

# Problems With Dual Participation and CBL Approach

SODRSTF

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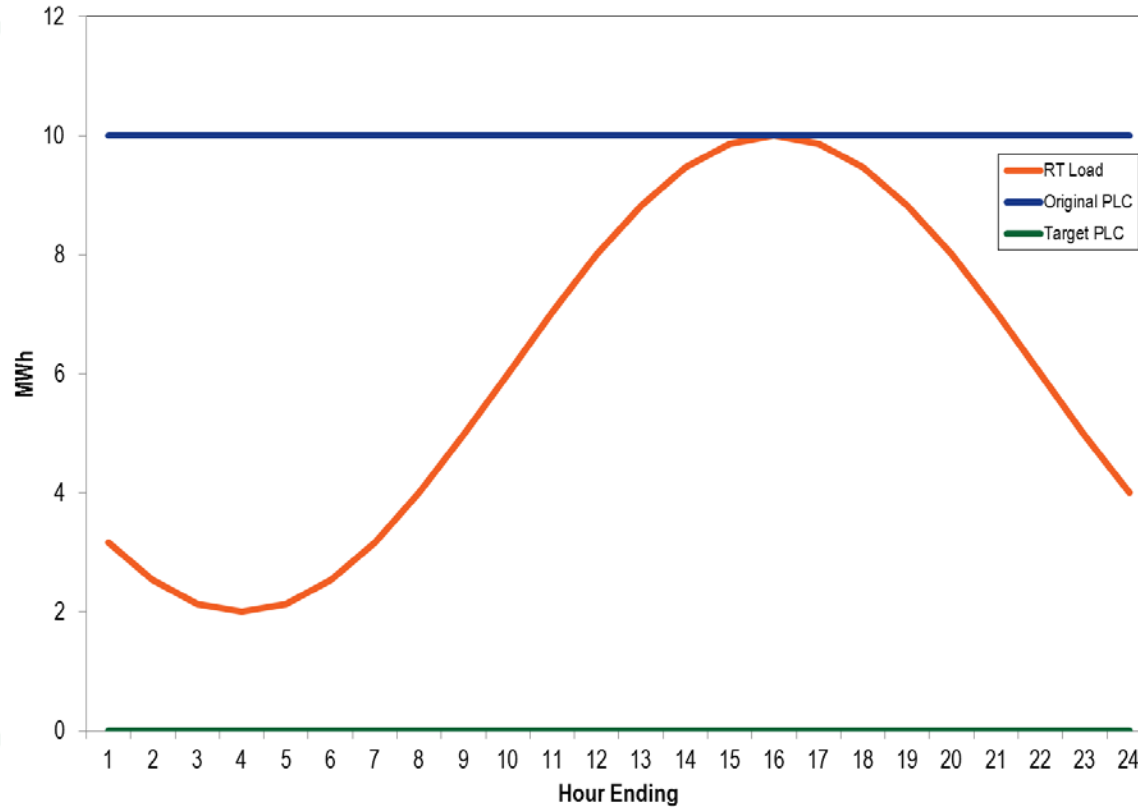


