|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| NPRR Number | [1171](https://www.ercot.com/mktrules/issues/NPRR1171) | | NPRR Title | | Requirements for DGRs and DESRs on Circuits Subject to Load Shedding |
|  | | | | | |
| Date | | May 9, 2023 | | | |
|  | | | | | |
| Submitter’s Information | | | | | |
| Name | | | | Arushi Sharma Frank / Greg Thurnher | |
| E-mail Address | | | | [asharmafrank@tesla.com](mailto:asharmafrank@tesla.com) / [gthurnher@tesla.com](mailto:gthurnher@tesla.com) | |
| Company | | | | Tesla Energy Operations, Inc. d/b/a Tesla | |
| Phone Number | | | |  | |
| Cell Number | | | | 512-593-9424 | |
| Market Segment | | | | Independent Generator | |
|  | | | |  | |
| **Comments** | | | | | |

Comment Summary

* The ERCOT Protocols should confirm that the limitations to Distribution Generation Resources (DGRs) / Distribution Energy Storage Resources (DESRs) currently prescribed in Section 3.8.6,Distribution Generation Resources (DGRs) and Distribution Energy Storage Resources (DESRs), and any edits made to this section or other sections of the Protocols, do not apply to "Aggregated Distributed Energy Resources[[1]](#footnote-1)” (ADERs).
* ADERs should have a different approach to Ancillary Services participation than single Resources connected at a single Point of Interconnection (POI) on a distribution circuit. When the ADER pilot is codified in ERCOT protocols, the restrictions proposed in NPRR1171 should not influence future policies on ADERs. The ADER pilot will be fertile ground to quickly gather information on the capabilities of highly distributed resources to carry Regulation Service and responsive service even when accounting for unprotected circuits. The effect of anticipated or realized Load shed or unexpected emergency conditions will have a fractional impact on the availability of a highly distributed resource (ADER) for Ancillary Services, given the highly distributed physical interconnections that comprise an aggregation.
* ERCOT should consider the scope of NPRR1171. All providers of Ancillary Services should be constrained by limits derived from demonstrable reliability concerns. In many cases, there are unit specific caps or caps on technology types. Tesla encourages ERCOT and stakeholders to consider a risk-adjusted approach to limit distribution-connected resources from providing Ancillary Services during periods of high-risk of Load shed or distribution system Outages. For example, ERCOT and its stakeholders may consider expanding the Operating Condition Notice (OCN) process to limit Day-Ahead Ancillary Service Offers from distribution-connected resources.
* Tesla is confident that its end users will self-impose a risk adjusted bias to not participate in Ancillary Service markets during periods of high risk of distribution Outages. In many cases, consumers purchase people buy a home battery or a natural gas generator to provide resiliency for their family during an emergency. A consumers’ desire for resiliency and retaining state of charge during high risk periods limits participation in grid services. This bias will limit the need for more stringent, ISO imposed participation constraints.

**NPRR1171 Risk-Adjusted Participation Approach for DR/DESR**

Tesla believes that NPRR1171, which increases opportunities for DGR / DESRs on unprotected circuits to provide Regulation Down and Non-Spinning Reserve (Non-Spin), should be less restrictive.

Distribution connected resources should be allowed to provide all Ancillary Services based on a risk assessment. During periods of low risk of Load shed or distribution system interruptions, there should be no limitations on service provision. Load shed events are infrequent, and fully constraining resources from providing Ancillary Services year-round hinders competition without reliability improvement or merit. Tesla encourages ERCOT and stakeholders to consider a risk-adjusted approach to limit the way distribution-connected resources provide Ancillary Services during periods of high-risk of Load shed or distribution system Outages.

In the Winter of 2022/2023, ERCOT experienced two notable events where the distribution system was at heightened risk of Outages. Each event was preceded by an OCN up to 7 days in advance of the event. If ERCOT and stakeholders wish to limit the way Ancillary Services are provided during periods of high risk of distribution system Outages, then ERCOT and its stakeholders may consider expanding the OCN process to place limits Day-Ahead Ancillary Service offers from distribution connected resources.

