|  | **ERCOT RFP for Capacity During Winter 2023-24**  **Questions** |
| --- | --- |
| **1** | Can you clarify if standalone energy storage is eligible to participate? In one section it looked like the answer was yes, but I was a bit thrown off by the section on the main RFP site asking for specific generators to participate |
|  |  |
| **2** | Would you mind clarifying for us whether battery storage assets can qualify as Demand Response and therefore able to participate in this RFP? |
|  |  |
| **3** | Does a unit have to have been online/present AND determined to not have been price-responsive during winter 2022-23? What about assets that came online after winter 2022-23 and determine to not have been price-responsive? |
|  |  |
| **4** | We received the ERCOT notification about ERCOT requesting proposals for an additional 3,000 MW for the Winter period. Is this a part of the regular December – March contract period for Demand Response or is this in addition? I am asking because the time periods are outside of the ones in the SCT. Just wanted to understand so we can provide guidance to our DR customers and determine if we will participate |
|  |  |
| **5** | How will pricing be determined? Is it based all of the submissions or is it a calculation? |
|  |  |
| **6** | Based on the below section,3.4.4 if some of our DR units were not called on or were available this summer in an ERS event, they would still not be eligible for this program because they submit SCT for Dec23-March24? What if the time periods are different? For example, if a unit that did not participate in ERS selected Category 2 HE 0500- HE 1000 each day and in the ERS SCT period they selected Time Period 7 HE 1500-2100 weekend and ERCOT holidays. Would that be allowed or basically the customer if they were not called on for ERS and is eligible would have to choose if they want to participate in this program or in the ERS SCT Dec-Mar program? |
|  |  |
| **7** | What is the minimum duration and hours of obligation? ERCOT paper identified 8AM as the highest risk hour, does that mean that resource should be available for the hour with scarcity? |
|  |  |
| **8** | Does a 1-hour duration BESS resource qualify to participate? |
|  |  |
| **9** | We have a resource that will be energized mid-December 2023 but won’t qualify for Ancillary Service until March 2024. This resource will be able to provide energy. Does this resource qualify? |
|  |  |
| **10** | Can you clarify if standalone energy storage is eligible to participate? |
|  |  |
| **11** | We own transmission for SPP to one of the ERCOT DC ties. Are we able to participate in the ERCOT winter capacity RFP using this transmission? Any details regarding timelines, requirements etc would be appreciate. |
|  |  |
| **12** | 1. Would ERCOT entertain the possibility of connecting TM 2500 mobile generators at the generation resource sites listed in categories 1-3 in lieu of or in combination with the existing but mothballed generation?    1. These TM 2500 have the following requirements:       1. Existing Electrical Interconnection          1. Is an existing GSU available with capacity available on 13.8kV bushings?  Need roughly 35 MVA per unit.          2. If not, what is the interconnect voltage and we’ll go find a grey market unit if possible.       2. Natural gas access at a minimum of 475 psig       3. Depending on the air emissions limitations, is demineralized water available at 25 gpm per unit?          1. If not, is raw water available at roughly 40 gpm per unit? Rental demin trailers can be provided.    2. Schedule Timing       1. Introduction to the QSE and Resource Owners to evaluate the commercial interest in hosting these mobile generators at those generation resource sites       2. Development of commercial agreement with the Resource Owners       3. Development of RMR agreement between the Resource Owner and ERCOT per the terms of the RFP       4. Mobilization and installation of the mobile generators require ~2-3 weeks 2. TM 2500 Description    1. 31 MW per unit at ISO conditions    2. 12 dth/MWh HHV heat rate    3. 10 minute start ramp    4. 1 hour minimum run time; 1 hour minimum downtime    5. 100 ft x 50 ft of space for the CTG and controls trailer |
|  |  |
| **13** | Would ERCOT consider firm transmission rights sourcing SPP and sinking ERCOT across North and/or East DC tie as an eligible source of capacity related to this RFP? |