Monitoring Analytics

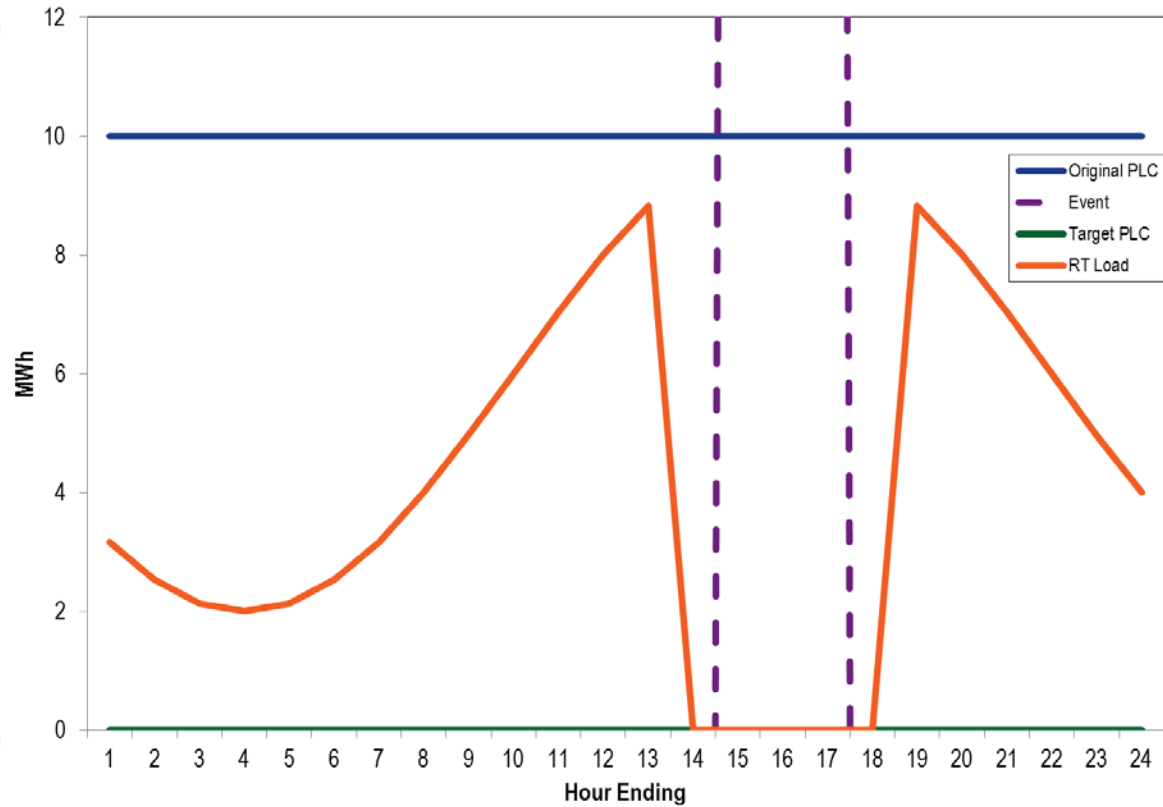
# Participation Scenarios

- **Single Product**
  - **Full participation**
  - **Partial Participation**
- **Dual Participation**

