Summer 2025 Demand Response Performance

Market Monitoring Unit Advisory Committee December 5, 2025 **IMM**



June 23: Mid-Atlantic and Dominion

| Deploy Time (EPT) | Release Time (EPT) | Resource Type | Lead Time | Zones |
|----------------------|-----------------------|---------------|------------|--|
| 1500 | 2200 | Pre-emergency | 120 minute | AECO, BGE, DOM, DPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG |
| 1500 | 2200 | Pre-emergency | 60 minute | AECO, BGE, DOM, DPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG |

June 24: RTO

| Deploy Time | Release Time | | | |
|--------------------|--------------|---------------|------------|--|
| (EPT) | (EPT) | Resource Type | Lead Time | Zones |
| 1500 | 2200 | Pre-emergency | 120 minute | BGE, DOM, PECO, PEPCO |
| 1530 | 2200 | Pre-emergency | 120 minute | AECO, DPL, JCPL, METED, PENELEC, PPL, PSEG |
| 1600 | 2200 | Pre-emergency | 120 minute | AEP, APS, DAY, DUQ |
| 1630 | 2200 | Pre-emergency | 120 minute | ATSI, COMED, DEOK, EKPC |
| 1500 | 2200 | Pre-emergency | 60 minute | BEG, DOM, PECO, PEPCO |
| 1530 | 2200 | Pre-emergency | 60 minute | AECO, DPL, JCPL, METED, PENELEC, PPL, PSEG |
| 1600 | 2200 | Pre-emergency | 60 minute | AEP, APS, DAY, DUQ |
| 1630 | 2200 | Pre-emergency | 60 minute | ATSI, COMED, DEOK, EKPC |

June 25: Mid-Atlantic, Dominion and APS

| Deploy Time (EPT) | Release Time (EPT) | Resource Type | Lead Time | Zones |
|----------------------|-----------------------|---------------|------------|--|
| 1500 | 1745 | Pre-emergency | 120 minute | APS |
| 1500 | 1810 | Pre-emergency | 120 minute | AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG |
| 1500 | 1900 | Pre-emergency | 120 minute | DOM |
| 1500 | 1745 | Pre-emergency | 60 minute | APS |
| 1500 | 1810 | Pre-emergency | 60 minute | AECO, BGE, DPL, JCPL, METED, PECO, PENELEC, PEPCO, PPL, PSEG |
| 1500 | 1900 | Pre-emergency | 60 minute | DOM |

July 28: BGE, Dominion and PEPCO

| Deploy Time | Release Time | | | |
|--------------------|--------------|---------------|------------|-----------------|
| (EPT) | (EPT) | Resource Type | Lead Time | Zones |
| 1545 | 2100 | Pre-emergency | 60 minute | BGE, DOM, PEPCO |
| 1645 | 2100 | Pre-emergency | 120 minute | BGE, DOM, PEPCO |

July 29: RTO

| Deploy Time (EPT) | Release Time (EPT) | Resource Type | Lead Time | Zones |
|----------------------|------------------------|---------------|------------|---|
| 1400 | 2045 | Pre-emergency | 60 minute | ATSI, BGE, DOM, PEPCO |
| 1430 | 2115 | Pre-emergency | 60 minute | AEP, EKPC |
| 1500 | 2045 | Pre-emergency | 120 minute | ATSI, BGE, DOM, PEPCO |
| 1500 | 2130 | Pre-emergency | 60 minute | AECO, DPL, JCPL, METED, PECO, PENELEC, PPL, PSEG |
| 1530 | 2115 | Pre-emergency | 120 minute | AEP, EKPC |
| 1600 | 2130 | Pre-emergency | 120 minute | AECO, DPL, JCPL, METED, PECO, PENELEC, PPL, PSEG |
| 1700 | 2145 | Pre-emergency | 60 minute | APS, COMED, DAY, DEOK, DUQ |
| 1800 | 2145 | Pre-emergency | 120 minute | APS, COMED, DAY, DEOK, DUQ |

August 11: BGE

| Deploy Time | Release Time | | | |
|--------------------|--------------|---------------|------------|-------|
| (EPT) | (EPT) | Resource Type | Lead Time | Zones |
| 1000 | 2000 | Pre-emergency | 60 minute | BGE |
| 1000 | 2000 | Pre-emergency | 30 minute | BGE |
| 1045 | 2000 | Pre-emergency | 120 minute | BGE |
| 1445 | 1715 | Emergency | 60 minute | BGE |
| 1515 | 1715 | Emergency | 30 minute | BGE |

PAI vs Non-PAI Events

- The summer 2025 dispatch events did not trigger a PAI.
- There are no penalties for demand resources failing to perform outside of a PAI.
- If a demand resource is dispatched only outside of Performance Assessment Events for the delivery year, its performance for the delivery year may be determined based solely on a Load Management Test.

