



June 10, 2024

BY ELECTRONIC FILING

The Honorable Debbie-Anne A. Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: *ISO New England Inc., Filing to Comply with April 2024 Order Regarding
Order No. 2222 Compliance, Docket No. ER22-983-_____***

Dear Acting Secretary Reese:

Pursuant to Rule 1907¹ of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, ISO New England Inc. (the "ISO" or "ISO-NE")² hereby respectfully submits this transmittal letter and revisions to the Tariff to comply with the directives in the Commission's Order on Compliance Filing, issued on April 11, 2024, in the above-captioned proceeding.³ The April Compliance Order accepted, subject to further compliance, the Tariff revisions included in the ISO's January 31, 2024 filing,⁴ regarding Order No. 2222.⁵ The instant filing addresses the April Compliance Order's additional filing requirement related to the inclusion

¹ 18 CFR § 385.1907.

² Capitalized terms used but not defined in this response are intended to have the meaning given to such terms in the ISO New England Inc. Transmission, Markets and Services Tariff ("Tariff").

³ *ISO New England Inc.*, Order on Compliance Filing, 187 FERC ¶ 61,017 (2024) ("April Compliance Order"); *see also ISO New England Inc. and New England Power Pool Participants Committee*, Tariff Filing to Allow Participation of DER Aggregations in New England Markets, Docket No. ER22-983-000 (Feb. 2, 2022) ("Compliance Filing").

⁴ *ISO New England Inc.*, Further Filing Regarding Order No. 2222 Compliance, Docket No. ER22-983 (January 31, 2024) ("January Compliance Filing").

⁵ *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Order No. 2222, 172 FERC ¶ 61,247 (2020), *order on reh'g*, Order No. 2222-A, 174 FERC ¶ 61,197 (2021), *order on reh'g*, Order No. 2222-B, 175 FERC ¶ 61,227 (2021).

of the metering data submission deadlines for Distributed Energy Resource (“DER”) Aggregations (“DERAs”) participating in New England Markets (hereinafter “Metering Data Submission Revisions”).⁶ The ISO respectfully requests that the Commission accept the Metering Data Submission Revisions filed herein effective November 1, 2026 to coincide with the effective date of the rules that the Commission has previously accepted for DERA participation in the energy and ancillary services markets.⁷

I. DESCRIPTION OF THE FILING PARTY AND COMMUNICATIONS

The ISO is the private, non-profit entity that serves as the Regional Transmission Organization (“RTO”) for New England. The ISO operates the New England bulk power system and administers New England’s organized wholesale electricity market pursuant to the ISO Tariff and operating agreements with transmission owners. In its capacity as an RTO, the ISO has the responsibility to protect the short-term reliability of the New England Control Area and to operate the system according to reliability standards established by the Northeast Power Coordinating Council (“NPCC”) and the North American Electric Reliability Corporation (“NERC”).

All correspondence and communications in this proceeding should be addressed to the undersigned as follows:

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II. BACKGROUND

On September 17, 2020, the Commission issued Order No. 2222, directing Regional Transmission Organizations and Independent System Operators (“RTOs/ISOs”) to remove barriers to the participation of DERAs in the wholesale markets they operate. In Order No. 2222, the Commission found that existing RTO/ISO market rules were unjust and unreasonable “in light of barriers that they present to the participation of DERAs in RTO/ISO markets, which reduce competition and fail to ensure just and reasonable rates.”⁸ To address this, the Commission

⁶ See April Compliance Order at P 13; Ordering Paragraph B.

⁷ *ISO New England Inc.*, Order on Compliance Filing, 182 FERC ¶ 61,137 (2023) (“Compliance Order”) at P 15.

⁸ Order No. 2222 at P 1.

modified its regulations to require that RTOs/ISOs revise their tariffs to facilitate the participation of DERAs in wholesale markets. Specifically, RTOs/ISOs were required to establish DER Aggregators as a type of Market Participant that can register DERAs under one or more participation models that accommodate the physical and operational characteristics of each DERA, and allow DERAs to provide all the services that they are technically capable of providing.