|  |  |
| **14** | Your current timeline does not align with ERS procurement. This creates the very real risk that sites do not clear either the Capacity RFP or the ERS Auction, which could cause some Demand Response capacity to not be available to ERCOT during this time of urgent need. Is it possible to coordinate or co-optimize this process with ERS? For example, would the timeline be moved up for DR resources so that we know whether to offer uncleared resources into ERS? |
|  |  |
| **15** | The current performance calculation (section 3.8) does not mention a baseline and makes it sound like “actual MWh” is just the resource’s consumption. Does the M&V section for Demand Response resources need to be amended to align with proper methodologies outlined in ERCOT ERS protocols? |
|  |  |
| **16** | Dispatch duration was not mentioned in the RFP. Is ERCOT able to provide guidance on what the max dispatch duration would be under this procurement? Is it possible to align that duration with the existing ADER protocols for Demand Response? |
|  |  |
| **17** | In the Market Notice there is a note that only there are only 4 types of capacity allowed …..   1. Mothballed Dispatchable Generation Resources (as of December 1, 2023): 2. Seasonally Mothballed Dispatchable Generation Resources (as of December 1, 2023): 3. Dispatchable Generation Resources that have decommissioned since December 1, 2020: 4. Dispatchable Generation Resources currently in the interconnection queue for which commercial operations could feasibly be accelerated to occur on or between December 1, 2023 and January 9,2024 while meeting all requirements under ERCOT Protocols and Operating Guides.   For 1-3 is this specific to the generator themselves or is this specific to only the interconnection point.  Meaning if you can mobilize generation to that interconnection point and there is space available could you place temporary power supply at site?  For number 4 – Does the SS, FIS and IA have to be completed to qualify.  – If so where could we find a list of owners of those in the queue? |
|  |  |
| **18** | 1MW minimum sizing requirement  This is the sizing requirement for utility scale generation. For Demand Response Capacity Sources, this requirement is cumbersome for residential DR. The minimum size for DR should follow the ADER pilot or requirements in other markets, such as CAISO which is all 100KW. Can ERCOT lower the bid volume threshold to allow residential DR  capacity resources to participate? |
|  |  |
| **19** | 6 hours duration requirement  All four categories require a 6-hour duration which is impractical for Demand Response Capacity Sources, especially for residential battery assets. The duration requirement should be shortened to 2 or 4 hours in accordance with the ADER pilot or duration requirement in other ISOs.  In a DR aggregation, a single resource doesn’t need to be available for the entire period in each category. For example, a 1MW DR aggregation with one battery and one C&I flexible load resource. When it provides capacity between HE18 and HE23, the battery will provide 1MW between HE18 and HE19 and the C&I load resource will provide 1 MW load reduction between HE19 and HE23. From ERCOT perspective, you will be receiving the same 1MW capacity attribute. Can ERCOT clarify this duration requirement in the RFP amendment and remove the barriers for residential DRs to participate? |
|  |  |
| **20** | Customer written authorization and site information submission  The RFP requires the resource entity to obtain written authorization from each customer before getting awarded in the RFP process for Demand Response Capacity Sources. This creates onerous challenges for residential VPP aggregators since we typically recruit customers after having resource commitment locked in with ERCOT, not the vice versa. When slicing the volume for the Demand Response Capacity Sources, the VPP aggregators will take into account the number of existing projects, the forecasted  enrollment rate, and performance forecast, etc. The financial consequences also ensure the VPP aggregators correctly slice the volume and not over commit in the RFP process.  Hence, the resource entity shouldn’t need to obtain customer authorization in the RFP process. And accordingly, the Demand Response Capacity Sources site information should also be submitted to ERCOT after resource entities executing the contract with ERCOT. The site information will be shared with ERCOT during the enrollment process after resource entities conclude the enrollment campaign with the customers.  Can ERCOT remove the requirement of providing customer authorization and site information in the RFP responses, instead, requiring this information during the resource  enrollment process? |