Performance Data

- Load management compliance data for event performance is due 45 days after the month in which the event occurs.
- Data supporting requested energy settlements is due 60 days after an event.
- Due the to lag in settlements, performance data for the August 11, 2025 event is not presented
 - Will be available in 2025 Annual State of the Market Report

Performance Metric

- Load management resources were evaluated based on their ability to reduce load to their nominated Firm Service Level (FSL).
- Customer Base Line (CBL) is an hourly estimate of the load level of a demand resource in the absence of a demand response event.
- The expected hourly reduction of each resource is defined as the difference between the CBL and the FSL.
- The actual hourly reduction is defined as the difference between the CBL and the metered load.
- If a resource reduces to its FSL, then its actual reduction equals its expected reduction.

Performance Metric

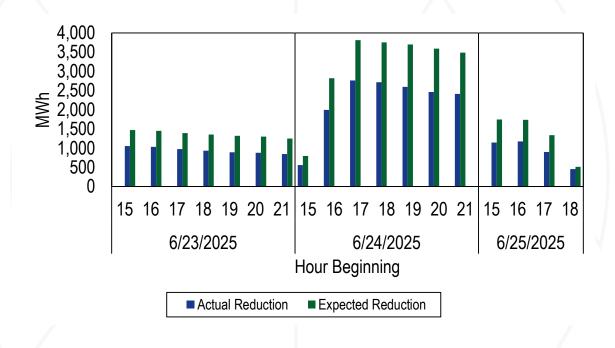
- This metric provides a better assessment of demand response performance than simply comparing metered load to FSL.
- During Winter Storm Elliott, demand resource loads were already at a reduced level when dispatched.
 - While deemed to have generally met their ICAP commitments, there was very little incremental reduction provided in order to reach their FSL.
- The difference between CBL and FSL provides a better estimate of the expected incremental reduction.
- If a dispatched registration has a CBL equal to or less than the FSL, the expected incremental reduction is zero.

Expected vs Actual Daily Performance

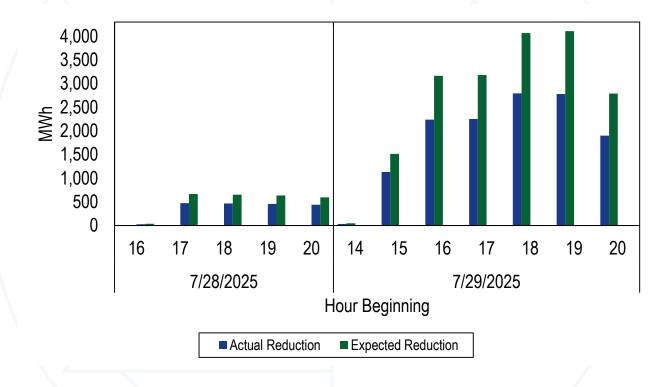
| | Actual Reduction | Expected Reduction | Percent |
|-----------|------------------|--------------------|-------------|
| Date | (MWh) | (MWh) | Performance |
| 23-Jun-25 | 6,614 | 9,540 | 69.3% |
| 24-Jun-25 | 15,506 | 21,963 | 70.6% |
| 25-Jun-25 | 3,675 | 5,339 | 68.8% |
| Total | 25,796 | 36,842 | 70.0% |

| Date | Actual Reduction (MWh) | Expected Reduction (MWh) | Percent Performance |
|-----------|---------------------------|--------------------------|------------------------|
| 28-Jul-25 | 1,866 | 2,590 | 72.0% |
| 29-Jul-25 | 13,128 | 18,868 | 69.6% |
| Total | 14,994 | 21,458 | 69.9% |

