

From: John Fernandes [mailto:John.Fernandes@res-americas.com]
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To: Energy Storage
Subject: Comments: Energy Storage Interconnection

Good afternoon,

Per the conference on April 7, RES Americas has a few thoughts to share in regards to the interconnection of energy storage resources. These discussion points are not for immediate attention for the Cluster 7 window.

- First, allowing resources to interconnect to distribution infrastructure and provide services to the wholesale market is a critical rule in California. Recognizing that there has been no mention, to our awareness, of preventing storage resources from following such mechanisms, it is worth highlighting as a key “first step”.
- RA did come up during the call on the 7th. A separate fast-track process for specific storage technologies that allows these facilities to qualify for RA should be appropriate given the flexible and fast-responding operating characteristics of certain systems.
- Perhaps broadening the scope of the discussion, modeling of storage should be examined. Storage is neither generation nor load, and modeling resources as one or the other, or both separately, can create false system impacts, acting as a roadblock to project deployment.
- This process should examine interconnection processes and the modeling of storage acting as a transmission resource, or even storage providing system (voltage) quality instead of energy and/or capacity.
- Time to construction and the obligation of utilities to provide required system service for an approved project can dramatically impact the economic viability of a project.
- Finally, though not part of the interconnection process, RES would like to call to the ISO’s attention the importance of charging rules for storage resources. Requiring storage facilities to charge at a retail tariff rate is a substantial barrier to entry into the California market.

Please let me know if you could use clarification on any of the above points. RES appreciates the ISO’s special attention to energy storage.

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