

# 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

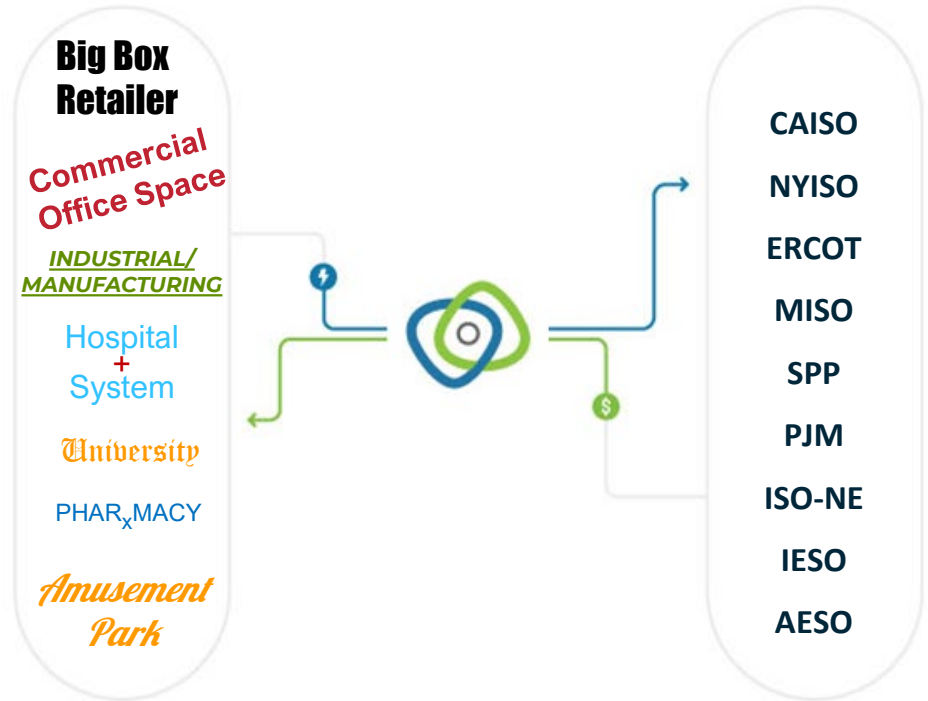
# Introduction

- 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.



Demand response



Energy efficiency



Distributed generation

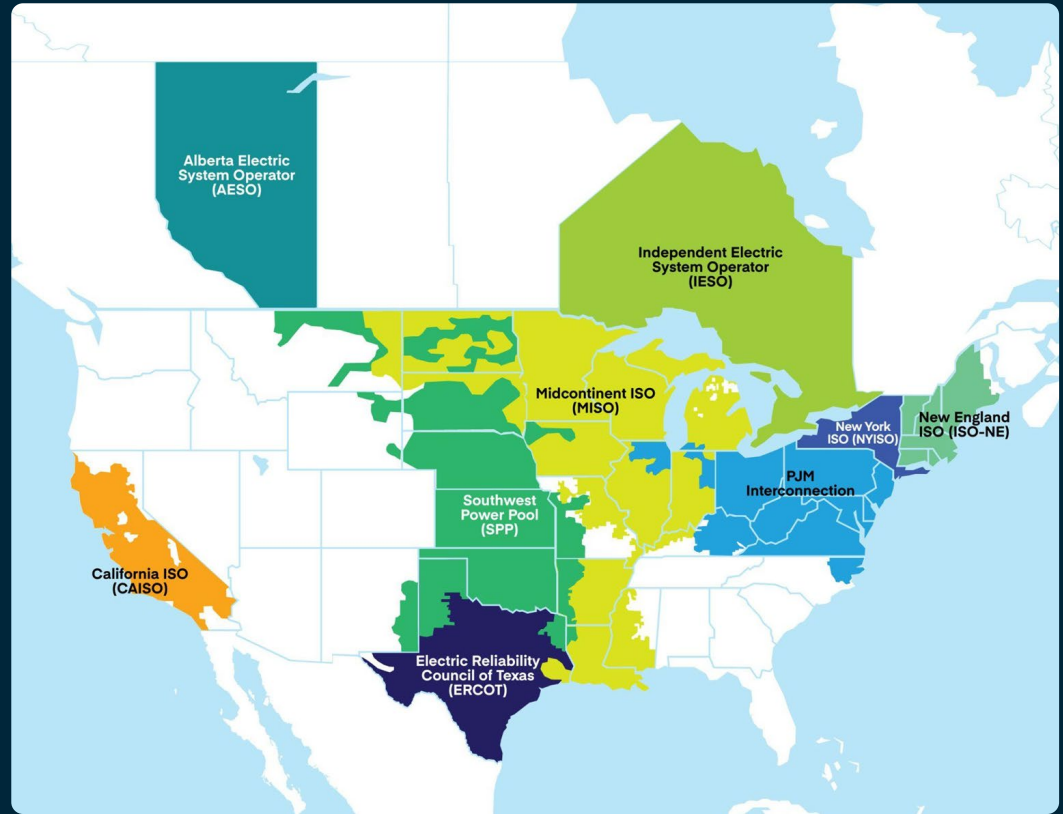


Energy storage systems



EVs & EV infrastructure

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, insure 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”

