Voltus Comments to NAESB

Voltus appreciates NAESB’s efforts to develop standardardized minimum informational requirements for registering Distributed Energy Resources and DER Aggregations. It is important, however, to ensure that the NAESB standards do not burden aggregators or erect unnecessary barriers to participation. This is particularly true since the NAESB process is an expensive, member-only process that occurs outside of the public ISO and RTO stakeholder discussion. As a result there is a risk that NAESB’s proposed standards would not be aligned with the information the RTOs and ISOs are seeking, and could be a backdoor to developing burdensome registration requirements that would inhibit DER aggregations.

Voltus has reviewed the proposed NAESB DERA and DER registration standards, and compared them to the information required to register resources in two of the markets in which it operates (MISO and NYISO). In general the proposed standards look unduly burdensome.

First, the proposed standards request far too much information to be a “minimum standard.” Much of this information is not readily available to aggregators or customers. Aggregators also do not have access to information, proprietary to the LSEs or transmission providers (e.g., interconnection data, pricing node identity).  Aggregators are also not familiar with the pseudo-ties or dynamic schedules in a balancing area. If utilities were obligated to provide this information, it could burden them and delay the registration process.

Certain information about the DER aggregation is excessive because it is unnecessary or duplicative of information that would be provided to participate in a specific program. Examples include operational characteristics of the aggregation; response time, maximum run time, and minimum run time. Requiring this type of information could be confusing in some markets, because this information is set by the participation rules or offer parameters. The response time for 10 minute reserve products would be 10 minutes, while 30 minute reserve products would be 30. In some markets, like ISO-NE, the different operational characteristics of an individual DER could be registered in different aggregations.

Other information is very detailed and there should be a strong justification for recommending it as a minimum informational requirement. Such information include, whether the resource is Dispatchable energy resource; Ability to reverse direction (supply vs. demand switching); Voltage control (yes/no; volt-r); Frequency control; Inertial control; Feeder voltage; Feeder impedance – distribution system equivalent feeder impedance; Reactive support. This information is not required in MISO or NYISO now, and it is not clear how one determines feeder voltage for an aggregation that might cover the entire territory of an electric distribution company (e.g., PJM ancillary services).

When it comes to *individual DERs,* the minimum informational requirements are so oppressive as to eliminate many DERs from the market entirely. For example, a retail customer seeking to register a hot water heater or smart thermostat will not know their substation, feeder, or phase information. Even the customer’s account number would be a significant barrier: a report by Energy Hub found that requiring customer utility account information decreased enrollment by 84% and that requiring customers to complete a Customer Information Standardized Request form resulted in a further 39% decrease in customer enrollment applications.[[1]](#footnote-0) As a minimum standard, the proposed NAESB DER and DER aggregation registration requirements should enable participation of the smallest DERs. Since the aggregator will manage the DER aggregations, the information requested for individual DERs should be minimal.

Voltus has made specific comments in the list of proposed information. The proposed informational requirements for both aggregations and individual DERs should be mapped compared to the current information required when registering a resource in one of the FERC-jurisdictional RTOs or ISOs. Any information requested should be shown to be not unduly burdensome.

1. EnergyHub, *Optimizing the demand response enrollment process: Best practices for customer enrollment and a seamless customer experience*, at 3, 2021, [https://info.energyhub.com/optimizing-demand-response-enrollment](https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Finfo.energyhub.com%2Foptimizing-demand-response-enrollment&data=04%7C01%7Ctamara.d%40ecobee.com%7Ccf009cad1e9b4669f11f08d982bda56e%7C487e3dd07f654a9bbf912970cfa93390%7C0%7C0%7C637684573315420511%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=d4%2Fg2kHUw%2FWpql30haPb70vuFZrDgUhPOduf2F5l3HI%3D&reserved=0). [↑](#footnote-ref-0)