On February 2, 2022, the ISO, NEPOOL, and the Participating Transmission Owners (“PTOs”), submitted the Compliance Filing, which included modifications to the Tariff that established a pathway for DERAs to participate in the New England Markets. The Tariff revisions achieved this by: creating new, and modifying existing, market participation models for DERA use; establishing eligibility requirements for DERA participation (including size, location, and information and data requirements); setting bidding parameters for DERAs; requiring metering and telemetry arrangements for DERAs and individual DERs; and providing for coordination with distribution utilities and relevant electric retail regulatory authorities (“RERRAs”) for DERA/DER registration, operations, and dispute resolution purposes.⁹

On March 1, 2023, the Commission determined that the Compliance Filing partially complied with the requirements of Order No. 2222 and accepted the majority of the proposed Tariff revisions, subject to further compliance filings to be submitted within 30, 60, and 180 days of the Compliance Order.¹⁰ Of particular relevance to the instant filing, the Compliance Order rejected the proposed Tariff revisions providing for the Host Utility¹¹ or its Assigned Meter Reader,¹² rather than the DER Aggregator, to be responsible for providing metering data to the ISO for settlement purposes.¹³ The Compliance Order further directed ISO-NE to:

⁹ See generally Compliance Filing at pp. 8-42.

¹⁰ See Compliance Order, Ordering Clause (B). Subsequent to the issuance of the Compliance Order, NEPOOL requested a limited extension of time, to May 9, 2023 for the submission of the 60-day further compliance filing to allow for consideration of further revisions through the NEPOOL stakeholder process. The extension was granted by Notice on April 11, 2023.

¹¹ Host Participant or Host Utility, are used interchangeably in the ISO’s Tariff and are defined in Section I.2.2 – Definitions as “a Market Participant or a Governance Participant transmission or distribution provider that reconciles the loads within the metering domain with OP-18 compliant metering.”

¹² An Assigned Meter Reader is defined in Section I.2.2 – Definitions as the entity that “reports to the ISO the hourly and monthly MWh associated with the Asset. These MWh are used for settlement. The Assigned Meter Reader may designate an agent to help fulfill its Assigned Meter Reader responsibilities; however, the Assigned Meter Reader remains functionally responsible to the ISO.”

¹³ Compliance Order at P 169, 171 (citing Order No. 2222 at P 266 (“[T]he distributed energy resource aggregator, not the individual distributed energy resources in the aggregation, is the single point of contact with the RTO/ISO, responsible for managing, dispatching, metering, and settling the individual distributed energy resources in its aggregation. We further clarify here that the distributed energy resource aggregator is also the entity responsible for providing any required metering and telemetry information to the RTO/ISO.”)).

[P]ropose Tariff revisions that designate the DER Aggregator as the entity responsible for providing any required metering information to ISO-NE; and (2) if necessary, establish protocols for sharing meter data that minimize costs and other burdens and address concerns raised with respect to privacy and cybersecurity.¹⁴

The ISO requested rehearing of this determination, arguing that the changes required by the Compliance Order would have the effect of excluding the Host Utility from the flow of metering data for DERAs to the ISO and that such a process would (1) contravene the ISO-NE Transmission Operating Agreement (“TOA”) pursuant to which the New England PTOs (*i.e.*, the Host Utilities) retained metering function responsibility; (2) conflict with other Order No. 2222 metering requirements; and (3) would result in the imposition of unnecessary burdens on DER Aggregators in contrast to the benefits provided by the ISO’s proposed Tariff rules.¹⁵

While the ISO’s Request for Rehearing remained pending, in its May 2023 Compliance Filing, the ISO stated that it could not, at that time, provide further Tariff revisions to shift the responsibility for submitting metering data for DERAs due to the pending rehearing request and the uncertainty regarding allowable metering configurations for DERAs.¹⁶ The ISO, therefore, requested in the May Compliance Filing that the Commission allow the ISO to propose additional Tariff revisions, if required, or otherwise provide an informational filing detailing the amount of time needed to undertake additional design efforts with respect to reporting metering data to the ISO, within 90 days of the Commission issuing an order resolving the pending rehearing requests and the metering configuration issues discussed herein.¹⁷

On October 6, 2023, the Commission issued an Order on the ISO’s Rehearing Request.¹⁸ The Rehearing Order clarified that “metering data may come from or flow through distribution utilities if ISO-NE coordinates with distribution utilities and relevant electric retail regulatory authorities to establish protocols for sharing such metering data and explains how such protocols minimize costs and other burdens and address concerns raised with respect to privacy and cybersecurity.”¹⁹

¹⁴ Compliance Order at P 162.