Stakeholders may consider the following change to paragraph (3) of Section 3.16, Standards for Determining Ancillary Service Quantities, if they choose to apply this risk-adjusted constraint consistently to DGRs and DESRs:

The ERCOT Board shall review and approve ERCOT's methodology for determining the minimum Ancillary Service requirements, any minimum capacity required from SCED dispatchable Resources to provide Non-Spin, limitations on how Ancillary Services that can be provided by DGRs and DESRs that are interconnected to a distribution circuit that is subject to Load shed, the minimum capacity required from Resources providing Primary Frequency Response to provide RRS, the maximum amount of RRS that can be provided by Resources capable of FFR, and the maximum amount of Reg-Up and Reg-Down that can be provided by Resources providing FRRS-Up and FRRS-Down.

**Clear Exclusion of ADERs from NPRR1171**

An ADER is not a recognized resource type in ERCOT Protocols and is subject instead to governance by the ERCOT Board of Directors and the Public Utility Commission of Texas (PUCT) under PUCT Substantive Rules Section 25.361 (k), Pilot Projects.[[2]](#footnote-2) It is imperative that this Protocol Revision clarify the scope of its changes to clearly exclude their application to ADER, and by extension also clarify that ADER are excluded from the relevant sections of Protocols reviewed in this NPRR.

During the term of the ADER pilot, the ability of an ADER to provide Ancillary Services is governed by the terms of the ERCOT ADER Pilot Project. These terms are further bound by the direction provided by Commissioner Will McAdams and Commissioner Jimmy Glotfelty in the Guiding Principles memorandum filed for the ADER pilot. (July 13, 2022) The memo establishes the scope and objectives of the pilot project, including a goal to understand the impact of having Ancillary Services carried on the distribution system. Fundamentally, the pilot project’s overarching objective is to “answer questions related to how aggregated distributed generation can support reliability” and "enhance the wholesale market, incentivize investment, potentially reduce transmission and distribution investments, and support better load management during emergencies." [[3]](#footnote-3)

Given these clear objectives, which are further memorialized in the ERCOT Board- and PUCT-approved Governing Document, Tesla is devoting significant time and resources to ensuring the successful growth of the ADER pilot. Success, in this context, includes growing the pilot opportunities to include participation in high-value reliability services. This ensure ADERs receive a dependable market signal to innovate, and Load Serving Entities (LSEs) realize the value in ADER investments. Specifically, ADER participants will be motivated to develop aggregations as an Ancillary Service hedge where markets allow them to provide all services they are capable of providing from an ADER. Most importantly, a successful pilot will realize the value in this asset, and development will continue. Absent adequate, competitive opportunities to provide Ancillary Services on a level playing field, participation will likely cease at the end of the pilot. As the Vice Chair of the PUCT’s ADER Task Force, Tesla has expressed repeated concerns in public meetings of the task force that if the pilot does not expand to include Regulation Service and responsive service, only the largest and most sophisticated market participants will be able to participate. Even the most sophisticated providers in the market will be subjected to reduced reliability value, potentially stunting further innovation in the retail market and failing to deliver on the objectives of the pilot. The only service currently allowed in the ADER Pilot is Non-Spin, and duration limited resources are much more capable of delivering a higher-value service.

**Differentiated Risk Profile for ADERS Merits Alternative Risk-Reward Approach**

Tesla believes that all constraints on providers of Ancillary Services should be based upon demonstrable reliability concerns. Said another way, limiting the provision of Ancillary Services year-round to avoid distribution system interruptions is an undue burden.

ADERs face a decidedly different risk profile. For example, Tesla’s growing portfolio of ADERs connects to ERCOT by way of 176 different substations for about 10MW of capacity. This spans four Load Zones, comprising much of the geography of the ERCOT Transmission System. The geographic and electric diversity of this aggregated interconnection is far less likely to be unavailable under the circumstances that isolate a resource with a single distributed POI.

