

Here are my questions and comments:

Aggregation Manual

Sec. 2.1.1

This section begins, “The Distribution Utility will notify the Aggregator and DER when planned distribution system outages are expected to impact the operation of DER participating in the Aggregator’s Aggregation.” I think this is the first instance of many where the singular “DER” is used instead of the plural “DERs,” which makes it sound like each Aggregator has only a single DER in each Aggregation. I would change this to the plural in this section and all subsequent sections. I would also clarify which DERs we’re talking about, so this would read along the following lines: “The Distribution Utility will notify the Aggregator for a given Aggregation and the DERs participating in that Aggregation when planned distribution system outages are expected to impact the operation of DERs participating in that Aggregation.”

Sec. 2.1.3

I am not sure that I understand the paragraph that immediately precedes Fig. 1. Consider the situation illustrated in the left part of that figure, where an Aggregation can supply 4 MW of supply and can withdraw up to 5 MW. The diagram, and the language in that paragraph, states that the Aggregator can only submit a bid for the 1 MW difference between the 4 MW it can supply and the 5 MW it can withdraw; i.e., it can only be dispatched somewhere between a net injection of 0 MW and a net injection of -1 MW. But it is actually capable of a net injection as high as 4 MW and as low as -5 MW. Can you remind me why it’s not permitted to submit a bid that reflects that full potential range of net injection levels?

Sec. 2.1.6

The first part of the second sentence repeats the beginning of the first sentence, so I would delete the part that begins with “The Aggregator shall” and ends with “verify,” and replace it with “and.”

Sec. 2.1.10

I would clarify that the SRA will identify Aggregations to ensure that they have bids available for that time at which they are needed so that they can be dispatched at that time, which is the explanation that I thought I heard during the meeting as to why it was necessary to conduct an SRA to ensure that the dispatch range of a dispatch-only Aggregation is available when dispatch-only Aggregations are “treated as always available for dispatch, consistent with their Bids,” per Sec. 2.

Day-Ahead Scheduling Manual

Sec. 4.2.3

In the “Beginning Energy Level (for ESR)” subsection, change “their” to “its.” And “ESR” should be “ESRs,” both in the title and the first sentence.

T&D Operations Manual

Sec. 2.2.7.1

Doesn’t this need to be generalized to apply to Resources that receive a basepoint to withdraw energy and do not follow that basepoint?

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