

# Proposed changes to the Monthly Regional Network Load

vermont electric power company



July 2021

# Behind-the-Meter load reconstitution

- August 2020: New England Internal Market Monitor identified potential tariff non-compliance
- Overall impact to VT around \$2M annually
- Roughly a 9 month stakeholder process
- TOs jointly developed tariff amendment to resolve issue

# Proposed tariff changes to RNL

## Section I General Terms and Conditions

**Regional Network Load** is the load that a Network Customer designates for Regional Network Service under Part II.B of the OATT. The Network Customer's Regional Network Load shall include all load designated by the Network Customer (including losses). ~~and shall not be credited or reduced for any behind the meter generation.~~ A Network Customer may elect to designate less than its total load as Regional Network Load but may not designate only part of the load at a discrete Point of Delivery. Where a Transmission Customer has elected not to designate a particular load at discrete Points of Delivery as Regional Network Load, the Transmission Customer is responsible for making separate arrangements under Part II.C of the OATT for any Point-To-Point Service that may be necessary for such non-designated load. **A Network Customer's Monthly Regional Network Load shall be calculated in accordance with Section II.21.2 of the OATT.**

# Tariff language to Monthly RNL

- **II.21.2 Determination of Network Customer's Monthly Regional Network Load:** Network Customer's "Monthly Regional Network Load" is its hourly load (including its designated Regional Network Load not physically interconnected with the PTF under Section II.18.3 of this OATT) coincident with the coincident aggregate load of all Network Customers served in each Local Network in the hour in which the coincident load is at its maximum for the month ("Monthly Peak"). **Network Customer's Monthly Regional Network Load shall exclude (i) load offset by any resource that is not a Generator Asset, and (ii) load offset by the portion of the output of a Generator Asset that serves load located behind the same retail customer meter as the Generator Asset.** For Regional Network Load located within the New England Control Area, the Monthly Regional Network Load of all Network Customers within a Local Network shall be calculated by the associated PTO. For Regional Network Load located outside of the New England Control Area, the Monthly Regional Network Load of all Network Customers shall be calculated by the associated PTO (in consultation with the ISO and the associated Balancing Authority).

Generator Asset is a device (or a collection of devices) that is capable of injecting real power onto the grid that has been registered as a Generator Asset in accordance with the Asset Registration Process.

# Regional support for proposal

- Voting requires 66% in favor to pass
- Support earned:
  - PTO-AC (100%)
  - Transmission Committee (88.9%),
  - Markets Committee (94.4%)
  - NEPOOL Participants Committee vote in favor
- TO's developed filing and submitted to FERC on 7/1/2021
- Very strong position before FERC given support of TOs, ISO-NE and NEPOOL

# Schedule

- Nov 17: PTO-AC discussion
- Dec 10:
  - Introductory discussion at Transmission Committee
- Jan:
  - Introductory discussion at Markets Committee
  - 1/26: Follow-up discussion at TC
- Feb:
  - Feedback from TC
  - Revised proposal at MC
- Mar 23: Revised proposal at TC
- April 6&27:
  - 4/6 Discussion at MC
  - 4/9 Unanimous Vote at PTO-AC
  - 4/27 Vote in favor at the TC
- May 11: Vote at MC
- June:
  - 6/3 Vote at NPC
  - 7/1 File at FERC
- September: Effective date