The availability profile of ADERs during periods of high risk of Outages on the distribution system is not known. The pilot exists to allow ADERs to demonstrate their capabilities under all circumstances. Tesla has observed and/or operated aggregations where individual device owners adopt a risk-tolerance that is aligned with ERCOT’s reliability concerns. Device owners prefer to retain their capacity for resiliency, rather than offer grid services, when the risk of separation from the distribution system is high. For example, during extreme weather events or high-risk distribution Outages, owners of Tesla stationary storage devices will likely operate in Storm Watch Mode. Storm watch mode conditions the battery for distribution Outages and removes the resource from grid service offerings. Retailers or LSEs for ADER population customers will be able to consider these decisions to improve forecasts of available capacity and design an approach to dispatch ADERs that reliably delivers Ancillary Services, if given the privilege demonstrate their capabilities. Outside of infrequent, anomalous events, we expect ADER participants to be capable of delivering all Ancillary Services, as demonstrated in our grid services programs in California and Australia.

To reiterate, when the pilot is codified in ERCOT protocols, the restrictions proposed in NPRR-1171 should not influence future policies on ADERs.

|  |
| --- |
| Revised Cover Page Language |

None

|  |
| --- |
| Revised Proposed Protocol Language |

***3.8.6 Distribution Generation Resources (DGRs) and Distribution Energy Storage Resources (DESRs)***

(1) As a condition for the interconnection of a DGR or DESR, the affected Resource Entity, after consultation with the relevant Distribution Service Provider (DSP), shall submit an executed Section 23, Form Q, Interconnection Circuit Designation for Distribution Generation Resources (DGRs) and Distribution Energy Storage Resources (DESRs).

(a) The DSP shall indicate that the interconnecting distribution circuit for the DGR or DESR is subject to Load shed if the DSP determines that the distribution circuit may be disconnected as part of an Energy Emergency Alert (EEA) Level 3 Load shedding event, an Under-Frequency Load Shed (UFLS) event, or an Under-Voltage Load Shed (UVLS) event,.

(b) The DSP shall indicate that the interconnecting distribution circuit for the DGR or DESR is not subject to Load shed if the DSP determines that the distribution circuit will not be disconnected for any Load shed purpose during any of the events listed in paragraph (a) above. This condition may be met where:

(i) A DGR or DESR is connected to a distribution circuit which the DSP has excluded from Load shedding events, which may include, but is not limited to, a distribution circuit that interconnects only DGRs or DESRs; or

(ii) A DGR or DESR is connected to a distribution circuit where a recloser or other sectionalizing device excludes the DGR or DESR from Load shedding events on the distribution circuit.

(c) If the DSP has indicated that the interconnecting distribution circuit may be subject to Load shed, the DGR or DESR may qualify to provide only the following Ancillary Services, subject to the limits established by ERCOT pursuant to Section 3.16, Standards for Determining Ancillary Service Quantities:

(i) Non-Spinning Reserve Service (Non-Spin); and

(ii) Regulation Down Service (Reg-Down).

(d) If the DSP has indicated that the interconnecting distribution circuit is not subject to Load shed, then the DGR or DESR shall not be subject to the Ancillary Service qualification limitations described in paragraph (c) above.

(e) The DSP shall identify on Section 23, Form Q, whether the DSP has identified any operational limitations for the DGR or DESR based on known system limitations and planning or operational studies, including studies performed in accordance with Planning Guide Section 5.4.2, Submission of Interconnection Agreement and TSP and/or DSP Studies and Technical Requirements. Temporary limitations, such as may occur during maintenance outage conditions, are not required to be reported on Section 23, Form Q.