|  |  |
| **21** | Resource mix for Demand Response Capacity Sources  It’s not mentioned in the RFP, but a resource entity should be able to aggregate different types of technologies, including but not limited to smart thermostats, solar and batteries, EV chargers, as long as they can satisfy the product requirements defined in the RFP governing doc. Can ERCOT make the clarification on resource mix for the DR aggregation? |
|  |  |
| **22** | M&V for BTM solar and battery  Since behind the meter solar and battery can export to the grid and these assets can operate independently against the host load, the performance of this type of assets should rely on inverter data which is measured by revenue grade meters. Utility interval meter data is not needed to calculate performance here.  Can ERCOT make the clarification for measurement and verification (M&V) method for behind the meter battery? |
|  |  |
| **23** | The format of DR standby price  Given the product nature of standby capacity, the offer price for the Demand Response Capacity Sources should be in $/kW-season rather than in $/kWh. The DR resources will establish their performance (in KW) depending on their average performance over the event window during the three months of winter season.  Besides the option of offering the bid price in the $/kW/h format, can resource entities provide their bid price in $/kW/winter as a capacity pricing format? |
|  |  |
| **24** | What is the minimum duration and hours of obligation? ERCOT paper identified 8AM as the highest risk hour, does that mean that resource should be available for the hour with scarcity? |
|  |  |
| **25** | Does a 1-hour duration BESS resource qualify to participate? |
|  |  |
| **26** | We have a resource that will be energized mid-December 2023 but won’t qualify for Ancillary Service until March 2024. This resource will be able to provide energy. Does this resource qualify? |
|  |  |
| **27** | Can ERCOT publish the 25 highest-priced Settlement Intervals during the 2022-23 winter Peak Load Season? |
|  |  |
| **28** | What Load Zone is used to determine the 25 highest-priced Settlement Intervals for a DR Capacity Source? |
|  |  |
| **29** | Can a retail customer that partially curtailed during the 25 highest-priced Settlement Intervals participate as a DR Capacity Source with the remaining capacity available? |
|  |  |
| **30** | How does a DR Capacity Source receive payment from ERCOT if it is not represented by a QSE? If a customer participates directly in the program, how will ERCOT issue payment? |
|  |  |
| **31** | Can a Load Resource that participated in an ancillary service with a lower capacity amount and has additional incremental MW capacity available participate by offering in the additional incremental capacity to this winter capacity procurement? |
|  |  |
| **32** | Can critical loads with backup generation participate by offering in the MW amount provided by the backup generation? |
|  |  |
| **33** | Can ERCOT be more specific about the circumstances that would lead it to refer non-performance to PUCT for enforcement? |
|  |  |
| **34** | Can an aggregated DR Capacity Source have sites located anywhere in ERCOT, or are aggregations limited to particular zones? |
|  |  |
| **35** | How will ERCOT establish the baseline against which demand reductions are measured for DR Capacity Sources? |
|  |  |
| **36** | How will ERCOT allocate the costs of the procurement? |
|  |  |
| **37** | Please specify a maximum total cost cap for the total procurement for the program that ERCOT will not exceed to allow for the retail market to estimate cost impacts (i.e. $100 million). |
|  |  |
| **38** | ERCOT states that it reserves the right to reject uneconomic offers, even if that results in the procurement clearing fewer than the sought 3,000 MWs. Can ERCOT explain whether it will use the market’s Value of Lost Load as a measure of an offer’s economics or, if not, specify on what other basis ERCOT will use to reject an offer because it is uneconomic? |
|  |  |
