Re: BESTF Materials for Dec. 6th Meeting (comments due Dec. 2)

From: Danny Musher <danny.musher@keycaptureenergy.com>

With respect to the KTCs circulated following the November 15th BESTF meeting, we have one comment regarding "KTC 3 - ESR Dispatch, Pricing and Mitigation; and Charging Restrictions During Emergency Conditions."  KTC 3 states that "ESRs shall suspend charging unless instructed otherwise by ERCOT. Such instructions may be in the form of, but not limited to SCED Base Points, Load Frequency Control deployment or manual Dispatch including Verbal Dispatch Instruction."  We support this language, but we also agree with comments made at the meeting that telemetered notification of EEAs is highly desirable in addition to the various forms of dispatch instructions listed in the KTC.  Telemetered notification of EEAs would allow KCE to program automatic responses into our controls rather than relying on other responses, including manual overrides.  Per the conversation at the meeting, KCE's understanding is that this input does not necessarily need to be included in the KTC at this juncture, but instead could be considered as part of the NPRR language discussion next year.  Please advise if this understanding is not correct; if so, we would support red-lined changes to the KTC to specify that telemetered notification of EEAs will be considered as part of the NPRR development.

KCE has no comments at this time on the remainder of the KTCs from the November 15th meeting.