(2) If a DSP at any time after the interconnection of a DGR or DESR determines that any circuit to which the DGR or DESR is interconnected will be subject to Load shed during any of the Load shedding events listed in paragraph (1)(a) above, or that a DGR or DESR will need to be electrically relocated to a circuit that will be subject to Load shed during these Load shedding events:

(a) The DSP shall promptly notify ERCOT and the designated contact for the DGR or DESR;

(b) The Resource Entity for the DGR or DESR shall promptly submit an updated Section 23, Form Q, to ERCOT and shall make a corresponding update to its Resource Registration data; and

(c) The Ancillary Service qualification limitations in paragraph (1)(c) above will apply to the DGR or DESR.

(3) If a DGR or DESR is interconnected to a circuit that is subject to Load shed and then either is relocated to a different circuit that is not subject to Load shed during any of the Load shed events listed in paragraph (1)(a) above or receives notification from the DSP that the DGR or DESR is no longer subject to Load shed during any of these events, the Resource Entity for the DGR or DESR shall submit an updated Section 23, Form Q, to ERCOT and shall make a corresponding update to its Resource Registration data.(4) For a proposed conversion of an existing Settlement Only Distribution Generator (SODG) to a DGR or DESR, the Resource Entity will follow the generation interconnection process outlined in Planning Guide Section 5, Generator Interconnection or Modification.

|  |
| --- |
| ***[NPRR995: Replace paragraph (4) above with the following upon system implementation:]***  (4) For a proposed conversion of an existing Settlement Only Distribution Generator (SODG) to a DGR or for a proposed conversion of an existing Settlement Only Distribution Energy Storage System (SODESS) to a DESR, the Resource Entity will follow the generation interconnection process outlined in Planning Guide Section 5, Generator Interconnection or Modification. |

(3) The Resource Node for a DGR or DESR shall be fixed at a single Electrical Bus in the ERCOT Network Operations Model.

(a) If a DSP determines that a topology change has altered, or is expected to alter, the electrical path connecting the DGR or DESR to the ERCOT Transmission Grid for a period longer than 60 days:

(i) The DSP shall promptly notify the interconnecting Transmission Service Provider (TSP) and the designated contact for the DGR or DESR, and the interconnecting TSP shall notify ERCOT; and

(ii) The Resource Entity shall submit a change request to ERCOT via the Resource Registration process.

(4) This subsection applies solely to DGRs and DESRs.

3.16 Standards for Determining Ancillary Service Quantities

(1) ERCOT shall comply with the requirements for determining Ancillary Service quantities as specified in these Protocols and the ERCOT Operating Guides.

(2) ERCOT shall, at least annually, determine with supporting data, the methodology for determining the quantity requirements for each Ancillary Service needed for reliability, including:

|  |
| --- |
| ***[NPRR863: Insert item (a) below upon system implementation and renumber accordingly:]***  (a) The percentage or MW limit of ERCOT Contingency Reserve Service (ECRS) allowed from Load Resources providing ECRS; |

(a) The maximum amount (MW) of Responsive Reserve (RRS) that can be provided by Resources capable of Fast Frequency Response (FFR);

|  |
| --- |
| ***[NPRR1128: Replace item (a) above with the following upon system implementation:]***  (a) The maximum amount (MW) of Responsive Reserve (RRS) that can be provided by Resources capable of Fast Frequency Response (FFR) and specify the Operating Hours where prioritizing procurement of FFR up to the maximum FFR amount is beneficial in improving reliability; |

(b) The maximum amount (MW) of Regulation Up Service (Reg-Up) that can be provided by Resources providing Fast Responding Regulation Up Service (FRRS-Up); and

(c) The maximum amount (MW) of Regulation Down Service (Reg-Down) that can be provided by Resources providing Fast Responding Regulation Down Service (FRRS-Down).

|  |
| --- |
| ***[NPRR1007: Delete items (b) and (c) above upon system implementation of the Real-Time Co-Optimization (RTC) project and renumber accordingly.]*** |

(d) The minimum capacity required from Resources providing RRS using Primary Frequency Response shall not be less than 1,150 MW.

