

Affirmed Energy Package for MIC

June 2024 MIC

Addressing the IMM's 206

- IMM filed 206 complaint
- PJM stopped payment to EE resources
- FERC has yet to respond
- Venue for discussion is unacceptable

The MIC risks putting the cart before the horse.

- PJM is advocating for a slate of Energy Efficiency reforms that are incompatible with the vast majority of EE Resources currently operating.
- The changes will have the effect of **almost completely eliminating EE from the market.**
- PJM's approach presupposes a solution without engaging in earnest education and exploration of the options. We and others have identified opportunities to improve upon the status quo that would greatly benefit customers and support reliability.
- Demand is growing. EE should be enabled to be a bona fide capacity resource.

We have two options:

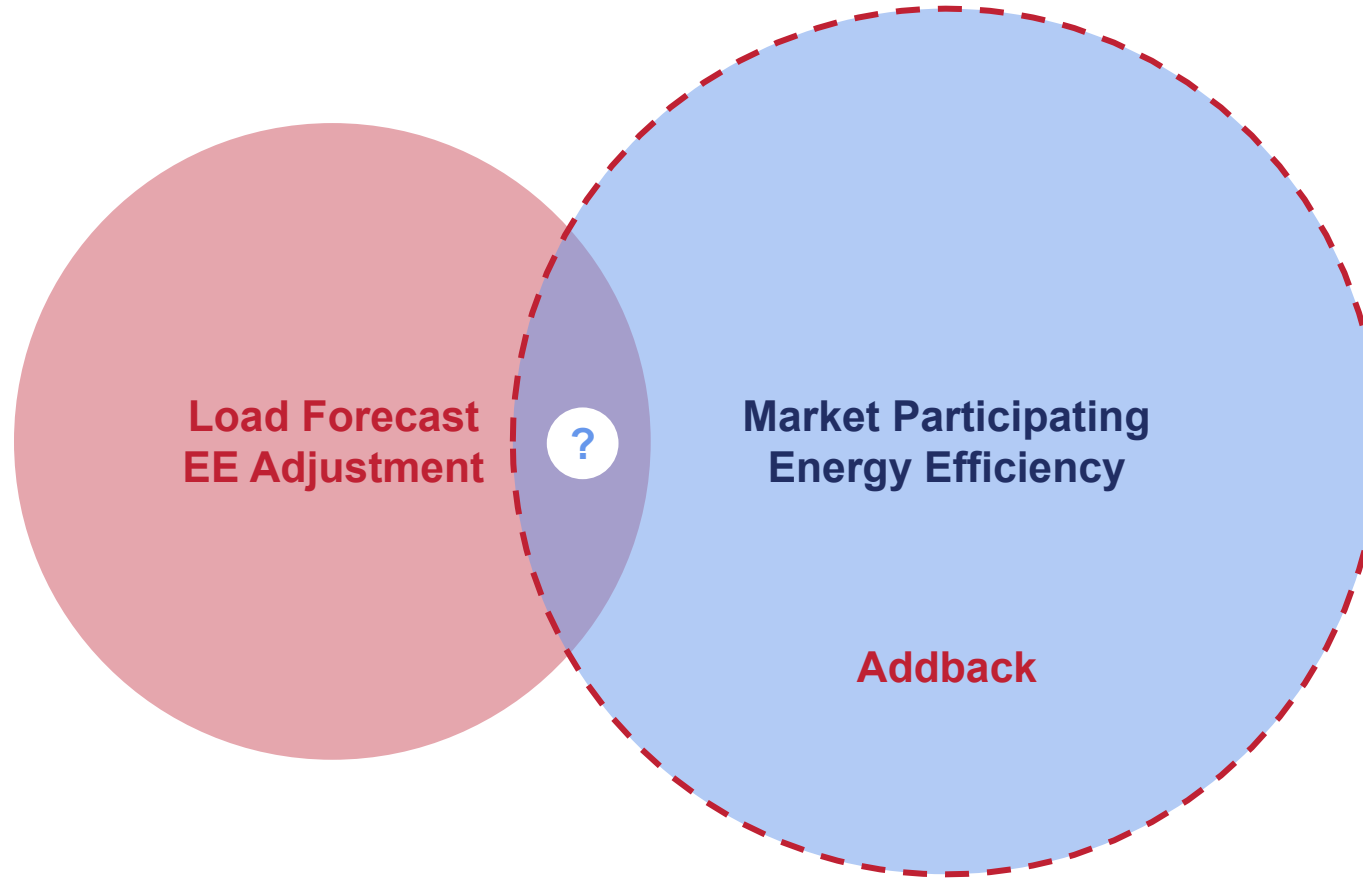
PJM & IMM Proposals:

- Eliminate or arbitrarily compress EE in the market.
- Less EE will materialize.
- The load forecast will over-estimate future EE and reliability will suffer.

Affirmed Proposal:

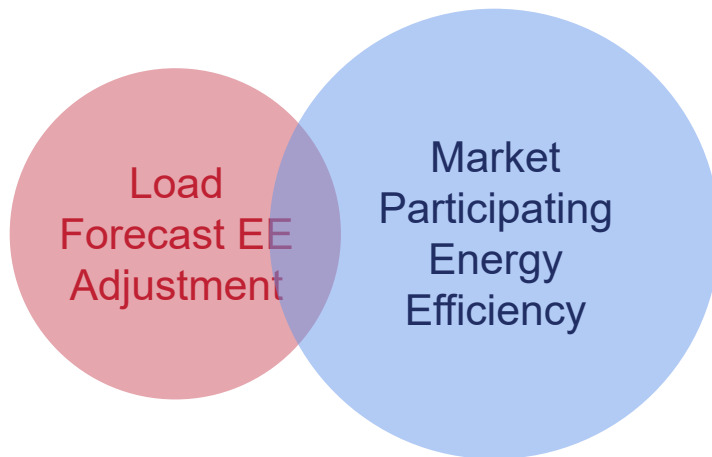
- **Eliminate the Addback.**
- Only incremental EE will be counted and compensated.
- Reliability will improve and capacity costs will be reduced for consumers.

Addback Status Quo. Because of “?” we add back - - -

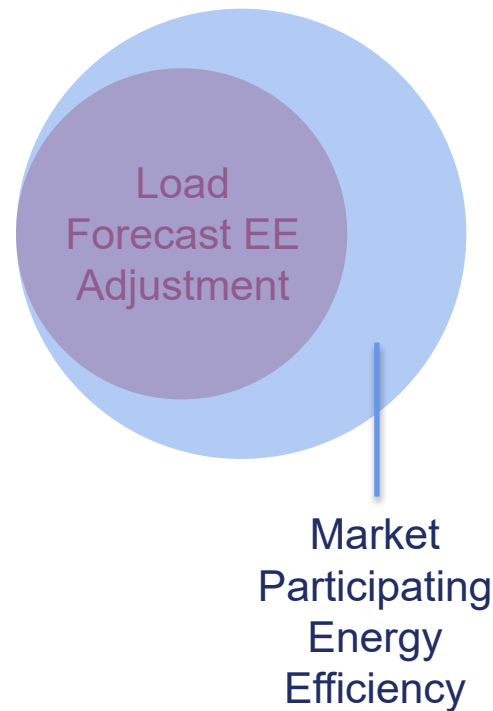


There are 3 potential scenarios:

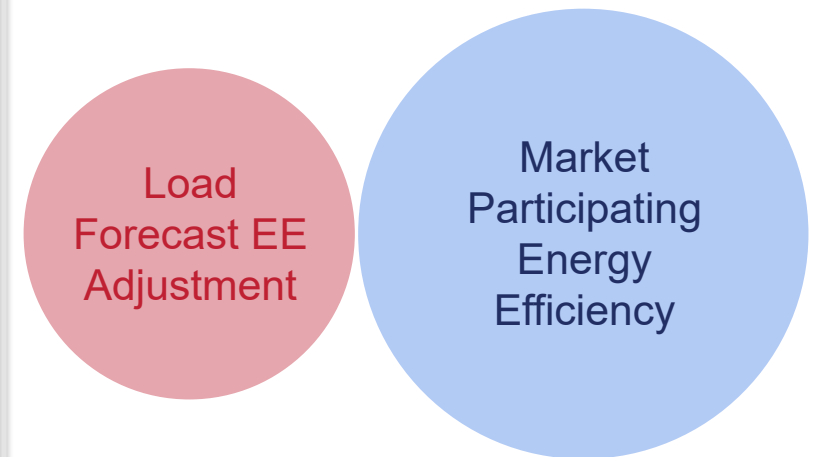
Some Overlap



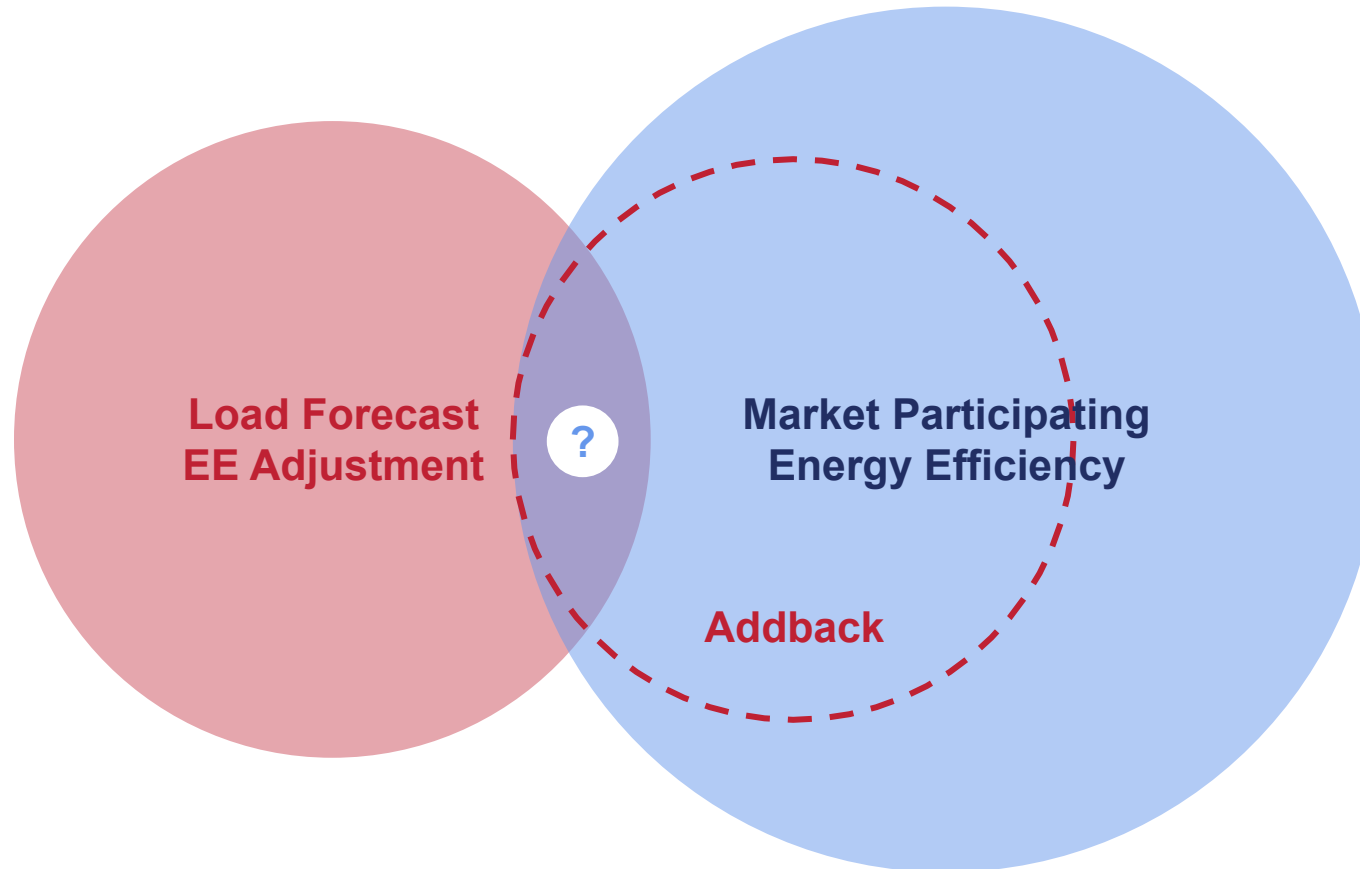
Complete Overlap



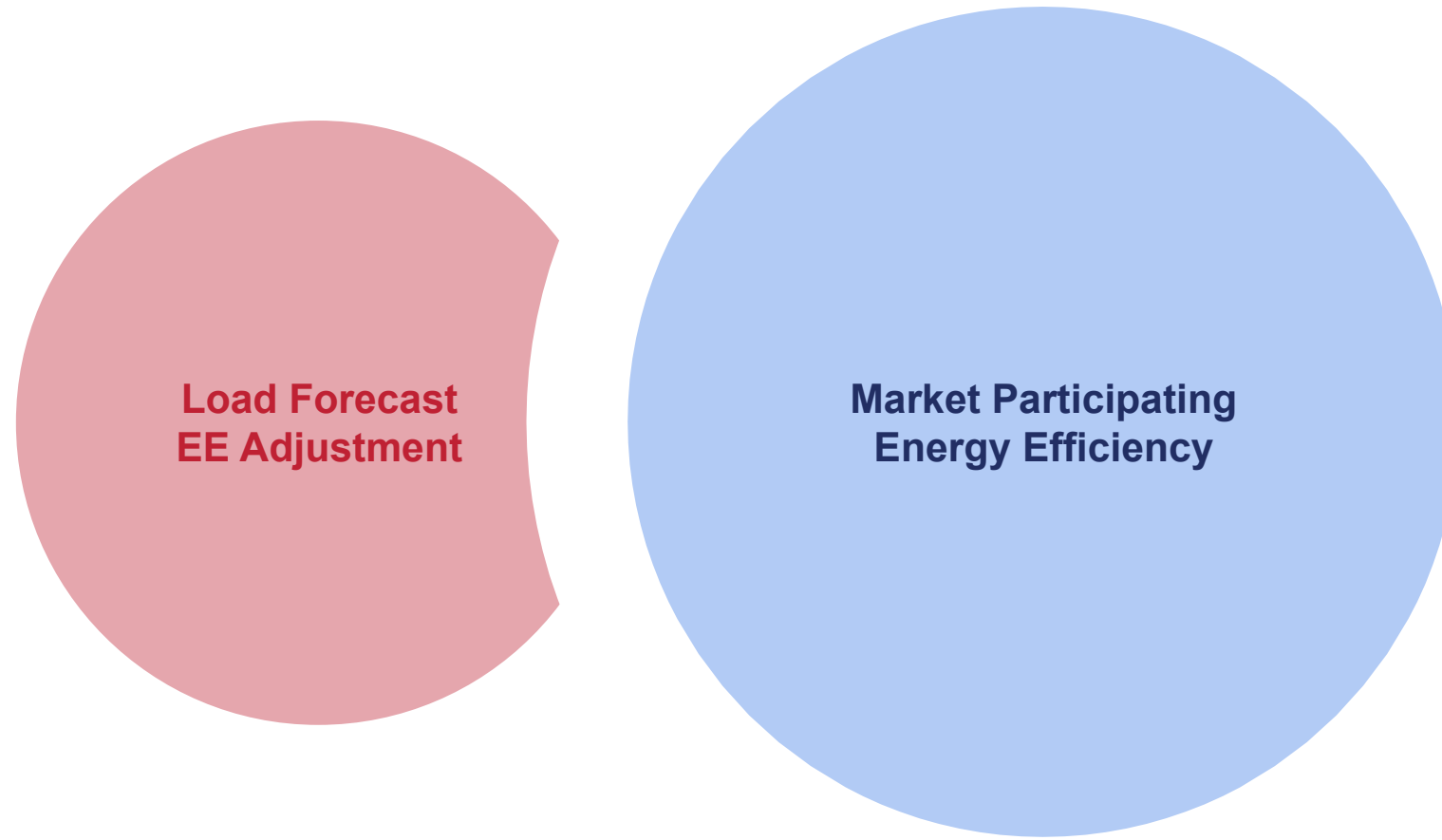
No Overlap



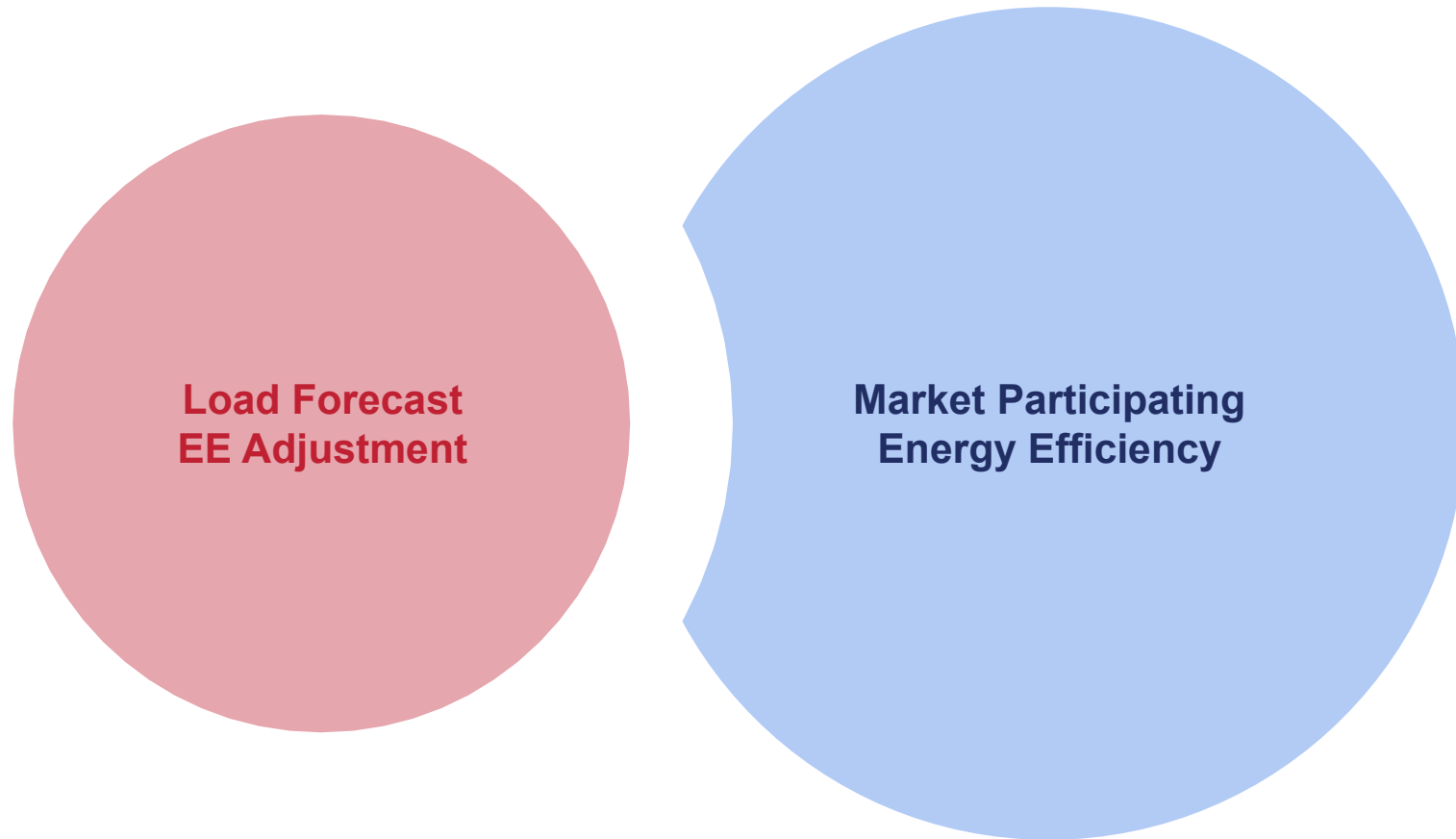
Option 1: Add back the lesser of the EE adjustment or the Market EE. Because of “?” we add back - - -



Option 2: Eliminate the Addback by Changing the Load Forecast EE Adjustment



Option 3: Eliminate the Addback by Limiting Market EE, using the Load Forecast EE as Baseline



Option 3: Eliminate the Addback by Limiting Market EE, using the Load Forecast EE from NEMS as Baseline

- Big Picture: Use the inputs to the Annual Energy Outlook, the basis for PJM's load forecast EE adjustment, to create baselines for all Market Participating EE. *Only qualify EE that is not already in the load forecast.*
- How: Derive baselines from the EIA-maintained, freely available, open source model published as the “**National Energy Modeling System (NEMS)**.” This is the source data for the AEO.
- Limitations: Some state programs are included in the AEO model so those programs would either reduce their qualified projects to the incremental ones or we would need to establish a (much smaller) addback for those programs.