# Full Participation, No Event



# Full Participation, Event

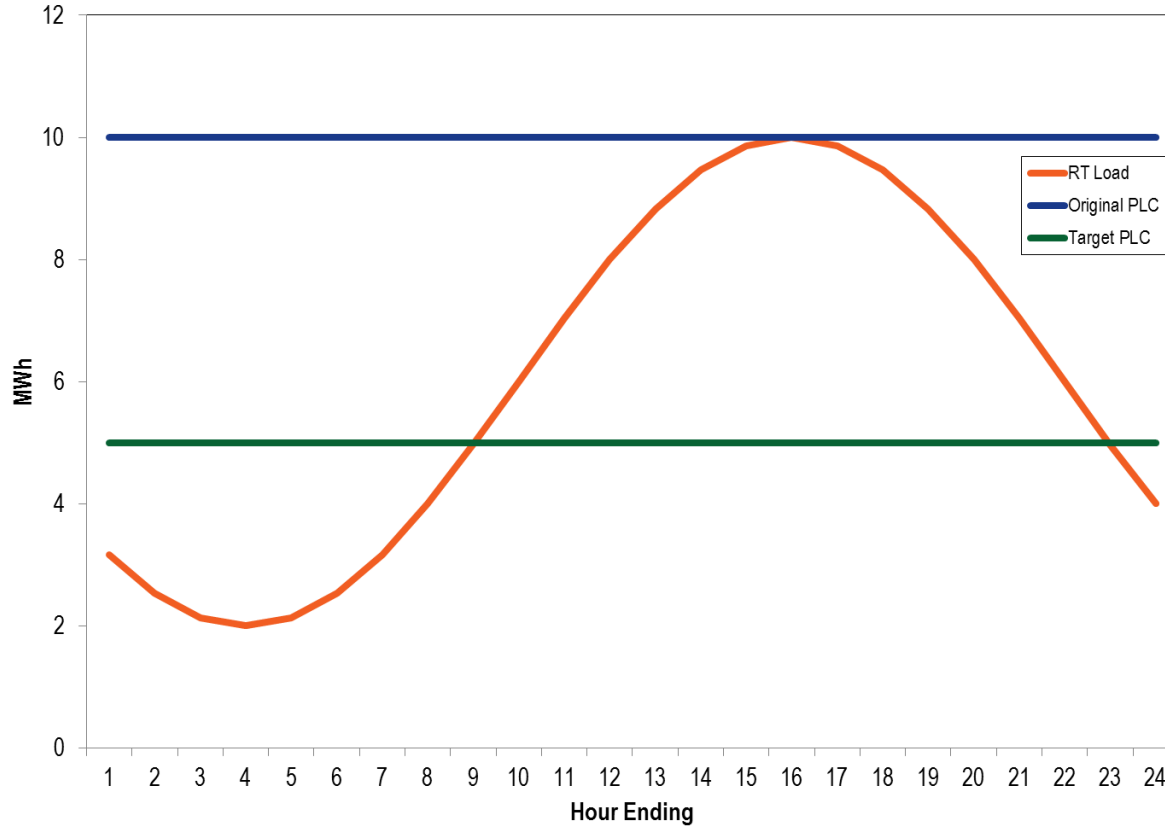


# Full Participation

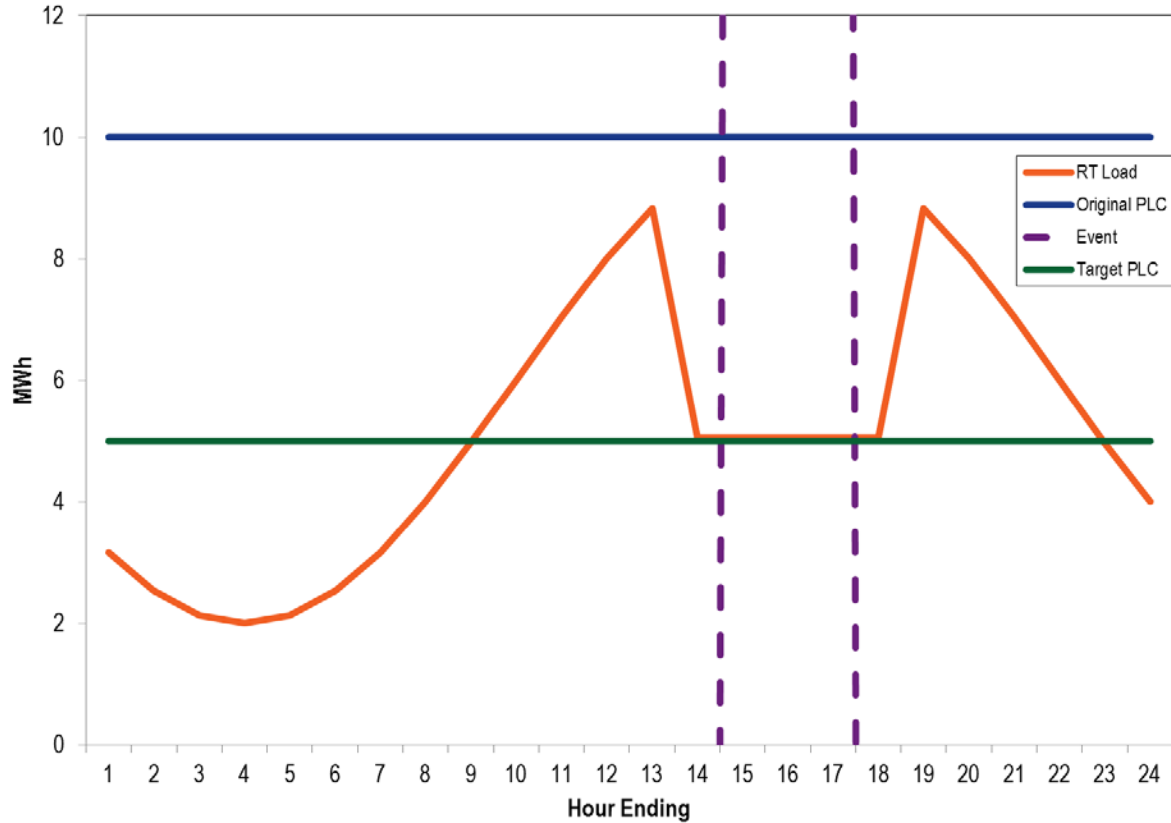
- **All capacity MW fully allocated**
- **Allowing participation with another program is double counting capacity MW**