(3) The ERCOT Board shall review and approve ERCOT's methodology for determining the minimum Ancillary Service requirements, any minimum capacity required from SCED dispatchable Resources to provide Non-Spin, the maximum amount of Non-Spin that can be provided by DGRs and DESRs that are interconnected to a distribution circuit that is subject to Load shed, the minimum capacity required from Resources providing Primary Frequency Response to provide RRS, the maximum amount of RRS that can be provided by Resources capable of FFR, and the maximum amount of Reg-Up and Reg-Down that can be provided by Resources providing FRRS-Up and FRRS-Down.

|  |
| --- |
| ***[NPRR1007 and NPRR1128: Replace applicable portions of paragraph (3) above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project for NPRR1007; or upon system implementation for NPRR1128:]***  (3) The ERCOT Board shall review and approve ERCOT's methodology for determining the minimum Ancillary Service requirements, any minimum capacity required from SCED dispatchable Resources to provide Non-Spin, the maximum amount of Non-Spin that can be provided by DGRs and DESRs that are interconnected to a distribution circuit that is subject to Load shed, the minimum capacity required from Resources providing Primary Frequency Response to provide RRS, the maximum amount of RRS that can be provided by Resources capable of FFR, and the Operating Hours where prioritizing procurement of FFR up to the maximum FFR amount is beneficial in improving reliability. |

(4) If ERCOT determines a need for additional Ancillary Service Resources under these Protocols or the ERCOT Operating Guides, after an Ancillary Service Plan for a specified day has been posted, ERCOT shall inform the market by posting notice on the ERCOT website, of ERCOT’s intent to procure additional Ancillary Service Resources under Section 6.4.9.2, Supplemental Ancillary Services Market. ERCOT shall post the reliability reason for the increase in service requirements.

|  |
| --- |
| ***[NPRR1007: Delete paragraph (4) above upon system implementation of the Real-Time Co-Optimization (RTC) project and renumber accordingly.]*** |

(5) Monthly, ERCOT shall determine and post on the Market Information System (MIS) Secure Area a minimum capacity required from Resources providing RRS using Primary Frequency Response. The remaining capacity required for RRS may be supplied by all Resources qualified to provide RRS, provided that RRS from Load Resources on high-set under-frequency relays and Resources providing FFR shall be limited to 60% of the total ERCOT RRS requirement. ERCOT may increase the minimum capacity required from Resources providing RRS using Primary Frequency Response if it believes that the current posted quantity will have a negative impact on reliability or if it would require additional Regulation Service to be deployed.

|  |
| --- |
| ***[NPRR1128: Replace paragraph (5) above with the following upon system implementation:]***  (5) Monthly, ERCOT shall determine and post on the Market Information System (MIS) Secure Area a minimum capacity required from Resources providing RRS using Primary Frequency Response. The remaining capacity required for RRS may be supplied by all Resources qualified to provide RRS, provided that RRS from Load Resources on high-set under-frequency relays and Resources providing FFR shall be limited to 60% of the total ERCOT RRS requirement. ERCOT may increase the minimum capacity required from Resources providing RRS using Primary Frequency Response if it believes that the current posted quantity will have a negative impact on reliability or if it would require additional Regulation Service to be deployed. ERCOT may add more Operating Hours where prioritizing procurement of FFR up to the maximum FFR amount is beneficial in improving reliability if it believes that these additional hours are vulnerable to low system inertia. ERCOT will issue an operations notice when such a change is made. |

(6) The amount of RRS that a Qualified Scheduling Entity (QSE) can self-arrange using a Load Resource excluding Controllable Load Resources and Resources providing FFR is limited to its Load Ratio Share (LRS) of the capacity allowed to be provided by Resources not providing RRS using Primary Frequency Response established in paragraph (5) above, provided that RRS from these Resources shall be limited to 60% of the total ERCOT RRS requirement.

