

COMMENTS OF DEMAND POWER GROUP INC.

The proposed eligibility rules for the demonstration project require that the Direct Participant be a Customer of the DSO and own the DER. The rules for an Aggregator appear to require that the Aggregator must be comprised of two or more Contributor DERs.¹ These formulations may act as an unintended barrier to entry into the Demonstration in that they do not allow for other viable configurations.

For example, a potential participant in the Project may meet all of the requirements set forth for an Aggregator, except that it only offers one Contributor DER. The proposed rules are somewhat contradictory on this point in that Section 2.1 states that “An Aggregator DER is comprised of two or more Contributor DERs of the same resource category” whereas Section.2.3.1 (e) indicates that the Aggregator “must register one or more Aggregator DERs in the Demonstration.”

Similarly, a Customer may be willing to participate in the Demonstration and will authorize participation but does not own the DER. This scenario may be quite common for Customers who want the advantages of storage (as a service) but who do not wish to own the storage.

Demand Power requests that Alectra clarify that the following arrangement can participate in the Demonstration as either a Direct Participant, an Aggregator, or a new category of Participant:

A third party owns a single storage device which is connected behind the meter to the load of an Alectra customer. Another party has authority to operate and manage the storage. The Customer is also party to a contract with an electricity retailer. The Customer authorizes the owner of the storage device and the operator to participate in the Demonstration and all parties (the owner of the storage, the operator, the Alectra customer and the retailer) are all willing to execute Appendix B-Electricity Retailer Waiver to the Rules. In sum, the Customer and all other involved parties authorize the owner and Operator of the battery to do everything necessary to participate in the Project.

This arrangement satisfies all of the requirements associated with an Aggregator except that it encompasses only one DER. This arrangement can contribute to satisfying the objectives of the Demonstration. There is no reason why the Demonstration should be deprived of the capacity offered by this arrangement. Therefore, Demand Power requests that the DSO make clear that the arrangement set forth above meets the eligibility requirements of the Demonstration.

¹ Section 2.3 says in part “An Aggregator DER is comprised of two or more Contributor DERs of the same resource category....”