-----Original Message-----

From: Pearson, John, E - ISO New England Inc.

Sent: Tuesday, November 9, 2021 10:53 AM

Subject: RE: [EXT] Re-sending with Corrected Link - NAESB WEQ Business Practices Subcommittee Informal Comment Period - Ending November 9, 2021

Hi Caroline,

These are the comments of ISO New England to address 2021 WEQ Annual Plan Items 7.a and 7.b use case identifying data elements that may be needed in the registration of a Distributed Energy Resource (DER) aggregation and/or an individual resource comprising a DER aggregation

ISO New England notes that the NAESB use case describes more information than it requires for FERC Order 2222 participation. Additionally ISO may collect different information than shown in the use case. This link accesses the most recent versions of ISO New England Tariff changes to comply with FERC Order 2222: https://www.iso-ne.com/static-assets/documents/2021/11/a08a\_mc\_2021\_11\_09\_10\_order\_2222\_iso\_tariff\_redlines.zip

In the first document - which contains Sections 1-12 and 14 of Market Rule 1 - the bulk of the DER/DERA requirements are found in Section III.6 (starting on page 98 of the document). The DER/DERA registration requirements are found in Section III.6.7 (starting on page 102 of the document).

In the second document - which contains Section 13 of Market Rule 1, which addresses the Forward Capacity Market - the bulk of the requirements for DER/DERAs seeking to be a capacity resource [i.e., a Distributed Energy Capacity Resource (DECR)] are found in Section III.13.1.4A (starting on page 71 of the document). The information requirements for new DECRs are found in Section III.13.1.4A.1.1 (starting on page 72 of the document).

Because new DECRs could be resources that do not currently exist given that the Forward Capacity Market procures resources on a 3-year forward basis, information being collected to qualify and clear a DECR is more of a planning nature - e.g., the DRR Aggregation Zone, Load Zone and Dispatch Zone within which the resource will be located; a description of the project and its expected configuration, including the types of generation and demand response comprising the project; etc. We do not require things like retail billing account numbers of the DERs comprising the resource at this stage - however, when actual DERs/DERAs are registered to fulfil a DECR's Capacity Supply Obligation for a Capacity Commitment Period, Section III.6.7 would require that retail billing account numbers be provided.

Thanks,

John

John Pearson

Technical Manager, Reliability and Operations Compliance ISO New England, 413-540-4260

ISO New England Inc.

One Sullivan Road | Holyoke, MA 01040-2841 Web | ISO Express | News | Twitter | App