

May 29, 2024

VIA E-FILING

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

**RE: ADVANCE NOTICE OF PROPOSED RULEMAKING ORDER: Distributed Energy
Resource Participation in Wholesale Markets Investigation
PA PUC Docket No. L-2023-3044115**

Dear Secretary Chiavetta,

Please see attached comments by Renew Home, LLC (“Renew Home”) on the Pennsylvania Public Utility Commission’s (“PA PUC” or “Commission”) Advance Notice of Proposed Rulemaking Order (“ANOPR”) to investigate the PUC’s role in the implementation of FERC Order 2222, published to the Pennsylvania Bulletin on March 30, 2024. Word®-compatible copies will be circulated to the contact persons via electronic mail in accordance with the Commission’s Order posted on February 22, 2024, in this proceeding.

Sincerely,

/s/ Keven Brough

Keven Brough

Vice President Strategy & Market Development

Renew Home

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Dear Secretary Chiavetta,

Renew Home, LLC¹ (“Renew Home”) is pleased to offer comments on the Pennsylvania Public Utility Commission’s (“PA PUC” or “Commission”) Advance Notice of Proposed Rulemaking Order (“ANOPR”) to investigate the PUC’s role in the implementation of FERC Order 2222, published to the Pennsylvania Bulletin on March 30, 2024. We appreciate the opportunity to comment on this matter.

INTRODUCTION AND DESCRIPTION OF RENEW HOME

Renew Home launched in 2024 as the combination of OhmConnect and Google’s Nest Renew business line. Leveraging OhmConnect’s innovative home energy management platform alongside Google Nest’s leadership in energy products and services, Renew Home brings expertise from supporting Electric Distribution Company (“EDC”) programs and standalone market-integrated programs. Powering Renew Home is its capability to leverage technology to help households better manage their home energy usage. The goal of Renew Home is to help people be more efficient and save money while promoting a cleaner and more resilient grid for everyone.

SUMMARY OF RECOMMENDATIONS

Renew Home recommends that the PA PUC prioritize addressing the following topics as it determines the necessary stakeholder engagement and subsequent rules to enable Order 2222 participation:

¹ Renew Home, LLC is the parent company of OhmConnect, Inc. and Renew Home VPP, LLC. These comments are submitted by Renew Home, LLC on behalf of the company group, though relevant regulatory licenses, approvals, or permits may be held by a subsidiary.

1. The PA PUC should develop enrollment processes that can resolve participation conflicts so that customers are always provided the opportunity to participate in a demand response program while retaining customer choice.
2. The PA PUC should develop consistent rules around customer data access that will enable households to share with aggregators the data needed to participate and settle in PJM's market under timelines that will permit standard aggregator business operations.
3. The PA PUC should define the appropriate level of control over a DER Aggregation Resource (DERA) or Component DER that meets the PJM override requirement while maintaining customer and aggregator protections.

We expand on these recommendations in our responses to the specific PA PUC questions below.

RESPONSE TO PA PUC QUESTIONS

How will Component DERs previously not subjected to interconnection (energy efficiency and demand response resources) be integrated into an aggregation?

Renew Home respectfully contends that no additional interconnection-related PA PUC action is needed to enable energy efficiency and demand response resources to participate in PJM's markets as a Component DER. PJM through its tariff sets participation rules that to our understanding does not require additional interconnection beyond existing rules.

Under what conditions will direct control vs. monitoring be required?

Renew Home believes that the threshold question to address are the rules that will govern the appropriate level of control an EDC will retain over a DER Aggregation Resource (DERA) or Component DER. An examination of these rules is necessary due to the proposed PJM tariff which states that “[d]uring the Operating Day, a distribution utility may exercise its ability to override the physical operation of a DER Aggregation Resource or individual Component DER within a DER Aggregation Resource, when necessary to maintain safe and reliable operations on the distribution system.” We believe that the PA PUC should help define through a stakeholder-driven process:

1. What an ability to override means;
2. How an EDC will determine that safety and reliability to the distribution system is at risk;
and

3. How this will be balanced with device manufacturer operational requirements, customer choice, and privacy/security requirements.

Following this detailed examination of override functionality, the PA PUC will be more easily able to address whether override should include direct control.

How should the DER aggregation review process differ for different use cases, market services, DER compositions or grid conditions?

The DER aggregation review process should not discriminate between use cases or DER compositions, especially by prioritizing certain classes of customers and their Component DERs over others.

We also suggest that the PA PUC setup DER aggregation review processes that emphasize speed of review. Especially across mass market customers, DER aggregations have the potential to change frequently as customers enroll, disenroll, and/or move.

The PUC seeks comment on whether its existing metering regulations for customer-generators, 52 Pa. Code § 75.14 (relating to meters and metering), can be adapted to facilitate provision of metering and telemetry data by DERAs to public utilities, consistent with Order 2222 and PJM's DAPM, and if so, whether and what specific changes to the PUC's interconnection regulations that facilitate this adaptation.

