

April 22, 2024

Sherri L. Golden, RMC
Secretary of the Board
New Jersey Board of Public Utilities
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**RE: IN THE MATTER OF NEW JERSEY'S DISTRIBUTED ENERGY RESOURCE
PARTICIPATION IN REGIONAL WHOLESALE ELECTRICITY MARKETS (BPU
Docket No. EO24020116)**

Dear Secretary Golden,

Renew Home, LLC (“Renew Home”) appreciates the opportunity to provide comments on the New Jersey Board of Public Utilities’ (“NJBPU” or “Board”) Federal Energy Regulatory Commission (“FERC”) Order No. 2222 Request for Information (“Order No. 2222 RFI” or “RFI”), issued on March 7, 2024.

INTRODUCTION AND DESCRIPTION OF RENEW HOME

Renew Home launched in 2024 as the combination of OhmConnect and Google Nest’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 NJBPU consider the following topics as it determines the necessary stakeholder engagement and subsequent rules to enable Order 2222 participation:

1. The NJBPU 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 NJBPU 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 NJBPU 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 NJBPU questions below.

RESPONSE TO NJBPU QUESTIONS

13. Do you have any comments or concerns about the classification of certain resources and their operating profiles as eligible for DERAs? Please state any associated control and/or compensation concerns.

Renew Home does not have any comment at this time. Our understanding of PJM's Order 2222 Compliance Filings is that mass market customers will be treated as Component DERs, meaning that a household with smart home technology is permitted participation in PJM's markets under the new market rules.

14. Do you believe that it is technically feasible to implement Order No. 2222 requirements by PJM's originally proposed 2026 implementation deadline? If not, please explain in detail why not. Are there any actions that PJM or NJBPU could take to make the implementation more efficient and timely?

In short, aggregators are technically ready and the underlying technology to control load is actively being deployed. The DER industry/community has been deploying hardware solutions and software solutions for decades in the form of "smart" technology such as smart thermostats, and more recently EV chargers, smart water heaters, and smart plugs (to name a few). Alongside this smart technology is the ability to control or delegate control of these devices through wi-fi or cellular connectivity, enabling participation historically in demand response and now advanced grid flexibility.

To prepare for Order No. 2222, Renew Home believes that the NJBPU will need to develop 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 NJBPU-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.

Beyond a single flow for authorizations, there is also a critical set of questions to address around 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 NJBPU 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 NJBPU could further explore the current process for sharing meter data with authorized third-parties, and whether the practical experience differs for aggregators for primarily mass-market customers.

15. Do you have any comments or questions about dispute resolution processes between DERAs and utilities?

As stated above, we believe that the NJBPU 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.

16. How should DER Aggregator performance be monitored/tracked/reported to the public?

Renew Home firmly believes that it is important for DER Aggregators to manage aggregations and resources in a way that conforms to PJM rules and capacity and dispatch expectations. However, we also generally believe that public reporting of performance is duplicative of the information that will already be available to PJM, and if required must not violate customer privacy expectations or rules.

17. Should each EDC be required to formally establish pilot programs demonstrating their procedures and performance for DERA integration? Should these pilots be identical/consistent/unique across EDCs?

Renew Home has no comment at this time.

18. As part of NJBPU's efforts to help implement Order No. 2222 how much technical support from the NJBPU, separate from NJBPU's current Grid Modernization Forum working groups, is desired? Would a statewide stakeholder engagement process, working group, technical conference, or public platform for stakeholder engagement be beneficial?

Renew Home believes that the NJBPU should address the policy around customer authorization / dispute resolution (and whether this should exist in a single customer flow) through one stakeholder engagement process or working group. The NJBPU should then address in a separate stakeholder engagement process or working group the policy questions of what customer data should be provided by the EDC to the authorized aggregator, and under what time horizon. Finally, we recommend a series of technical conferences followed by a working group to develop guidance around the technical processes necessary to facilitate data access and data transfer between EDCs and authorized aggregators, leveraging industry standards and best practices.

19. Are there any specific questions that you have for NJBPU that has not been addressed yet in the FERC Order, PJM's Compliance Filings, or NJBPU's Order No. 2222 outreach efforts?

Renew Home believes the NJBPU should also address 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 NJBPU should help define through a stakeholder-driven process what an ability to override means, how an EDC will determine that safety and reliability to the distribution system is at risk, and how this will be balanced with device manufacturer operational requirements and privacy/security requirements.

20. Which of the following categories best describes the stakeholder perspective your comments provide?

DER aggregator

CONCLUSION

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

Sincerely,

/s/ Keven Brough

Keven Brough

Vice President Strategy & Market Development

Renew Home

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