Option 3: What's in the NEMS

- Four supply modules:
 - Renewable Fuels Module (RFM)
 - Natural Gas Market Module (NGMM)
 - Oil and Gas Supply Module (OGSM)
 - Coal Market Module (CMM)
- Four demand modules:
 - Residential Demand Module (RDM)
 - Commercial Demand Module (CDM)
 - Industrial Demand Module (IDM)
 - Transportation Demand Module (TDM)
- Two conversion modules:
 - Electricity Market Module (EMM)
 - Liquid Fuels Market Module (LFMM)
- Four other modules:
 - Macroeconomic Activity Module (MAM)
 - International Energy Module (IEM)
 - Emissions Policy Module (EPM)
 - Integrating Module

“NEMS calls each supply, conversion, and end-use demand module in sequence until the modeling system reaches an equilibrium between supply and demand. The AEO offers a solution for each year through 2050.”

Option 3: E.g. what's in the NEMS Residential Data?

- Space Heating
- Space Cooling
- Water Heating
- Cooking
- Clothes Drying
- Clothes Washing
- Dishwashing
- Refrigeration
- Freezing
- Lighting
- TV and Set-Top boxes
- PC's and Related Equipment
- Secondary Heating
- Furnace, Fans and Boiler Circulation Pumps
- Ceiling Fans
- Coffee Makers
- Dehumidifiers
- Microwaves
- Pool Pumps
- Pool Heaters
- Portable Electric Spas
- Non-PC Rechargeable Electronics
- Tablets
- Smartphones
- Smart Speakers
- Security System
- Wine Coolers
- Small Kitchen Appliances

Option 3: What type of data is available?

Lighting

General Service – Incandescent and Halogen	GSL-INC	Lighting	lumens per watt
General Service – Compact Fluorescent Lamp (CFL)	GSL-CFL	Lighting	lumens per watt
General Service – Light-Emitting Diode (LED)	GSL-LED	Lighting	lumens per watt
Reflector (Incandescent)	REF-INC	Lighting	lumens per watt
Reflector (Halogen)	REF-HAL	Lighting	lumens per watt
Reflector (CFL)			
Reflector (LED)			
Linear Fluorescent (T12)			
Linear Fluorescent (T8)			
Linear Fluorescent (LED)			
Exterior (Incandescent and Halogen)			
Exterior (CFL)			
Exterior (High-pressure Sodium)			
Exterior (LED)			

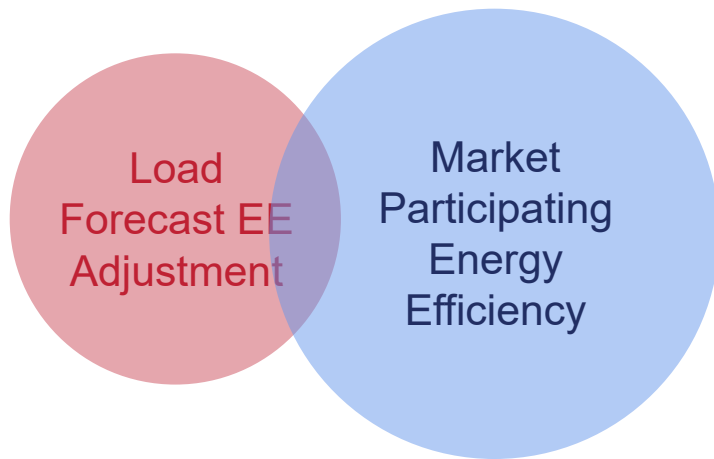
- By relying on bottom-up modeling for most of the critical end-uses, NEMS requires the same data EE Providers currently measure and study for PIMV Reports and Plans.
- This includes **market penetration over time** and **all essential stipulated values** for things like Residential and Commercial Lighting.

