providers**
- ◆ **Enrollment of Demand Side Resources**
- ◆ **Metering**
- ◆ **Data Reporting**
- ◆ **Measurement & Verification**
- ◆ **Next Steps**

## **NYISO's Order EL13-74 Filings to Date**

- ◆ **On June 17, 2013, Demand Response Supporters filed a joint complaint against the NYISO requesting demand response facilitated by behind-the-meter generation be eligible to participate in DADRP**
- ◆ **On November 22, 2013, the Commission granted this complaint in part and directed the NYISO “to develop and file appropriate tariff language for integrating into DADRP demand response facilitated by behind-the-meter generation (Paragraph 31)**

# **FERC's Order in EL13-74**

- ◆ **The Commission required the NYISO to “undertake a stakeholder process and present the Commission within 180 days of this order, tariff provisions that will permit behind-the-meter generation to participate in DADRP.” (Paragraph 38)**
- ◆ ***On February 24, 2014, the Commission denied the NYISO’s request for additional time to develop the tariff provisions***
- ◆ ***The NYISO’s compliance filing is due on May 21, 2014***

# Overview of DADRP

- ◆ **An economic demand response program designed to permit a Demand Reduction Provider (DRP) to offer a Demand Reduction in the Day-Ahead Energy Market**
- ◆ **Scheduled Day-Ahead if economic and paid Day-Ahead price for scheduled reduction**
  - *No real-time price or dispatch*
- ◆ **If scheduled, paid the greater of energy marginal price or offer price, with daily curtailment initiation costs guarantee and Demand Reduction Incentive Payment.**
- ◆ **Minimum of 1 MW energy offer with \$75 bid floor**
- ◆ **DRP is the NYISO interface**
- ◆ **Since 2003, only Load Curtailment has been permitted**

# Compliance Obligations

- ◆ **To enable Local Generators to participate in the DADRP, the NYISO is developing revisions to its tariffs and DADRP procedures regarding:**
  - *Eligibility, Enrollment and Registration*
  - *Settlement/Measurement & Verification*
  - *Data Reporting Requirements*

# Resource Eligibility – DRIS Response Types

- ◆ **Currently, only demand response that is achieved solely through load curtailment is eligible to participate in the DADRP**
  - *Such resources are labeled in DRIS as Resource Type “C”*
  - *Enrollment information about load is required, and the Demand Response is measured at the PSC-approved net load meter*
- ◆ **The NYISO proposes to permit participation in the DADRP of demand response that is achieved through the combination of increased generation by a Local Generator up to the level of its load and load curtailment**
  - *Such resources are labeled in DRIS as Resource Type “B”*
  - *Enrollment information about both the load and Local Generator will be required, and the Demand Response will be measured at both the PSC-approved net load meter and the PSC-approved Local Generator meter*
- ◆ **The NYISO does not propose to permit participation by a Local Generator enrolled solely on the basis of the output of the Local Generator**
  - *Such resources are labeled in DRIS as Resource Type “G”*
  - *Demand response for these resources is measured through the Local Generator meter, which is the only subscribed meter for this type of resource*

# Resource Eligibility – Local Generator Permit - 1

- ◆ **A Local Generator will be required to possess one of the following valid NYSDEC Permits to participate in DADRP:**
  - *NYSDEC Air Registration Permit;*
  - *NYSDEC State Facility Permit; or*
  - *NYSDEC Title V Federal Permit*
- ◆ **Local Generators that are exempt under Section 201.3 of the NYSDEC regulations will not be eligible to participate in DADRP**

# Resource Eligibility – Local Generator Permit - 2

- ◆ **NYISO will require that the DRP provide a copy of the permit to the NYISO when enrolling any Demand Side Resource with a Local Generator in the DADRP**
  - *Only Local Generators allowed to operate under non-emergency conditions will be eligible to participate in DADRP*

# Resource Eligibility – Local Generator Permit - 3

- ◆ **Post-Enrollment Air Permit Status**
  - *Continuing participation in the DADRP, will be deemed as a continuing representation by the DRP that each time the Local Generator is run to support a Demand Reduction for DADRP, it complies with all applicable permits, including any emissions, run-time limit, or other constraint on plant operations that may be imposed by such permits*

# Registration of the DADRP Provider

- ◆ Registration packet (new)
- ◆ Parts of packet
  - *DADRP Provider Applicant Information*
    - Contact information
    - Third Party Information
  - *Communication Plan*
  - *Data Management Plan*

# Registration of DADRP Resources

- ◆ **Registration of the DADRP Resource will be conducted through the DADRP Resource Registration Packet**
  - *Includes a worksheet for providing detail on each Demand Side Resource that is part of the DADRP Resource*
  - *Reporting requirements for a Local Generator will be included in the Demand Side Resource worksheet*

# Settlements/M&V

- ◆ **Settlement Data Reporting**
  - *DADRP falls under the 55-day supplier requirements, not the 75-day DR event reporting requirements*
  - *Settlements Data Exchange (SDX) will be the reporting mechanism*

# Settlements/M&V (cont.)

- ◆ **Measurement & Verification**
  - *Base-load generation is not permitted to be paid for this activity, nor is base-load generation permitted to be used in the development of the CBL. (Refer to language in ICAP Manual, Section 4.12.4)*
  - *Baseline*
    - **NYISO will be coming back in May to provide details on the CBL methodology.**

# Additional Data Reporting Requirements – Hourly Interval Data

- ◆ **Following data is required from both Net Load Meter and Local Generator Meter**
  - *Hourly response for the actual hourly Demand Reduction provided by the DADRP resource for the scheduled period*
    - In the format required for reporting to the NYISO’s Settlement Data Exchange application
  - *Hourly interval data for all Demand Side Resources that are enrolled as the DADRP resource (all hours of each day that the DADRP resource is scheduled)*
  - *All interval load data for all Demand Side Resources that are enrolled as the DADRP resource (all hours of each day that the DADRP resource is scheduled) plus the previous 30 days (whether or not the resource was scheduled)*