| **39** | Will ERCOT employ a numerical offer price cap, or otherwise impose a methodology that results in an effective offer price cap for the purpose of this procurement? |
|  |  |
| **40** | Will demand response resources deployed under this program be incorporated into the Reliability Deployment Price Adder? |
|  |  |
| **41** | Will ERCOT conduct a similar capacity procurement going forward for future high load periods (future summer and winter periods)? |
|  |  |
| **42** | Please provide the exact settlement formula that will be used to calculate the payment for DR Capacity Sources considering the adjustment based on its availability and event/test performance. |
|  |  |
| **43** | The Governing Document states that “For each ERCOT test or deployment of a DR Capacity Source, ERCOT may calculate an event performance factor…” Under what circumstances will ERCOT NOT calculate an event performance factor? |
|  |  |
| **44** | Can residential customers in the competitive retail market participate through an aggregation if they did not respond to price during 25 highest-priced Settlement Intervals during the 2022-23 winter Peak Load Season? |
|  |  |
| **45** | Can residential customers in the competitive retail market participate through an aggregation if they did not respond to price during 25 highest-priced Settlement Intervals during the 2022-23 winter Peak Load Season but joined a price-based retail DR product after the 2022-2023 winter Peak Load Season? |
|  |  |
| **46** | Can residential customers in the competitive retail market participate through an aggregation if they did not respond to price during 25 highest-priced Settlement Intervals during the 2022-23 winter Peak Load Season but are on a price-based retail DR product for summer only? |
|  |  |
| **47** | How will ERCOT verify the MW quantity for a residential aggregation DR Capacity Source during qualification? |
|  |  |
| **48** | How will ERCOT verify and measure performance for a residential aggregation DR Capacity Sources during testing or called events? |
|  |  |
| **49** | How will ERCOT verify and measure the performance of single site DR Capacity Sources? Meter-before, meter-after? What baseline methodology is being used? Is there a specific methodology like ERS? |
|  |  |
| **50** | Why is there no provision made to differentiate weekdays vs weekends? Load varies weekday vs weekend not just morning or night. |
|  |  |
| **51** | Please provide an example of a DR Capacity Site with multiple sites, multiple time periods, multiple categories, multiple volumes, and how the event performance would be calculated? |
|  |  |
| **52** | Time periods don’t appear factored into the DR Source site information sheet. |
|  |  |
| **53** | What is ERCOT trying to determine from the minimum deployment time in the Operating Parameters section of the DR Capacity Source Offer Sheet? |
|  |  |
| **54** | What is the definition of an “LSE program”? |
|  |  |
| **55** | What happens If two entities enroll the same ESIID as a DR Capacity Source? |
|  |  |
| **56** | Will ERCOT disclose Demand Response Capacity Source Site Information when publishing awards or only the Demand Response Capacity Source name? Will any customer specific information be disclosed like name, address, price, award terms etc.? What information will be public? |
|  |  |
| **57** | Section 3.6.2.3 of the RFP discusses a development plan/Gantt chart regarding capacity sources to be provided with the RFP response. In order to provide all the information ERCOT is seeking, could you provide a sample development plan/Gantt chart? |
|  |  |
| **58** | How will ERCOT administer the 2-year participation restriction for customers participating in ERS and as Load Resources in ancillary services? What is the date the restriction starts? If a customer stopped participating in ERS or as a Load Resource in ancillary services in December of 2021 would they be eligible to participate in the program? |
|  |  |
| **59** | Pursuant to Winter 2023-2024 Contract for Capacity Governing Document Section 1.1(5)(a), Page 4, “Each Generation Resource must be available all hours of every day during the Contract Period.” How will ERCOT address a Generation Resource’s operational limitations, such as a Forced or Maintenance Outage, provided that any operational limitations are communicated to ERCOT and addressed in a timely manner? If an operational issue is identified, can the Generation Resource schedule an outage to address during a Maintenance Outage? If so, how does this impact the incentive payment? |
