

**NRG Energy, Inc. Comments on Energy Storage and Distributed Energy Resource Stakeholder Initiative  
Revised Scope and Schedule**

<b>Submitted by</b>	<b>Company</b>	<b>Date Submitted</b>
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The CAISO puts the following issues in scope for 2015 (from June 25, 2015 Revised Scope and Schedule, page 10, emphasis added):

4. Specify tariff provisions needed for the following two multiple use applications
  - a. *Non-RA* DER provides services to the distribution system (operational services and infrastructure deferment) and participates in wholesale market.
  - b. *Non-RA* behind-the-end-use customer meter DER provides services to end-use customer and participates in wholesale market.

NRG appreciates that the CAISO is moving forward with work on two "mixed use" cases in 2015. However, NRG is concerned about focusing this important work solely on *non-RA* cases.

The CAISO explains that it is deferring consideration of RA cases pending the completion of work underway in two other stakeholder processes – the Flexible Resource Adequacy Capacity and Must Offer Obligations Phase 2 ("FRACMOO2") and the Reliability Services Initiative Phase 2.

As NRG understands, these two initiatives will focus on (1) criteria and standards for Non-Generator Resources (NGRs) to provide flexible capacity and (2) the offering obligation that will be attached to such resources.

While it will take some time to address the flexibility criteria and offering obligation issues, NRG respectfully requests that the CAISO not unduly limit discussions of and work on these mixed use cases in the ESDER initiative only to non-RA resources, but begin work on these mixed use cases for RA resources as well and conduct that work in parallel with the work being done in the FRACMOO2 and RS12 initiatives. NRG sees these mixed use case discussions as key to laying the foundation for groundbreaking work on aggregated DER participation in the wholesale markets and hopes these important discussions are not delayed until the FRACMOO2 and RS12 initiatives are complete.

Thanks for the opportunity to provide these comments.