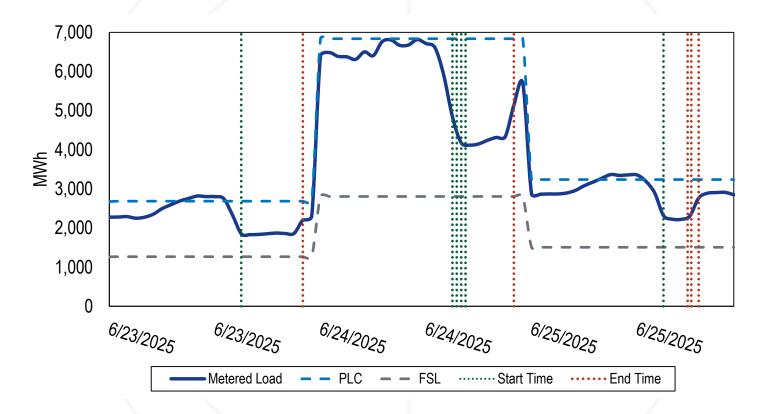
Hourly Performance: June 23-25



Hourly Performance: July 28-29

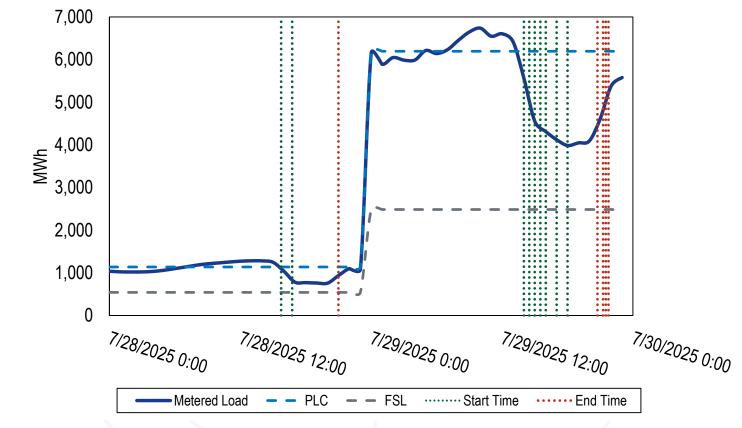


FSL, PLC and Metered Load: June 23-25



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FSL, PLC and Metered Load: July 28-29



Emergency Energy Credits

| | Deal Time Astrol | Average | | A | Emergency Load | Emergency Load | Total Foreign and |
|-----------|-------------------------------|------------------------|----------------------------|----------------|---------------------------|-----------------------------------|--------------------------------|
| Date | Real-Time Actual Relief (MWh) | Emergency Bid Price | Emergency Shutdown Cost | Average LMP | Response Energy Credit | Response Energy Make-Whole Credit | Total Emergency Energy Revenue |
| 23-Jun-25 | | \$1,143 | \$48 | \$555 | \$4,105,528 | \$3,616,557 | \$7,722,084 |
| 24-Jun-25 | 19,096 | \$1,134 | \$82 | \$662 | \$12,639,948 | \$8,862,562 | \$21,502,510 |
| 25-Jun-25 | 5,149 | \$1,132 | \$72 | \$212 | \$1,092,332 | \$4,347,255 | \$5,439,587 |
| Total | 31,642 | \$1,136 | \$67 | \$564 | \$17,837,807 | \$16,826,374 | \$34,664,181 |

| | | Average | Average | | Emergency Load | Emergency Load | |
|-----------|------------------|-----------|----------------------|---------|-----------------|-------------------|-----------------|
| | Real-Time Actual | Emergency | Emergency | Average | Response Energy | Response Energy | Total Emergency |
| Date | Relief (MWh) | Bid Price | Shutdown Cost | LMP | Credit | Make-Whole Credit | Energy Revenue |
| 28-Jul-25 | 2,140 | \$1,103 | \$3 | \$272 | \$582,748 | \$1,492,173 | \$2,074,921 |
| 29-Jul-25 | 18,977 | \$1,135 | \$82 | \$189 | \$3,583,311 | \$18,009,167 | \$21,592,478 |
| Total | 21,117 | \$1,119 | \$42 | \$197 | \$4,166,059 | \$19,501,339 | \$23,667,399 |

Conclusions and Recommendations

- Load management resources have the same obligation to perform when called upon, regardless of whether the dispatch event occurs as part of a PAI or not.
- There is no reason therefore to allow the optionality of testing in lieu of using non-PAI event performance.
- If demand resources are only subject to non-PAI dispatch events during the delivery year, their ability to meet their obligations are best defined by actual operational performance rather than through a test.
- The MMU recommended in 2023 that PJM revise its Tariff to include an event specific measurement for dispatch occurring outside of PAI events and penalties for nonperformance.

Monitoring Analytics

Next Steps

- November 20 MRC: DR/PRD Issue Charge Endorsed
 - Load Management and PRD incentives and penalties may be insufficient to ensure performance.
 - Process and/or system changes
 - Corresponding revisions to the PJM Tariff or other governing documents as applicable will be brought to the MRC and MC for review and endorsement.
 - Proposed revisions to PJM Manuals conforming to the FERC approved solution will be brought to the appropriate Committees for review and endorsement.

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- CBIR-lite at MIC starting December 3
- Filing: April 2026

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Implementation: 2028/2029 BRA (June 2026)

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