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| OBDRR Number | [041](https://www.ercot.com/mktrules/issues/OBDRR041) | OBDRR Title | Updates to Requirements for Aggregate Load Participation in the ERCOT Markets |
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| Date | July 8, 2022 |
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| Submitter’s Information |
| Name | Ignacio Guajardo |
| E-mail Address | iguajardo@texasadvancedenergy.org |
| Company | Texas Advanced Energy Business Alliance (TAEBA) |
| Phone Number | 956.285.4974 |
| Cell Number | 202.380.1950 ext 3031 |
| Market Segment | Not applicable |

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| Comments |

Texas Advanced Energy Business Alliance (TAEBA) hereby submits these comments on Other Binding Document Revision Request (OBDRR) 041, which was submitted by Tesla to modify Aggregate Load Resource (ALR) requirements. TAEBA includes local and national advanced energy companies seeking to make Texas’s energy system secure, clean, reliable, and affordable. Advanced energy technologies include energy efficiency, energy storage, demand response, solar, wind, hydro, nuclear, and electric vehicles (EVs). Used together, these technologies and services will create and maintain a higher performing energy system — one that is reliable and resilient, diverse and cost effective — while also improving the availability and quality of customer facing services. TAEBA’s membership also includes advanced energy buyers, representing the interests of large electricity consumers interested in increasing their purchases of advanced energy to meet clean energy and sustainability goals.

TAEBA supports allowing aggregations of distributed energy Resources (“DERs”) to fully participate in wholesale energy and Ancillary Service markets. DERs are smaller, more flexible technologies or systems installed on the distribution system or behind a customer meter, including energy efficiency measures, distributed generation such as solar, battery storage, demand response, and electric vehicles and their charging equipment. OBDRR041 would provide an immediate opportunity to increase DER participation in ERCOT markets and support electric reliability in Texas. OBDRR041 would not facilitate full participation by DERs in ERCOT markets, but it is readily implementable and would provide opportunities for learning that would inform future efforts on DER participation. TAEBA also recognizes that OBDRR041 is intended as an interim measure, and that more action is needed to fully realize the benefits of DERs to strengthen the reliability and resiliency of the Texas grid, as discussed in TAEBA’s June 2022 report titled “Future Proofing the Texas Grid with Distributed Energy Resources.”[[1]](#footnote-2) There is enormous potential for DERs at all scales, including residential, corporate, and industrial sites. With DERs coming online, optimizing these resources as soon as possible will ensure reliability and cost-effectiveness.

TAEBA supports ERCOT’s proposal from its June 17, 2022 comments on OBDRR041 to create a new participation model to aggregate distribution-connected generators and batteries for participation in the wholesale energy and Ancillary Service markets. TAEBA also supports the proposal offered during the June 16, 2022 Public Utility Commission of Texas (PUCT) Open Meeting outlining a pilot program to test aggregations of distribution-connected load, generation, and energy storage systems. TAEBA views the pilot program as an opportunity to provide testing of aggregations while further revisions are being considered. Solutions to expand DER access to ERCOT markets should consider all DER technologies and business models and address the numerous sites where they can participate. TAEBA looks forward to engaging with ERCOT, the PUCT, and stakeholders to advance participation by aggregated DERs in ERCOT markets.

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| Revised Cover Page Language |

None.

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| Revised Proposed Other Binding Document Language |

None.

1. TAEBA, “Future Proofing the Texas Grid with Distributed Energy Resources.” June 2022. [↑](#footnote-ref-2)