Re: BESTF Materials for Nov. 15th Meeting (comments due Nov. 11)

From: Danny Musher [danny.musher@keycaptureenergy.com](mailto:danny.musher@keycaptureenergy.com)

* KTC 1 - Energy Storage Resource (ESR) Registration
  + KCE has no comment at this time.
* KTC 3 - Charging Restrictions During Emergency Conditions
  + KCE agrees with the discussion at the meeting that price signals alone should disincentivize charging during emergency conditions.  However, there could be unique instances in which ESRs may need to charge during such EEA conditions; for example, an FFR resource that must restore its charge following a deployment (assuming frequency has recovered to levels at which FFR resources are permitted to recharge.)  Due to such scenarios, KCE questions whether an outright prohibition on charging during emergency conditions is needed at this time.  If ERCOT determines a prohibition is indeed needed at this time, KCE prefers a financial penalty for such activity and not a penalty that would result in a loss of qualification to participate in markets.
* KTC 5 - Single Model Energy Storage Resource Energy Deployment Performance (ESREDP)
  + KCE supports the implementation of ESREDP.  The current process of scoring GREDP and CLREDP separately for ESR results in scores that do not reflect the performance of ESR resources.  The new ESREDP calculation should provide a more accurate representation of ESR performance and allow ESRs to offer products that require shifting from charging to discharging (e.g. Frequency Regulation) while meeting performance targets.
* KTC 6 - Single Model ESR Framework Description
  + KCE has no comment at this time.
* KTC 7 - Settlements for ESRs
  + KCE supports the updated Base Point Deviation (BPD) settlement process, which is an improvement over the current process of calculating BPD separately for the GR and CLR components.  KCE has no comment on the other proposed settlement changes at this time.