Comments of Beacon Power on Issues Raised at the January 13th ISO Integration of Renewable Resources (IRRP) Meeting

Beacon Power hereby submits these limited comments on the elements of the ISO Integration of Renewable Resources Program (IRRP) related to energy-storage technology that were addressed at the January 13th meeting. We expect to supplement these comments with additional feedback after the January 20th ISO Energy Storage Workshop.

<u>Wide Energy Storage and Management Study</u>: We would like more information about the proposed Wide Energy Storage and Management System Study generally, since this element was not well-explained at the January 13th meeting.

<u>Need for studies and/or pilot programs:</u> We support ISO pilot programs and studies, as needed, to determine:

- Modifications to the ISO's operating procedures and algorithms to enable combination of multiple short-duration ramping resources (like energy-storage resources) to meet ISO ramping needs; and
- **Operational tradeoffs and benefits** of ISO procurement of traditional vs. Fast Regulation services.

<u>Participation in the IRRP Working Group:</u> Beacon volunteers to participate in the proposed working group and appreciates the ISO's intent to involve stakeholders at the development level to future work in this area.