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1 FILE NAME: RSMLGT
2 DATE MODIFIED: November 9, 2022
3 USED BY: RSMLGTREAD subroutine of the National Energy Modeling System (NEMS) Residential Demand Module (RDM)
4 DEFINITION: Self-contained lighting technology and usage database for the RDM
5 UNITS: See specific sections and headings below
6 DIMENSION: year, census division, bulb application, bulb type
7 SPECIAL CONSTRAINTS: non-negative values; each group of 11 lines (equipment classes per CD) must sum to 1
8 ORGANIZATION OF DATA: See specific sections and headings below
9 Current parameters allow 4 lighting applications with up to four bulb technologies in each
10 Data starts on row 21 of this file as per RDM convention.
11 SOURCES: EIA - Technology Forecast Updates - Residential and Commercial Building Technologies - Reference Case,
12 EIA/Guidehouse, October, 2022; 2015 RECS; 2015 U.S. Lighting Market Characterization, EERE, Nov 2015;
13 Residential Lighting End-Use Consumption Study: Estimation Framework and Initial Estimates, EERE, Nov 2015; NEMA Lamp Indices Report
14 COMMENT: updated utility energy efficiency subsidies (EE_Sub1 to EE_Sub9), revised technology cost and performance characteristics per new technology report, updated
15
16
17
18
19
20 Dollar Year for Cost Data (RLGTDOLLARYR)
21 2022
22
23 Number of Applications (NumApps) (i.e., GSL, reflector, linear fluorescent, exterior)
24 4
25
26 Application Labels AppIDs(-) Char#3 Data and Order in Data File AppIndex()
27 GSL REF LFL EXT
28 1 2 3 4
29
30 Number of BulbType by Application (NumTypes); Number of usage bins (i.e., hours used) by application (NumAppBins)
31 GSL REF LFL EXT
32 3 4 3 4
33 6 1 1 1
34
35 Technology Cost and Performance (years assumed not to overlap within an application bulb type)
36 (Note read this section until 9999 is encountered for FirstYear)
37 FirstYr LastYr Cost EE_Sub1 EE_Sub2 EE_Sub3 EE_Sub4 EE_Sub5 EE_Sub6 EE_Sub7 EE_Sub8 EE_Sub9 Sub1 Sub2 Sub3 Sub4 Sub5 Sub6 Sub7 Sub8 Sub9 LmV
38 2015 2019 2.36 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 17.
39 2020 2021 4.90 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 17.
40 2022 2022 5.92 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 17.
41 2023 2050 999.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 17.
42 2015 2019 2.55 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 63.

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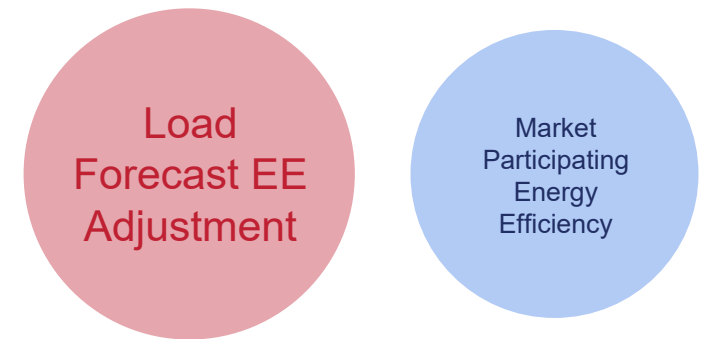
Status Quo



Remove Overlap (by shrinking Market EE)



Future State without Addback



Next Steps (in normal times):

- PJM and Stakeholders - Engage with the EIA, Itron and others to establish load forecast-informed baselines.
- PJM - Figure out whether reduced qualification or modified addback is more appropriate for state and federal programs that leverage capacity market as a source of funding
- PJM - Publish new load forecast compatible baselines
- Market Participants - Update M&V Plan and Reports using new baseline values.

Rather than arbitrarily compressing EE through qualification changes, PJM should work toward realizing all of the benefits of EE.

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