(7) However, a QSE may offer more RRS from Load Resources and Resources capable of providing FFR above the percentage limit established by ERCOT for sale of RRS to other Market Participants. The total amount of RRS Service using the Load Resource (excluding Controllable Load Resources) or Resources providing FFR procured by ERCOT is also limited to the capacity established in paragraph (5) above, up to the lesser of the 60% limit or the limit established by ERCOT in paragraph (5) above.

|  |
| --- |
| ***[NPRR863: Replace paragraph (7) above with the following upon system implementation:]***  (7) However, a QSE may offer more of the Load Resource above the percentage limit established by ERCOT for sale of RRS to other Market Participants. The total amount of RRS using the Load Resource procured by ERCOT is also limited to the capacity established in paragraph (5) above, up to the lesser of the 60% limit or the limit established by ERCOT in paragraph (5) above. |

|  |
| --- |
| ***[NPRR863: Insert paragraphs (8)-(10) below upon system implementation and renumber accordingly:]***  (8) Monthly, ERCOT shall determine and post on the MIS Secure Area a minimum capacity required from Resources providing ECRS. The amount of Load Resources excluding Controllable Load Resources that may or may not be on high-set under-frequency relays providing ECRS is limited to 50% of the total ERCOT ECRS requirement.  (9) The amount of ECRS that a QSE can self-arrange using a Load Resource excluding Controllable Load Resources is limited to the lower of:  (a) 50% of its ECRS Ancillary Service Obligation; or  (b) A reduced percentage of its ECRS Ancillary Service Obligation based on the limit established by ERCOT in paragraph (8) above.  (10) A QSE may offer more of the Load Resource above the percentage limit established by ERCOT for sale of ECRS to other Market Participants. The total amount of ECRS using the Load Resource excluding Controllable Load Resources procured by ERCOT is also limited to the lesser of the 50% limit or the limit established by ERCOT in paragraph (9) above. |

(8) The maximum MW amount of capacity from Resources providing FRRS-Up is limited to 65 MW. ERCOT may reduce this limit if it believes that this amount will have a negative impact on reliability or if this limit would require additional Regulation Service to be deployed.

(9) The maximum MW amount of capacity from Resources providing FRRS-Down is limited to 35 MW. ERCOT may reduce this limit if it believes that this amount will have a negative impact on reliability or if this limit would require additional Regulation Service to be deployed.

(10) Resources can only provide FRRS-Up or FRRS-Down if awarded Regulation Service in the Day-Ahead Market (DAM) for that particular Resource, up to the awarded quantity.

|  |
| --- |
| ***[NPRR1007: Delete paragraphs (8)-(10) above upon system implementation of the Real-Time Co-Optimization (RTC) project.]*** |

**ERCOT Nodal Protocols**

**Section 23**

**Form Q: INTERCONNECTION CIRCUIT DESIGNATION FOR DISTRIBUTION GENERATION RESOURCES AND DISTRIBUTION ENERGY STORAGE RESOURCES**

**Date TBD**

Date Received: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**INTERCONNECTION CIRCUIT DESIGNATION FOR DISTRIBUTION GENERATION RESOURCES AND DISTRIBUTION ENERGY STORAGE RESOURCES**

A Resource Entity with a Distribution Generation Resource (DGR) or Distribution Energy Storage Resource (DESR) must complete Part I and then submit this form to the interconnecting Distribution Service Provider (DSP) in accordance with Protocol Section 3.8.6, Distribution Generation Resources (DGRs) and Distribution Energy Storage Resources (DESRs).

The DSP must indicate in Part II whether the circuit interconnecting the DGR or DESR is subject to Load shed.

In Part III, the DSP must indicate whether any operational limitations for the DGR or DESR have been identified based on known system limitations or as a result of planning or operational studies, including studies performed in accordance with Planning Guide Section 5.4.2, Submission of Interconnection Agreement and TSP and/or DSP Studies and Technical Requirements.