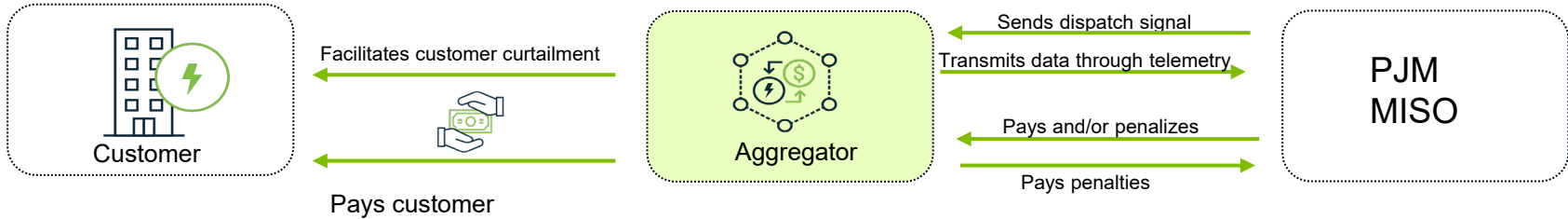




- Data recorder reads utility meter's KYZ pulse

# How Payment Works

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

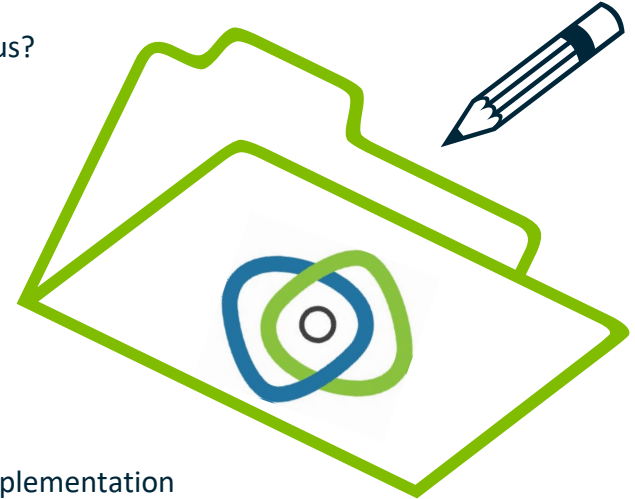




# IURC Regulation

## JURISDICTION AND REGULATORY SCHEMES

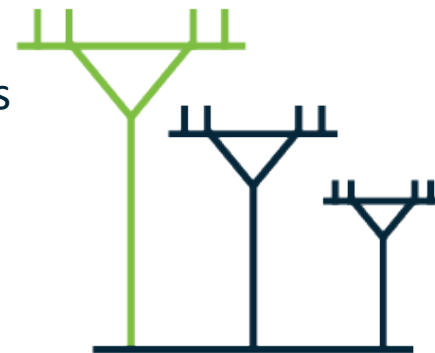
- Ind. Code § § 8-8-1-2-1(a) and/or 8-1-2.5-2 -Public or Energy Utility Status?
- Declination Ind. Code § 8-1-2.5-2?
- Models-Retail Tariffs Requiring Notification/Reporting from Customer
  - Oklahoma-Cause No. PUD 2022-000172
  - Kansas- Docket No. 23-EKCE-588-TAR
  - Benefits
    - Customer Protection 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

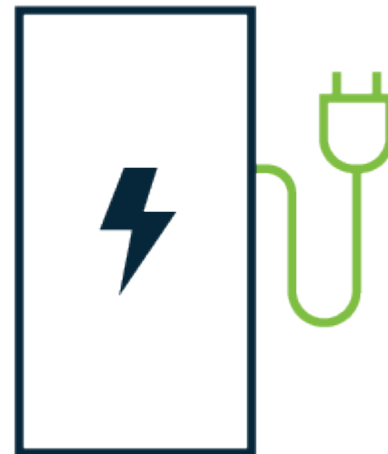
- ADMS/DERMS
  - Not necessary for traditional demand response that is not injecting
  - For injecting DERS, need is incremental to DER penetration
  - Level of penetration determines configuration
  - Incremental implementation allows IURC to require financial and engineering evidence for particular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



# IURC Regulation

## OPERATIONAL/INTERCONNECTION ISSUES Cont'd

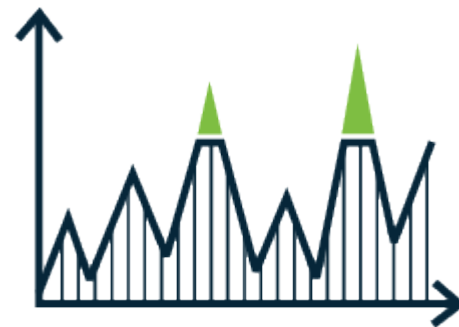
- Distribution Study for Each Component DER
  - Utilities should be studying at the aggregate level.
  - Aggregators need flexibility to mix and match within the aggregation.
  - Component DERs have long existed and been accounted for.
  - Component info is available from interconnection agreements.
  - 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?

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