¹⁵ See *ISO New England Inc.*, Request for Rehearing, Docket No. RM22-983 (March 31, 2023) (“Request for Rehearing”).

¹⁶ *ISO New England Inc.*, Revisions to ISO New England Inc. Transmission, Markets and Services Tariff In Further Compliance with Order No. 2222 and Request for Extension of Compliance Deadline, Docket No. ER22-983-000 (May 9, 2023) (“May Compliance Filing”) at p 25.

¹⁷ *Id.* at pp. 26-27.

¹⁸ *ISO New England Inc.*, 185 FERC ¶ 61,021 at PP 22-24 (2023) (“Rehearing Order”).

¹⁹ *Id.* at P 24.

In recognition of this clarification, the Commission's October 25, 2023 Order on Compliance Filing directed that ISO-NE submit a further compliance filing within 90 days to comply with the directives of the March 1, 2023 Compliance Order regarding the submission of DERA meter data.²⁰ Specifically, the Further Compliance Order directed ISO-NE revise its Tariff to:

[D]esignate the DER Aggregator as the entity responsible for providing any required metering information to ISO-NE, and require that each DER Aggregator maintain and submit aggregate settlement data for the DERA," and that "to the extent that ISO-NE proposes...that metering data come from or flow through distribution utilities...[that the ISO]...coordinate with distribution utilities and relevant electric retail regulatory authorities to establish protocols for sharing such metering data, and explain how such protocols minimize costs and other burdens and address concerns raised with respect to privacy and cybersecurity."²¹

Most relevant to the instant filing, the Further Compliance Order also directed that the ISO revise its Tariff "to include the meter data submission deadline for settlement or explain why such Tariff revisions are not necessary."²²

On January 31, 2024, the ISO made a further compliance filing, which proposed to include the following language in Section III.6.4(f):

Where a Distributed Energy Resource Aggregator designates itself or an agent acting on its behalf as the Assigned Meter Reader for its Distributed Energy Resource Aggregation, *it shall provide all data necessary for settlement to the Host Participant Assigned Meter Reader and the ISO, as appropriate, on the same schedule applicable to other Assigned Meter Readers as described in Section 5.3 of Manual M-28 - Market Rule 1 Accounting.* (emphasis added)

The January 31 Compliance Filing also explained that the relevant meter data submission responsibilities and deadlines are currently specified in Section 5 of Manual M-28,²³ which states in relevant part that:

If the Assigned Meter Reader is not the Host Participant, for Real-Time Energy Market settlement purposes... [t]he Assigned Meter Reader provides a copy of the Directly Metered Asset data, that will be supplied to the ISO, to the Host Participant

²⁰ *ISO New England Inc.*, 185 FERC ¶ 61,095 at P 34 (2023) ("Further Compliance Order").

²¹ *Id.*

²² *Id.* at P 79.

²³ *ISO New England*, Manual M-28, Section 5.3(1)(b)(ii), https://www.iso-ne.com/static-assets/documents/2023/04/manual_28_market_rule_1_accounting_rev64_2023_04_06.pdf.

by 0800 of the next Business Day following the Operating Day or at a later time as mutually agreed.²⁴

In the April Compliance Order, the Commission rejected the ISO's proposed revisions to Section III.6.4(f) of the Tariff and directed the ISO to explicitly include in the Tariff the meter data submission deadline applicable to DER Aggregators.²⁵ The Commission stated that "ISO-NE fails to address adequately the Commission's finding in the November 2 Order that the meter data submission deadline is a key component of metering practices *for DER Aggregators* that should be included in the basic description of metering practices in the Tariff."²⁶ (emphasis added) As discussed in detail below, the ISO is proposing a further revision to Section III.6.4(f) of the Tariff in order to include this deadline.

