

Nationwide Energy Partners is a company that offers energy and submetering services to multifamily business owners. Our business drives private investment into energy technology and services that create grid supporting resources.

In the ongoing effort to expand and improve the Aggregated Distributed Energy Resources (ADER) Pilot Program, the ERCOT Wholesale Market Subcommittee (WMS) is being asked to provide feedback on the vexing issue of keeping current ERCOT requirement that the Qualified Scheduling Entity (QSE) representing the ADER must be the same QSE representing the Load-Serving Entity (LSE), or whether third party QSEs should be allowed to participate.

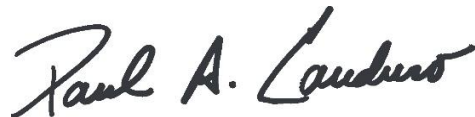
NEP supports the “3rd party QSEs for NCLR-type ADERs when the individual premises/devices that make up the aggregation are larger than 100kW” option that ERCOT staff will present to the WMS on May 7. We support this option because:

- Most REPs do not use a Level 4 (L4) Qualifying Scheduling Entity (QSE) needed to participate in ERCOT’s ancillary services programs due to cost and related regulatory burdens. For master metered multifamily properties, eliminating the matching QSE requirement will enable the property owner to choose a REP for load that does not use an L4 QSE but offers a low rate and then choose a separate L4 QSE for ADER participation.

The ERCOT ADER Pilot Program offers a unique opportunity for this change to be made and systems perfected. We believe that the data, technology and systems, as implemented by other grid operators, are available to resolve concerns that this change could negatively impact obligations undertaken separately by the customer's REP.

Businesses should not have to decide between a good rate and participation in the energy market. NEP encourages the WMS to support third-party QSEs in the ADER Pilot Program for the betterment of the grid.

Respectfully,



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