|  |  |
| **60** | Pursuant to Winter 2023-2024 Contract for Capacity Governing Document Section 1.2, Page 4, if there is a material failure to perform, including a termination of the Contract for Capacity, does this relieve ERCOT from paying the Capacity Source O&M fees that were agreed upon, to be ready for Winter 2023-2024, or is there solely a reduction in the Incentive Factor? |
|  |  |
| **61** | Pursuant to Winter 2023-2024 Contract for Capacity Governing Document Section 2.1(5), Page 5, will ERCOT utilize the DA forecast to request the Generation Resource Capacity Source come online, if the Generation Resource Capacity Source has long startup lead times? |
|  |  |
| **62** | Pursuant to Winter 2023-2024 Contract for Capacity Governing Document Section 2.1(5), Page 5, will ERCOT allow a Generation Resource to be bid into the DA Market if ERCOT feels that capacity resources are low? |
|  |  |
| **62** | Pursuant to Winter 2023-2024 Contract for Capacity Governing Document Section 2.2(1), Page 6, how does the Generation Resource Capacity Source Owner get compensated for fuel when no contract currently exists? |
|  |  |
| **63** | Pursuant to Winter 2023-2024 Contract for Capacity Governing Document Section 2.2(5), Page 7, shall the Incentive Factor never be less than zero, similar to an RMR Agreement? |
|  |  |
| **64** | Pursuant to Winter 2023-2024 Contract for Capacity Governing Document Section 2.3(1), Page 7, does ERCOT foresee the need to conduct a Capacity Test during the Contract for Capacity term? |
|  |  |
| **65** | Pursuant to Winter 2023-2024 Contract for Capacity Governing Document Section 2.2(5), Page 7, does ERCOT foresee the need to conduct a Capacity Test during the Contract for Capacity term? |
|  |  |
| **66** | Pursuant to the Offer Sheet Template for a Generation Resource Capacity Source Section 4 Total Eligible Costs, Page 3, will Generation Resources be able to recover winter preparation regulatory compliance costs associated with PUCT Rule §25.55. Weather Emergency Preparedness, as well as any and all O&M costs that are incurred prior to the start date of the Contract for Capacity for Winter 2023-2024 with ERCOT? |
|  |  |
| **67** | Pursuant to Offer Sheet Template for a Generation Resource Capacity Source Section 1(E) Description of Generation Resource, Page 1, is a Generation Resource that is currently mothballed as of December 1, 2023, but subsequently decides to execute a Contract for Capacity for Winter 2023-2024, required to submit a Notification of Change of Generation Resource Designation to ERCOT, pursuant to ERCOT Nodal Protocols Section 22, Attachment H? |
|  |  |
| **68** | The Request for Proposals for Contracts for Capacity Section 2.3 Payments, Page 9, contains the following statement, which mentions a potential “clawback”: “Failure by any Entity to provide the contracted service will result in withholding or claw-back of all or part of the payment pursuant to the Governing Document and the Contract for Capacity and may subject the Entity to enforcement action by the Public Utility Commission of Texas, among other remedies that may be provided in the Contract for Capacity, the Governing Document, and this RFP.” But the Contract template and the Governing Document do not mention clawback, nor do the Protocols or standard form agreement governing RMRs. Thus, please explain what will govern ERCOT’s decision-making regarding when and how to implement any “clawback.” |
|  |  |
| **69** | Can ESRs participate in the RFP? If so, what are the requirements for participation? |
|  |  |
| **70** | At what stage of development is capacity considered existing, or new and eligible for the RFP? |
|  |  |
| **71** | Can an ESR commit capacity for specific hour blocks? |
|  |  |
| **72** | Can an ESR commit a portion of its capacity to ensure it can sustain discharge for the required duration? |
|  |  |
| **73** | Does the Entity providing DR Capacity need to be registered with ERCOT (QSE etc.)?   * Winter 2023-24 Contract for Capacity Governing Document—Section 3 page 8 |
|  |  |
| **74** | Is a DR Capacity Source with an ESI ID is associated with a critical load but the critical load has backup generation is it available? (Similar to Load Resource Attestation form)   * ERCOT Contracts for Capacity RFP Winter 2023-24 10-2-23—Section 2.28 page 10 |