III. DESCRIPTION OF THE ADDITIONAL COMPLIANCE REVISIONS

The April Compliance Order requires that the ISO submit Tariff revisions specifying the meter data submission deadline for DERAs.²⁷ Consistent with this directive, the ISO proposes to revise Section III.6.4(f) as follows:

Where a Distributed Energy Resource Aggregator designates itself or an agent acting on its behalf as the Assigned Meter Reader for its Distributed Energy Resource Aggregation, it shall provide, or cause to be provided, all data necessary for settlement (1) to the Host Participant Assigned Meter Reader by 0800 of the next Business Day following the Operating Day or at a later time as mutually agreed, and (2) to the ISO by 1300 on the second Business Day after the Operating Day.

The proposed revision applies to a DER Aggregator that designates itself, or an agent acting on its behalf, as the Assigned Meter Reader of its DERA the same metering data submission deadlines as those applied to other Assigned Meter Readers as specified in Section 5.3 of Manual M-28. This revision fully meets the April Compliance Order directives by specifying the meter data submission deadlines for DER Aggregators in the Tariff. Since, the proposed language subjects a DER Aggregator that designates itself, or an agent, as its Assigned Meter Reader to the same meter data submission deadlines applicable to other Assigned Meter Readers, it eliminates the need for changes in the ISO's market settlement constructs.

²⁴ *Id.*

²⁵ April Compliance Order at P 13.

²⁶ *Id.*

²⁷ Further Compliance Order at P 79.

IV. STAKEHOLDER PROCESS

The Metering Data Submission Revisions were reviewed and considered by the NEPOOL Markets Committee in May 2024. At its May 7-8, 2024 meeting, the Markets Committee, based on a show of hands, voted in favor of recommending that the Participants Committee support the Additional Compliance Revisions.²⁸ Due to the compliance deadline, the Participants Committee has not taken action, but the Participants Committee expects to consider the revisions at its June 25 meeting as part of its Consent Agenda.²⁹ NEPOOL has informed the ISO that it will file comments in this proceeding after that meeting to explain the Participant Committee's vote outcome.

V. REQUESTED EFFECTIVE DATE

The ISO requests that the Commission accept the Metering Data Submission Revisions effective November 1, 2026, consistent with the effective date of the previously accepted energy and ancillary service market rules for DERAs.

VI. ADDITIONAL SUPPORTING INFORMATION

Section 35.13 of the Commission's regulations generally requires public utilities to file certain cost and other information related to an examination of traditional cost-of service rates. However, the ISO Tariff changes submitted herewith do not modify a traditional "rate." Therefore, to the extent necessary, the Filing Parties request waiver of Section 35.13 of the Commission's regulations.³⁰ Notwithstanding this request for waiver, the Filing Parties submit the following additional information in substantial compliance with relevant provisions of Section 35.13 of the Commission's regulations:

35.13(b)(1) – Materials included herewith are as follows:

- This transmittal letter;
- Blacklined Tariff sections reflecting the Metering Data Submission Revisions discussed in this filing;

²⁸ The Markets Committee supported the revisions, with two oppositions in the Alternative Resource Sector and two abstentions in the End User Sector.

²⁹ The Consent Agenda for a Participants Committee meeting, similar to the Consent Agenda for a Commission open meeting, is a group of actions (each recommended by a Technical Committee or subgroup established by the Participants Committee) to be taken by the Participants Committee through approval of a single motion at a meeting. Although voted as a single motion, all recommendations voted on as part of the Consent Agenda are deemed to have been voted on individually and independently.

³⁰ 18 C.F.R. § 35.13 (2009).

- Clean revised Tariff sections reflecting the Metering Data Submission Revisions discussed in this filing; and
- List of governors and utility regulatory agencies in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont to which a copy of this filing is being sent electronically.

35.13(b)(2) – As noted above, the ISO requests that this filing become effective as of November 1, 2026.

