Indiana Utility Regulatory Commission

Implementation of FERC Order 2222

September 14, 2023
Agenda

Introduction
- Who I Am
- Who We Are
- How It Works

IURC Regulation
- Jurisdiction and Regulatory Schemes
- Operational/Interconnection Issues

Conclusion
Introduction

- Who I Am - Past and Present
- Who We Are - Past and Present
- How We Do It - From Customer Agreement To Registration To Market
VoltApp™ is the only distributed energy resource (DER) platform that connects any DER type to any wholesale energy market in North America.

More markets means more cash earning opportunities for customers.
Voltus is the only provider in all nine US and Canadian power markets.
Steps for enrollment

- Customer Voltus Agreement
- Voltus obtains data on facilities and kilowatts to be enrolled
- All RTOs/ISOs require notification to the LSE/EDC and RERRA who have opportunity to question/object to registration (including for double counting concerns).
  
  Letter lists:
  - Name of load
  - MW offered
  - Retail provider
  - Targeted effective date
- Voltus requests interconnection data from utility (directly or through RTO) and provides resource/location data to RTO
- Finalize curtailment plan
- Install Voltlet
- Conduct Dispatch Verification, insures ICCP integration.
- All RTO/ISOs require telemetry integration to send dispatch signals, to measure performance and determine payment/penalties
  - Utilities have access to ICCP data
- Designate registration as “dispatchable”
• Data recorder reads utility meter’s KYZ pulse
How Payment Works

Customers get paid to reduce electricity use, just like a generator gets paid to provide electricity.

Customer → Facilitates customer curtailment

Aggregator

- Sends dispatch signal
- Transmits data through telemetry
- Pays and/or penalizes
- Pays penalties

Pays customer

PJM

MISO
IURC Regulation

JURISDICTION AND REGULATORY SCHEMES

- Ind. Code § § 8-8-1-2-1(a) and/or 8-1-2.5-2 - Public or Energy Utility Status?
- Declination Ind. Code § 8-1-2.5-2?
- Models - Retail Tariffs Requiring Notification/Reporting from Customer
  - Oklahoma - Cause No. PUD 2022-000172
  - Kansas - Docket No. 23-EKCE-588-TAR
- Benefits
  - Customer Protection Function
  - Data Provision To Utilities
  - No Conflict With MISO/PJM Rules or FERC Order 2222 Implementation
  - Reduced Regulatory Burden for Customers and Commission - Commission Oversight If Conflicts Arise
  - Contract Between Customer/ARC Maintained As Private Business Arrangement
IURC Regulation

OPERATIONAL/INTERCONNECTION ISSUES

- **ADMS/DERMS**
  - Not necessary for traditional demand response that is not injecting
  - For injecting DERS, need is incremental to DER penetration
  - Level of penetration determines configuration
  - Incremental implementation allows IURC to require financial and engineering evidence for particular infrastructure under rate of return regulation
IURC Regulation

OPERATIONAL/INTERCONNECTION ISSUES Cont’d

- Distribution Study for Each Component DER
  - Utilities should be studying at the aggregate level.
  - Aggregators need flexibility to mix and match within the aggregation.
  - Component DERs have long existed and been accounted for.
  - Component info is available from interconnection agreements.
  - Aggregate resource info is provided at wholesale market registration.
  - Study assumptions:
    - Full capacity
    - Maximum load masking
    - Wholesale participation
IURC Regulation

OPERATIONAL/INTERCONNECTION ISSUES Cont’d

- No need for duplication/contradiction of MISO/PJM.
  - RTOs/ISOs provide
    - Full and transparent participation by all stakeholders
    - Expertise
  - RTO/ISOs determine
    - Creditworthiness
    - Time requirements for study and approval of registrations
    - Telemetry requirements
    - Performance measurement and verification
    - Notice to LBAs of all demand response enrollments, dispatches, and performance
IURC Regulation

OPERATIONAL/INTERCONNECTION ISSUES Cont’d

- Utility dispatching of ARC-managed DERs would:
  - Allow utility to decide dispatches but ARCs bear penalties for non-performance
  - Require utility investment for technology despite existing ARC technology
- For utility override of DER dispatches, IURC should require:
  - Clear criteria that justify distribution system overrides
  - Procedures for advanced notice
  - After-the-fact justification review
IURC Regulation

OPERATIONAL/INTERCONNECTION ISSUES Cont’d

- Metering and Telemetry
  - Separate production meters
    - pricey infrastructure investments
    - barriers to entry
  - Better solution: AMI with existing interval or sample metering techniques
Conclusion

- Regulatory Review: New Infrastructure vs. DER Deployment
- MISO/PJM Vetting: Transparency/Access/Expertise
- Displacing RTO/ISO Erects Barriers and Thwarts Competition
- Duplicative/Inconsistent Standards Will Cost Indiana Ratepayers Money
Questions?

Contact us:

Voltus, Inc. Voltus.co

✉️ info@voltus.co
📞 (415) 463-4236

2443 Fillmore Street, #380-3427
San Francisco, CA 94115

Joann Worthington- Senior Manager Regulatory Affairs
Voltus, Inc. | Oklahoma City, OK
📞 405-653-8138 | jworthington@voltus.co | http://www.voltus.co/vlog