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| NPRR Number | [1014](http://www.ercot.com/mktrules/issues/NPRR1014) | NPRR Title | BESTF-4 Energy Storage Resource Single Model |
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| Date | | October 8, 2020 | |
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| Submitter’s Information | | | |
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| Cell Number | |  | |
| Market Segment | | Not Applicable | |

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| Comments |

Texas Advanced Energy Business Alliance (TAEBA) appreciates the opportunity to provide input on Nodal Protocol Revision Request (NPRR) 1014. In particular, these comments focus on publication of state of charge (“SOC”) information for Energy Storage Resources (ESRs) in the 60-Day SCED Disclosure Reports, the single issue in NPRR1014 that did not achieve consuesus as part of the Battery Energy Storage Task Force (BESTF) discussions. TAEBA agrees with the comments submitted October 8, 2020 by Jupiter Power, Key Capture Energy, Viridity Energy, Glidepath Power Solutions, Enel North America, and Able Grid Energy Solutions (“Joint Commenters”) that individual ESR SOC information should not be published, and finds Joint Commenters’ alternate suggestion of publishing ERCOT-wide aggregate SOC information to be a reasonable compromise.

TAEBA represents local and national advanced energy companies seeking to make Texas’s energy system more secure, clean, reliable and affordable. “Advanced energy” encompasses a broad range of products and services that constitute the best available technologies for meeting energy needs today and tomorrow. Among these are energy efficiency, energy storage, demand response, natural gas electric generation, solar, wind, hydro, nuclear, electric vehicles, biofuels and smart grid. TAEBA’s membership includes multiple companies seeking to build and operate energy storage facilities in the ERCOT market.

TAEBA agrees with Joint Commenters that publication of indivividual ESR telemetered SOC data in 60-day SCED Disclosure Reports is problematic and should not be required. As Joint Commenters point out, publication of SOC data from individual ESRs, in combination with other data included in the 60-Day SCED Disclosure Reports, could result in other Market Participants gaining insight into commercially-sensitive information. SOC management is central to the business strategy of ESR owners and operators, and publication of telemetered SOC data, alongside other data in the 60-Day report, would allow other Market Participants to learn commercially-sensitive information about ESR capabilities and market participation.

To be clear, TAEBA does not oppose the data disclosure requirements for ESRs generally; rather, TAEBA opposes the requirement that individual ESRs be required to provide additional data not required of other Generation Resources and Load Resources that would expose commercially-sensitive information.

TAEBA further recognizes that some Market Participants view SOC information as an important dataset to improve market operations as ESR participation in the markets grows. The alternate proposal offered by Joint Commenters would allow for publication of ERCOT-wide aggregated SOC rather than individual ESR telemetered SOC. TAEBA believes that this approach appropriately balances the concerns that ESR owners and operators have expressed with the goal of increasing transparency and improving market operations and reliability outcomes.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None