|  |  |
| **75** | In terms of Standby Payment, does payment begin Dec 1 or when contract is signed?   * Winter 2023-24 Contract for Capacity Governing Document—Section 3.3 pg 9 |
|  |  |
| **76** | Does the limit of 3 deployments per Contract Period relate to the DR category? Ex. Choose DR Category 4---then only expect a max of 3 combined deployments in across both HE5-10 and HE18-23   * Winter 2023-24 Contract for Capacity Governing Document—Section 1.1.4 page 3 |
|  |  |
| **77** | Is the DR Capacity Source Monthly Availability Calculations performed on each meter or at the aggregation level? (ex. Allows for load offset between meters in aggregation)   * Winter 2023-24 Contract for Capacity Governing Document—Section 3.7.1 pg 13 |
|  |  |
| **78** | If DR Capacity Source doesn’t have an IDR meter installed, will ERCOT accept a DR Capacity Source with alternative meter data solutions?   * Winter 2023-24 Contract for Capacity Governing Document—Section 3.6 pg 12 |
|  |  |
| **79** | Is DR Capacity Source deemed ineligible if the resource has never been enrolled in a Winter DR Program but participates in Summer DR Programs? In this case, the DR Capacity Source is providing incremental Winter DR Capacity via the RFP.   * Winter 2023-24 Contract for Capacity Governing Document—Section 3.4.4 pg 11 |
|  |  |
| **80** | Could a standalone or aggregated fleet of utility-scale energy storage resources participate in the Demand Response RFP? |
|  |  |
| **81** | Does ERCOT see value in a standalone or aggregated fleet of utility-scale storage committing to not charge during a demand response time period (hours ending 0500-1000 or 1800-2300)? If so, what type of agreement would the resource owner be expected to enter into with ERCOT to provide this service/commitment? |
|  |  |
| **82** | Does ERCOT see value in a standalone or aggregated fleet of utility-scale storage committing to be charged up and available through a demand response time period (hours ending 0500-1000 or 1800-2300)? If so, what type of agreement would the resource owner be expected to enter into with ERCOT to provide this service/commitment? |
|  |  |
| **83** | Which hour ending period, 0500-1000 or 1800-2300, would coverage from a standalone or aggregated fleet of utility-scale energy storage resources be most valuable to ERCOT? |
|  |  |
| **84** | Which Load-Zone(s) are most attractive for ERCOT under this RFP? |
|  |  |
| **85** | If dispatched in the demand response program (Maximum of 3 deployments, 18 hours total), would a standalone or aggregated fleet of utility-scale storage realize real-time market prices? |
|  |  |
| **86** | Would demand response resources have to forgo ancillary service participation during committed demand response time periods (hours ending 0500-1000 or 1800-2300)? |
|  |  |
| **87** | **Question topic 1):**   * related to topic:  ERCOT RFP for capacity during Winter 2023-24 * related to document:  “Winter 2024-24 Contract for Capacity Governing Document 10-2-2023”   + <https://www.ercot.com/files/docs/2023/10/02/Winter-2023-24-Contract-for-Capacity-Governing-Document-10-2-23.docx> * In this document related to section:  “Section 3 Standards for demand response capacity sources”   + in this section the statement is made:  “A DR Capacity Source need not be represented by a QSE for the purposes of a Contract for Capacity.”   + Specific question 1a: **In light of this statement please confirm if this means that a retail electric customer can directly contract with Ercot such that no QSE or REP (retail electric provider) necessarily needs to be involved in the Contract for Capacity.  If this is the case will the retail customer get direct payment from Ercot for an accepted DR capacity offer ( subject to defined event performance, etc)?**   + Specific question 1b**:  If it is indeed true that a retail electric customer can directly contract with ercot for a DR capacity offer, will the retail electric customer itself be named as the Entity receiving the award.** |
|  |  |
