ERCOT sent out an email on April 15, 2015 to the ETWG exploder requesting comments be sent to ERCOT by COB May 15, 2015. That same email was forwarded to the TAC, ROS and WMS exploders on May 7th.

COMMENTS RECEIVED BY ERCOT (as of 5/21/2015):

Comment #1:

Are DER prohibited from "DER heavy";  I know as long as they are less than 10 MW they don't have to, but can a 3 MW generator register as a model generator?

Comment #2:

I believe we are overlooking an area that needs addressing somewhere in our distributed generation rules.  I'm not sure if it belongs under this subject.

When we think of DG, we typically envision the rooftop or ground based systems behind retail meters.  However, also considered DG are systems behind a municipal or COOP master meter directly tied to the distribution lines or tied on the distribution side of a substation, as an example.

My suggestion is that since these systems are more closely related to the larger scale systems found tied to the transmission side, these systems should fall under the 10MW minimum for ERCOT registration (as opposed to the 1 MW rule currently in place).  A second point, and this is important for opening up relief for COOPs and distribution companies that are not allowed to own generation assets (or are prohibited to generate based on supply agreements);  these DG systems (to include energy storage), should be considered as load reduction assets.  In the oil shale areas, the demand loads are exceeding distribution system capacity.  Solar with energy  storage, for example, tied directly to a distribution circuits could help resolve this problem.

Comment #3:

This is so high level that is difficult to question/comment. Only one I have is to define "near real time" (Is it a defined term in the ERCOT lingo? Or just a casual terminology that yet needs a definition?)