# Data Reporting Requirements-Meter

- ◆ For each meter (Net Load and Local Generator), information for each Demand Side Resource enrolled:
  - *Required to be a PSC-approved revenue grade meter*
  - *As-left meter test criteria, as prescribed in the New York Department of Public Service 16 NYCRR Part 92 Operating Manual*
  - *Documentation to validate installation of meter equipment*
  - *Interval Metering installation date*
  - *Interval Metering installation individual and company*
    - Name, license number, and company information
  - *Meter Equipment Type*
    - Make and Model of Interval Meter
    - Interval Metering accuracy
    - For CTs or PTs: Type Designation and Ratio

# Data Reporting Requirements – DSRs

## ◆ Demand Side Resource Documentation

- *Service address of each Demand Side Resource*
- *Load Serving Entity*
  - Must be same LSE for all Demand Side Resources in an aggregation
- *Transmission Owner*
- *Meter Authority*
- *Individual Demand Side Resource Maximum Winter and Summer Reduction MW*

# Data Reporting Requirements - Local Generators - 1

## ◆ Local Generator Information

### ■ *Local Generator Type*

- Generator types are: Internal Combustion Engine, Combustion Turbines, Steam Engines and Cogeneration units (this also includes Central Heat and Power units)
- Others – must specify

### ■ *Local Generator Fuel Type*

- The primary fuel type used for each Local Generator :
  - Coal, Diesel, Natural Gas, Oil, Gasoline, Kerosene, Propane, Wood, Landfill Gases and Waste products
  - Other – must specify

## Data Reporting Requirements - Local Generators - 2

### ◆ Local Generator Information (cont.)

- *Generator Vintage - The year (or reasonable estimate if not known) the generator was built (included on nameplate)*
- *Generator Retrofit Year - If the generator was retrofitted for emission control equipment please include the year of the retrofit*
- *Nameplate Capacity - MW rated capacity for the generator*

## Existing Obligations of Demand Reduction Providers - 1

- ◆ **Demand Reduction Providers or their metering authority shall comply with the Settlement reporting requirements of:**
  - ***Section 7.4.1 of the Market Services Tariff for Suppliers***
  - ***Meter Data Management Protocols***
    - **Located on the NYISO Financial Services webpage, under Billing and Settlement**

## Existing Obligations of Demand Reduction Providers - 2

- ◆ Demand Reduction Providers shall comply with the requirements of Attachments H and O (ISO MST), including but not limited to:
  - *Production Costs*
  - *Opportunity Costs*
  - *Operational Logs (for outage verification)*
  - *Bidding Agreements (for Financially Responsible Party or Scheduling Service Provider Agreements)*
  - *Other Cost and Risk Data Supporting Reference Levels or Going-Forward Costs and any other information necessary to establish a reference price or offer floor for mitigation purposes*
  - *Ownership and Control*
  - *Any additional data, defined in Attachment O to the ISO MST, which may be requested by the NYISO as deemed necessary to verify the Demand Side Resource's participation in NYISO's energy market*

# Additional Data That May Be Requested by NYISO

- ◆ **Additional Data that may be requested by the NYISO as deemed necessary to verify participation as a Demand Side Resource in NYISO’s energy market or comply with Section 3.4 of the Market Services Tariff**
- ◆ **The following additional data may be requested related to the Net Load Meter and/or Local Generator meter:**
  - *Historical Load Documentation*
  - *Load data history for Pre and Post Validation, Edit and Estimation (VEE) load data*
  - *Historical Load Data (provide a minimum of up to three months hourly interval metering data, as requested, when registering new DADRP resources)*
  - *New and Existing Metering Documentation*
  - *Time Check – time clock within +/- two minutes of true time (NIST)*
  - *Sum Check – the sum of the intervals when compared to the totalized load over the same period must agree within +/- 2%*
  - *High/Low Check – minimum and maximum expected values for the facility*
  - *Zero Value Check – identification and verification of hours with “0” values.*

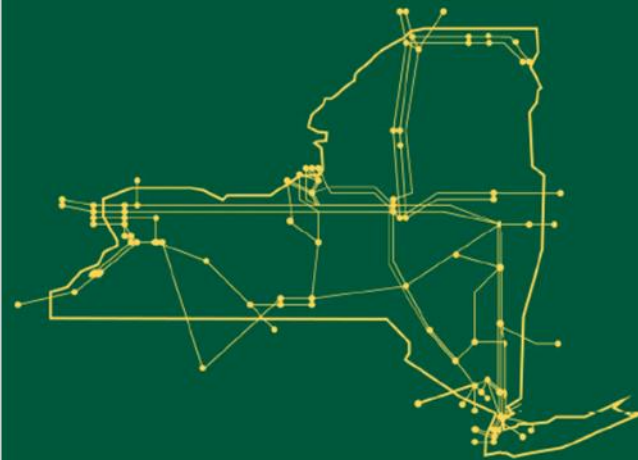
# Next Steps

- ◆ *Return to MIWG in May prior to the compliance filing to review additional compliance filing material*
- ◆ *Compliance filing with FERC on May 21, 2014*

# Questions



The New York Independent System Operator (NYISO) is a not-for-profit corporation responsible for operating the state's bulk electricity grid, administering New York's competitive wholesale electricity markets, conducting comprehensive long-term planning for the state's electric power system, and advancing the technological infrastructure of the electric system serving the Empire State.



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