| **88** | **Question topic 2):**   * related to topic:  ERCOT RFP for capacity during Winter 2023-24 * related to document/notification: “M-A100223-01 Issuance of Request for Proposals for Capacity for Winter 2023-24 under ERCOT Protocols Section 6.5.1.1(4)   + related to statement in this document/notification: “ERCOT will issue a Market Notice on November 23, 2023 identifying the Entities receiving awards along with the relevant MW quantities and prices awarded.”   + Specific question 2a :  **If the retail electric customer is the direct applicant for an accepted DR capacity offer, will the retail electric customer itself be identified as the Entity receiving the award?**   + Specific question 2b :  **if a QSE is the direct applicant for an accepted DR capacity offer, will the QSE be identified as the Entity receiving the award?  And in this case would the retail electric customer owning the Site or Sites not be identified in the award?**   + Specific question 2c:  **if another qualifying party is the direct applicant for an accepted DR capacity offer will this other qualifying party be the identified as the Entity receiving the award ? And in this case would the retail electric customer owning the Site or Sites not be identified in the award?** |
|  |  |
| **89** | Are solar projects eligible for the RFP? If so, what are the requirements? |
|  |  |
| **90** | ERCOT states that participating “DR Capacity Sources are not eligible for Energy payments.”  Please confirm that the Load Serving Entity representing residential premises injecting during a contracted time period will still receive the real-time load zone price for any energy injections.  ERCOT states that “Sources of Demand response may be offered by any Entity that has been explicitly authorized in writing by the Customer to provide the Demand response.”  Please confirm that a record of an in-app acceptance / authorization to offer the Resource in a demand response program is acceptable. |
|  |  |
| **91** | ERCOT states that Eligible DR Capacity Sources “include individual Customers and aggregations of individual Customers served by a Transmission and/or Distribution Service Provider (TDSP).”  Please confirm either (a) that an aggregation can span multiple TDSPs and load zones or (b) aggregations must be limited to participants in a single TDSP. If aggregations can span the ERCOT system, then can ERCOT accept NOIE-level electrical location identity (rather than electrical bus)? |
|  |  |
| **92** | Tesla Powerwalls have the ability to monitor and meter both device and premise activity with revenue grade precisions.  Please confirm that:  I. Device Level Metering be used as an alternative to a premise baseline for the calculation of capacity availability and performance.  II. Device level metering may substitute for NOIE provided metered data for NOIE located premises. |
|  |  |
| **93** | ERCOT states that “ERCOT shall dispatch DR Capacity Sources during deployment events or unannounced tests by means of a verbal instruction via telephone call (ERCOT will not issue instructions via a QSE Hotline call because offering Entities may not be QSEs). The end of the instruction shall represent the start of the Ramp Period.”  Please confirm that:  I. An Offering Entity may receive a deployment signal in addition to or as an alternative to a phone call?  II. Is the ramp period 15 minutes, since the assessment is based upon achieving 95% of the obligation within the first 15-minute interval? |
|  |  |
| **94** | Can unannounced tests be constrained to a shorter window (e.g. 48-hours) so that (1) the premise / device owner can use their device for its intended purpose on days where risk of an EEA is low, and (2) the aggregator can pre-condition the device, as they would for a looming weather event (e.g. Looming winter events like Winter Storm Elliot and Winter Storm Uri we noticed far in advance of an EEA declaration.) |
|  |  |
| **95** | ERCOT states that “QSEs or other Entities offering DR Capacity Sources that include Sites located in a territory served by a NOIE are responsible for arranging with the NOIE TDSP to provide ERCOT with all interval meter data that will be necessary to ensure.”  Please confirm that in lieu of submitting NOIE data, may the aggregator submit premise and/or device level interval metering from device metering? |
|  |  |