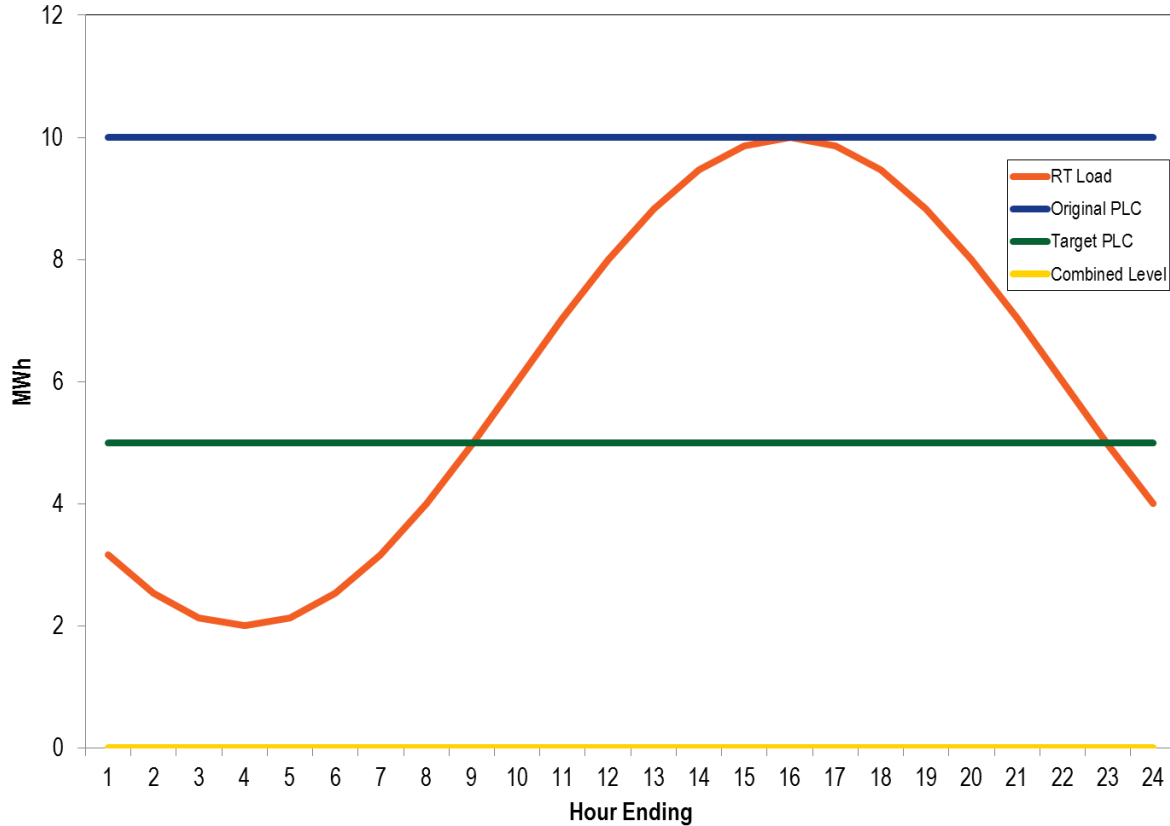
# Half Participation, No Event



# Half Participation, Event

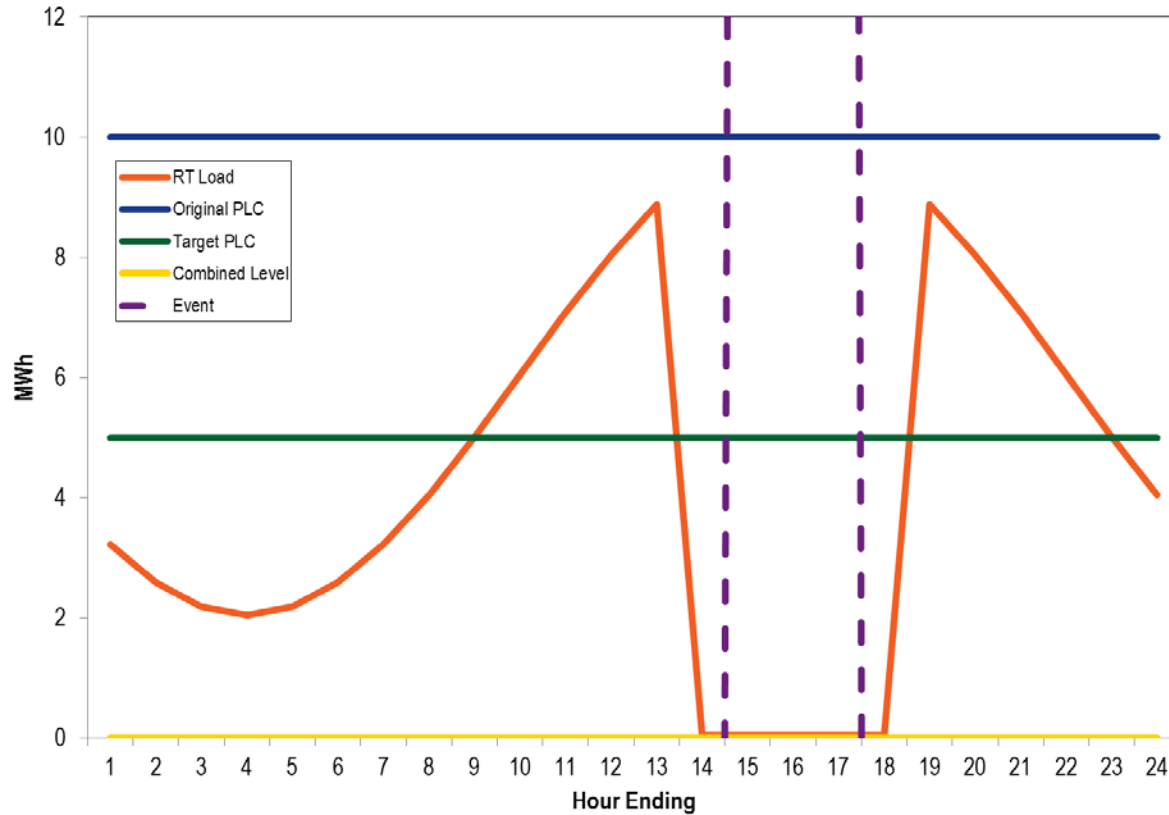


# Dual Participation





# Dual Participation, Event



# Results

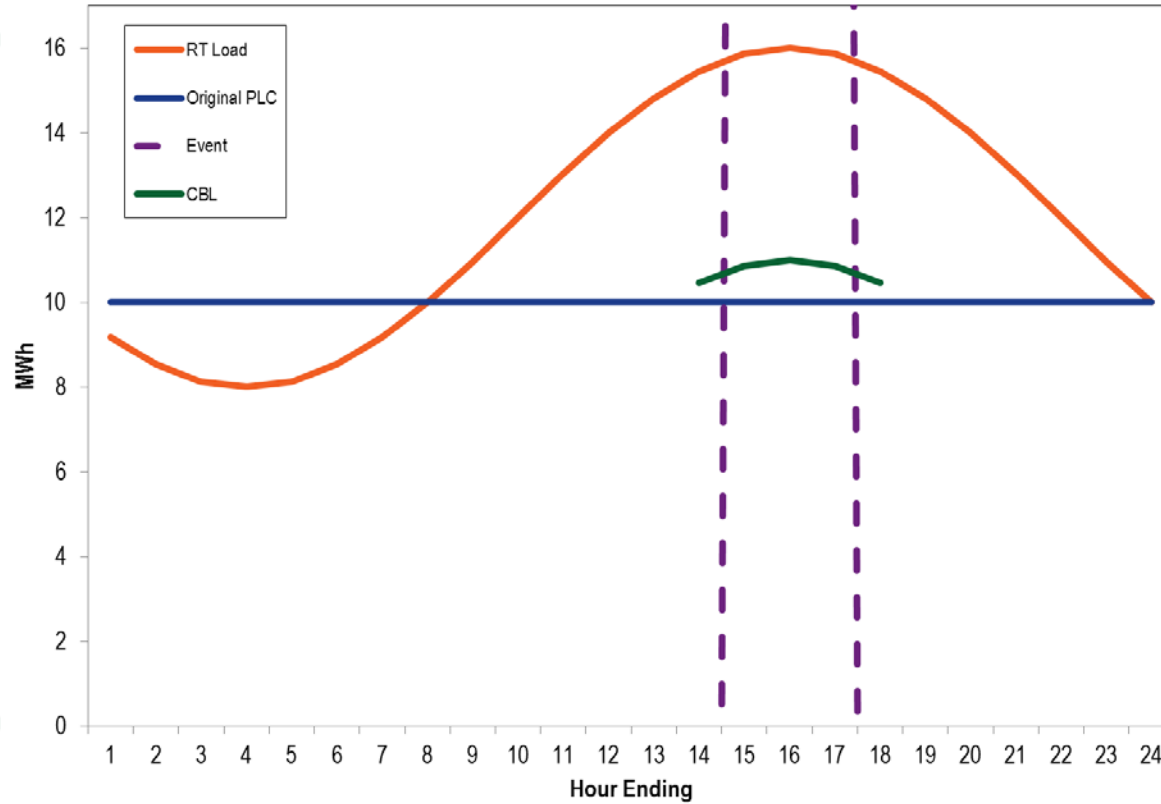
- **Same outcome as full participation in a single product**
- **No reason to allow participation across product types**
- **Participants must pick one product type**
- **Allowing dual participation results in potential gaming and FERC referrals**