Part IV of this form must be signed by the Authorized Representative (“AR”) or Backup AR for the Resource Entity or by any officer with the authority to bind the Resource Entity. Part V of this form must be signed by the AR or Backup AR for the DSP or any officer with the authority to bind the DSP.

The Resource Entity must submit the completed, executed form to ERCOT via email to [MPRegistration@ercot.com](mailto:MPRegistration@ercot.com) (.pdf version). If you need assistance completing this form, or if you have any questions, please call (512) 248-3900.

**PART I – RESOURCE REGISTRATION INFORMATION FOR DGR OR DESR**

**DGR or DESR** – Resource Entity shall identify the DGR or DESR as detailed in its Resource Registration information.

|  |  |
| --- | --- |
| **Resource Name** |  |
| **GENCODE** |  |
| **METER ID (if available)** |  |

**PART II – INTERCONNECTING CIRCUIT INFORMATION FOR DGR OR DESR IDENTIFIED IN PART I**

The DSP must check one of the following boxes:

|  |  |
| --- | --- |
| The distribution circuit interconnecting the DGR or DESR is subject to Load shed |  |
| The distribution circuit interconnecting the DGR or DESR is not subject to Load shed |  |

**PART III – IDENTIFICATION WHETHER ANY OPERATIONAL RESTRICTIONS HAVE BEEN IDENTIFIED FOR DGR OR DESR IDENTIFIED IN PART I**

The DSP shall indicate if any operational limitations have been identified by checking one:

|  |  |
| --- | --- |
| Operational limitations have been identified by the DSP as a result of planning or operations studies |  |
| No operational limitations were identified by the DSP as a result of planning or operations studies |  |

If operational limitations have been identified by the DSP, describe those limitations:

**PART IV – RESOURCE ENTITY AFFIRMATION**

I affirm that I have the authority to submit this form on behalf of the Resource Entity named below. .

|  |  |
| --- | --- |
| Name of Resource Entity |  |
| Signature of AR, Backup AR or Officer: |  |
| Printed Name of AR, Backup AR or Officer: |  |
| Date: |  |

**PART V – DISTRIBUTION SERVICE PROVIDER AFFIRMATION**

I affirm that I have personal knowledge of the facts stated in Parts II and III of this form, that I have the authority to execute this form on behalf of the DSP identified below, and that the DSP identified below is the interconnecting DSP for the DGR or DESR identified in Part I. I further affirm that all statements made and information provided in Parts II and III of this form are true, correct, and complete.

|  |  |
| --- | --- |
| Name of Distribution Service Provider |  |
| Signature of AR, Backup AR or Officer: |  |
| Printed Name of AR, Backup AR or Officer: |  |
| Date: |  |

1. Not currently a defined term, governed by the PUC authorized Pilot, further described here: https://www.ercot.com/mktrules/pilots/ader [↑](#footnote-ref-1)
2. Section 25.361 (k) states: “(k) Pilot Projects. (1) ERCOT may conduct pilot projects to provide a temporary platform to evaluate resources, technologies, services, and processes that demonstrate the potential to advance the operational and market functions of the ERCOT system. The pilot projects will allow ERCOT to validate performance claims of alternative technologies, evaluate the extent to which new technologies or processes can provide services that comply with federal and state reliability standards, and review how resources perform in various operational and market scenarios. As part of a pilot project, ERCOT may grant temporary exceptions from ERCOT rules, as necessary to effectuate the purposes of the pilot project. ERCOT may use information gained from pilot projects to inform the development of permanent changes to ERCOT rules.” [↑](#footnote-ref-2)
3. Re: Project No . 51603 - Review of Distributed Energy Resources, Memorandum from Commissioners McAdams and Glotfelty, available at <https://interchange.puc.texas.gov/Documents/51603_66_1221955.PDF> (filed July 13, 2022). [↑](#footnote-ref-3)