Renew Home respectfully suggests to the PA PUC that as it considers rules for data sharing from DERAs to EDCs it similarly addresses the data sharing rules from EDCs to DERAs. As the Commission summarizes “[a] DERA must provide to PJM all individual Component DER meter data necessary to facilitate the settlement of the DERA’s DER Aggregation Resource.”² Unanswered questions include the technical processes to collect and share the authorized information between the EDC and the utility, the rules governing that data exchange, and the appropriate data privacy considerations. For example, we believe the PA PUC should examine what meter data is needed to satisfy both PJM requirements and aggregator business processes, and under what time horizon. Along with this examination, the PA PUC could further explore the current process for sharing meter data with customer-authorized third parties, and whether the practical experience differs for aggregators for primarily mass-market customers.

A record was started to be built in Docket No. M-2021-3029018 regarding data access rules. In that docket, the PA PUC ultimately ruled that “Any EDC can voluntarily file a limited non EGS third-party data access tariff and, upon Commission approval of that tariff, can grant non EGS third

² ANOPR, p. 23

parties' access to its data systems under the conditions established in the approved tariff.”³ We believe that the Commission should examine whether the voluntary condition is sufficient given the increasing expectation that consumers be able to take advantage of market participation enabled by Order 2222.

The PUC seeks comment on whether its existing application process for net metering customer-generators, 52 Pa. Code § 75.17, or its existing dispute resolution regulations, 52 Pa. Code Chapters 1 (relating to rules of administrative practice and procedure), 3 (relating to special provisions) and 5 (relating to formal proceedings), or both, can or should be adapted to facilitate adjudication of disputes about DERA registration of its Component DERs with PJM, consistent with Order 2222 and PJM's DAPM, and if so, the specific changes to the PUC's regulations that would facilitate this adaption.

Renew Home believes that rules are needed to manage dual enrollment conflicts, but that these rules should not trigger a formal dispute resolution process. Requiring dispute resolution for every enrollment dispute, especially for mass market customers, will create an overly burdensome administrative overhead both for the aggregators and the PA PUC.

We believe that the PA PUC should consider how to resolve any potential disputes due to enrollment in multiple conflicting programs at the same time that the customer is authorizing the EDC to provide data to the aggregator. Our experience from running programs for mass market customers is that if these potential disputes are not resolved at the time the customer is taking action, it creates unintended delays and risks the customer losing interest in providing demand flexibility.

The PUC seeks comment on whether and how its regulations can or should be augmented to address EDC overrides of DER Aggregation Resource or Component DER operation, consistent with Order 2222 and PJM's DAPM, and, if so, the specific changes to the PUC's regulations that would address overrides.

As Renew Home stated above, we believe the Commission would benefit from a stakeholder process that defines the situations when an EDC override would potentially occur, and the mechanism (whether it is physical or signaled to the aggregator) that would enact the override. As a general principal, Renew Home suggests that the highest priority should be to minimize any customer impact during an override event.

How should the PUC ensure that processes are in place for efficient data exchange among and between Component DERs, DERAs and EDCs for customer authorizations?

³ See July 3, 2023 Secretarial Letter, at p. 2, available at <https://www.puc.pa.gov/pcdocs/1790956.pdf>.

We echo our comments above that a critical first step by the Commission should be to re-examine whether Docket No. M-2021-3029018 should be re-opened to set data exchange rules in service of Order 2222 requirements. A working group as part of that docket could expediently identify the key data sharing issues to be explored further.

Final comments.

To prepare for Order No. 2222, Renew Home believes that the PA PUC should prioritize rules around customer enrollment processes, dispute resolution, data access, and permissible override provisions in advance of the 2026 proposed implementation deadline in order for aggregators to fully participate in the PJM markets.

The best practice for reducing friction experienced by customers seeking to participate in an aggregator's program is to resolve all interplays necessary between the EDC and the third-party aggregator in one flow. Within this single flow, a customer could provide – through an PA PUC-approved process – various authorizations, including:

1. **Authorization to provide EDC-specific customer information.** With the customer's consent, EDCs could provide aggregators with EDC account number, Zone, customer address, and any other static piece of information needed to enroll the customer in a DERA in order to minimize enrollment delays.
2. **Authorization to provide ongoing meter data sharing.** Although mass market customers are permitted to be settled by aggregators using aggregated meter data (rather than individual Component DER data), the meter data is still necessary for market participation.
3. **Confirmation of program enrollment to resolve potential disputes.** The EDC will have insight as to whether the customer is already enrolled in a conflicting EDC-administered program. We believe that to minimize customer friction customers should be presented with information about this conflict, and have the opportunity for resolution by either remaining in the EDC program or requesting to disenroll from the EDC program in favor of the aggregator program.

CONCLUSION

Renew Home greatly appreciates consideration of its comments and looks forward to continued engagement on this important topic of Order 2222 implementation in Pennsylvania.

Sincerely,

/s/ Keven Brough

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Vice President Strategy & Market Development

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