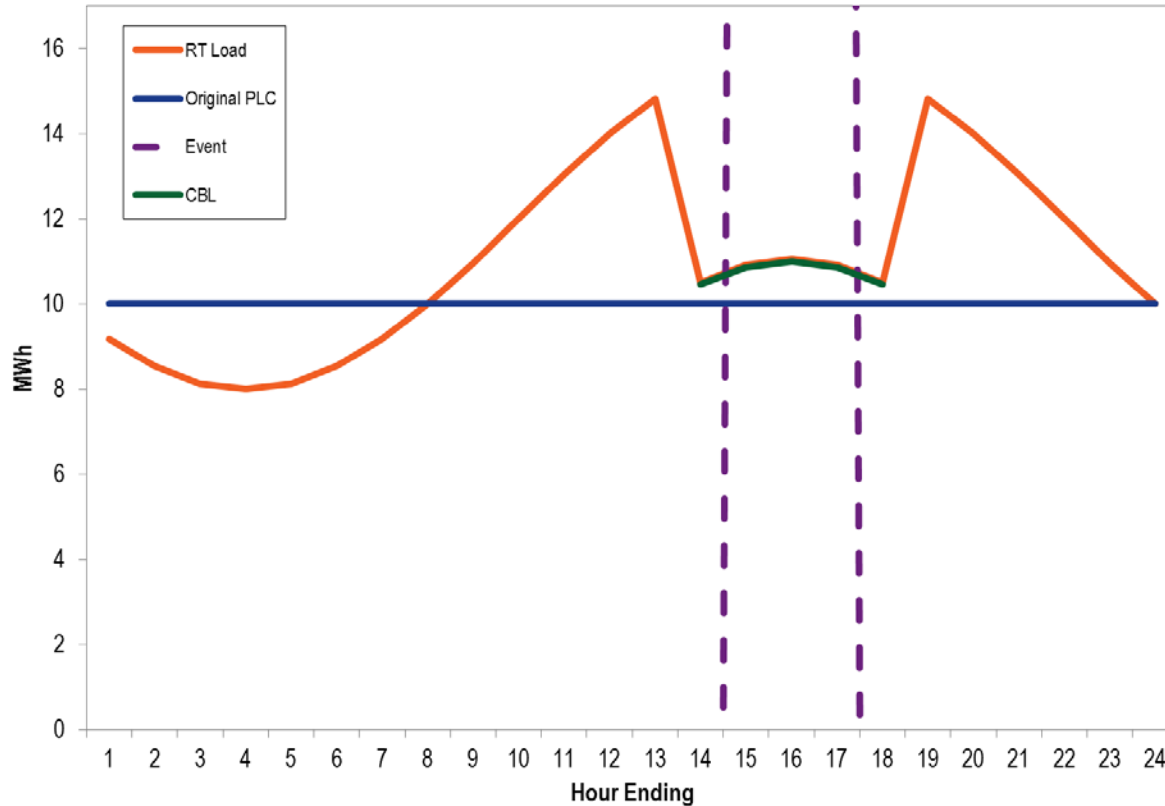
# CBL M&V Complications

- **“...referenced to a baseline that is the lesser of a customer’s PLC, or comparison load, PJM has ensured that resources will respond to peak period emergencies in a manner consistent with the RPM procurement process.” – ER11-3322-000 (Nov 4, 2011)**
- **Proposals should not count reductions from above PLC**
- **Measuring energy reductions to shift VRR curve is inconsistent with the RPM procurement process**

# CBL Approach



# CBL Above PLC



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