| **96** | ERCOT states that “ERCOT will consider the DR Capacity Source to have been available for any 15-minute interval during its Hours of Obligation in which the DR Capacity Source’s Actual Load was greater than 95% of the DR Capacity Source’s awarded obligation; otherwise, the DR Capacity Source will be considered unavailable for that 15-minute interval. The Monthly Availability Factor will be the ratio of the number of 15-minute intervals the DR Capacity Source was available during the Contracted Month divided by the total number of obligated 15-minute intervals in the Contracted Month.”  Please provide confirmation whether as an additional and alternative method of compliance with the availability requirements proposed in the RFP V1, would ERCOT consider device level metering and state of charge to demonstrate the Availability of the Capacity Source similar to other constructs in which ERCOT has allowed for device-level metering (such as the ERCOT Aggregate Load Resource Framework and the ERCOT Aggregated Distributed Energy Resources Governing Document)? |
|  |  |
| **97** | Submitting precise participating residential premises in advance of an award is challenging, if not impossible to manage. Prospective participants would consider a potential offer, affirm their willingness to participate, and find out later if their aggregator was selected.  Please provide confirmation on whether as an alternative, ERCOT will consider allowing the aggregator to offer their estimated capabilities and be compensated only the capacity they deliver in real-time. This is similar to the California Public Utility Commission’s efforts to implement their Emergency Load Reduction Program (ELRP). ELRP compensates participants based upon the incremental energy they deliver after a declared grid emergency. There is no estimated capacity promised, and unavailability during a deployment is not culpable for a penalty. Residential customers, unlike wholesale market participants, enroll in grid-rescue programs based upon their availability in real-time, rather than an obligation and potential penalties.  Tesla further notes that If ERCOT does not wish to mirror California’s model to recruit load participation without a fixed quantity obligation, then ERCOT may wish to consider the substitution process allowed in ERCOT’s ERS program. The aggregator would be responsible for the premises and a quantity at the onset of the contract but could later substitute sites to achieve the promised capacity. |
|  |  |
| **98** | Tesla proposes the following Enrollment Requirements changes to facilitate participation from residential battery energy storage:  i. Modify the structure of the RFP to ensure that customer sign-up/enrollment follows, rather than precedes, the contract award allowing the offering entity to build a defined and certain program. Thereby, allow for the fleet of eligible participants to grow as more customers enroll over the season, as opposed to the proposed RFP structure of pre-committing a specific set of enrolled customers in a Resource. The offering entity would still be committed to updating capability through the season.  ii. Address data collection difficulties that are more easily handled by alternative means, e.g., address the current requirement for substation information to be made available by the offering entity, which only the LSE/NOIE may have. |
|  |  |
| **99** | Are Transmission Service Providers, as defined by the ERCOT Protocols, eligible to participate in the program? |
|  |  |
| **100** | Are Distribution Service Providers, as defined by the ERCOT Protocols, eligible to participate in the program? |
|  |  |
| **101** | A NOIE has sole discretion and exclusive jurisdiction to authorize third parties to provide services in its service territory. For Demand response Resources located in NOIE service territories, how will ERCOT ensure and verify that the Entity has written authorization from and coordinates with the NOIE to provide the Demand response Capacity services to  the NOIE’s customers in the NOIE’s service territory? |
|  |  |
| **102** | Will ERCOT modify the NOIE Authorization Form for QSEs Representing ERS or Load Resources to include Entities providing Demand response Capacity or will ERCOT create a new form? |
|  |  |
| **103** | Will NOIEs be subject to clawback or other enforcement action if the NOIE’s metering information regarding Demand response Capacity availability is not verifiable due to events on the NOIE’s side of the meter? |
|  |  |
| **104** | How will ERCOT ensure that any awarded Demand response Capacity is excluded from a NOIE’s seasonal Load shed allocation? |
|  |  |
| **105** | Does ERCOT’s RFP allow for an aggregation of Demand response Capacity provided by a group or consortium of NOIEs in an effort to achieve the 1 MW threshold? |
|  |  |