* **Key Topic/Concept (KTC) 03:  ESR Dispatch, Pricing and Mitigation**
  + KCE believes that economic dispatch of ESRs for both charging (Bid-to-Buy) and discharging (Offer-to-Sell) is consistent with best industry practice and places ESRs on an equal footing with other resources in the market.
  + As a result, KCE supports ERCOT's proposals that:
    - ESRs be settled based on nodal pricing whether discharging or charging.
    - ESRs be dispatched by SCED for charging and discharging.
    - ESRs be dispatched by SCED on its nodal shift factor.
    - The Mitigated Offer Cap for ESRs be set at the SWCAP.
* **Key Topic/Concept (KTC) 04:  Technical Requirements**
  + KCE does not support testing requirements such as Lagging Test 2 that appear to preclude ESRs with duration less than 1 hour.  Testing requirements should allow for 15-minute duration batteries.
  + As a general principle, KCE believes ESRs should not need to go beyond existing general minimum requirements unless they are paid to do so (or such requirements are extended to all other Generators.)  For example, FRT/VRT requirements appear to set minimum requirements for ESRs beyond those of other Generators.
* **Key Topic/Concept (KTC) 06:  ESR Options to Maintain Desired Level of State of Charge**
  + KCE supports allowing submission of Energy Offer Curves (EOC) for ESRs during the Operating Hour as soon as possible.  Given ESRs' uniquely high ramping capabilities, EOC submission closer to Real-Time will enable ESRs to provide greater value to ERCOT through a more precise response to market price signals.  As an intermediate measure, KCE supports ERCOT's proposal that the EOC submission window for Limited Duration Resources should be expanded to end just prior to the Operating Hour.
* **KCE has no comments on KTC 02 or KTC 10 at this time.**