35.13(b)(3) – Pursuant to Section 17.11(e) of the Participants Agreement, Governance Participants are being served electronically rather than by paper copy. The names and addresses of the Governance Participants are posted on the ISO's website at <https://www.iso-ne.com/participate/participant-asset-listings/directory?id=1&type=committee>. An electronic copy of this transmittal letter and the accompanying materials has also been sent to the governors and electric utility regulatory agencies for the six New England states that comprise the New England Control Area, and to NECPUC. The names and addresses of these governors and regulatory agencies are shown in the above-referenced list, which is included in this filing. In accordance with Commission rules and practice, there is no need for the Governance Participants or the entities identified in the above-referenced list to be included on the Commission's official service list in the captioned proceeding unless such entities become intervenors in this proceeding.

35.13(b)(4) – A description of the materials submitted pursuant to this filing is contained in this Section VI.

35.13(b)(5) – The reasons for this filing are discussed in Sections II and III of this transmittal letter.

35.13(b)(6) – As explained above, the Tariff revisions for which the ISO holds Section 205 rights reflect the results of the Participant Processes required by the Participants Agreement and reflect the support of the Participants Committee.

35.13(b)(7) – The Filing Parties have no knowledge of any relevant expenses or costs of service that have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

35.13(b)(8) – A form of notice and electronic media are no longer required for filings in light of the Commission's Combined Notice of Filings notice methodology.

35.13(c)(1) – The Tariff changes herein do not modify a traditional "rate." The statement required under this Commission regulation is not applicable to this filing.

35.13(c)(2) – The ISO does not provide services under other rate schedules that are similar to the wholesale, resale and transmission services it provides under the ISO Tariff.

35.13(c)(3) – No specifically assignable facilities have been or will be installed or modified in connection with the revision submitted herein.

VII. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the Commission accept the Metering Data Submission Revisions, as fully compliant with the April Compliance Order, to become effective as of November 1, 2026.

Respectfully submitted,

By: /s/ Graham Jesmer

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Holyoke, Massachusetts this 10th day of June, 2024.

/s/ Julie Horgan

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III.6 Distributed Energy Resource Aggregations

A Distributed Energy Resource Aggregation may participate in the New England Markets as described below. A Distributed Energy Resource Aggregation must comply with all applicable registration, metering, and accounting rules in this section.

III.6.1 Participation Requirements

An aggregation of Distributed Energy Resources that satisfies the requirements of Section III.6 may participate in the New England Markets as a Distributed Energy Resource Aggregation. A Distributed Energy Resource Aggregation shall:

- (a) comprise one or multiple facilities at one or more points of interconnection or Retail Delivery Points;
- (b) have regulation capability, energy injection capability, or combined demand reduction capability and energy injection capability of at least 0.1 MW;
- (c) be metered in accordance with Section III.6.4;
- (d) be registered pursuant to Section III.6.7;
- (e) participate in the wholesale markets as, and subject to all requirements applicable to a Generator Asset, Alternative Technology Regulation Resource, Continuous Storage Facility, Binary Storage Facility, Demand Response Resource, Settlement Only Distributed Energy Resource Aggregation, or Demand Response Distributed Energy Resource Aggregation;
 - i. A Distributed Energy Resource Aggregation may participate as a Continuous Storage Facility or Binary Storage Facility to the extent the Distributed Energy Resource Aggregation as a whole is able to comply with all the requirements of a Continuous Storage Facility or Binary Storage Facility as stated in Sections III.1.10.6(b), (c), (d), and (e) respectively, regardless of whether any or all of the individual Distributed Energy Resources comprising the Distributed Energy Resource Aggregation meet the definition of Energy Storage Facility as defined in Section III.1.10.6.
- (f) not be located in the metering domain of a Host Utility that distributed 4 million MWh or less in the previous fiscal year, unless the relevant electric retail regulatory authority that regulates such Host Utility has authorized customers of such Host Utility to participate in Distributed Energy Resource Aggregations; and
- (g) meet the locational rules specified Section III.6.2.

III.6.2 Locational Requirements

A Distributed Energy Resource Aggregation must meet the following locational requirements.

- (a) For a Distributed Energy Resource Aggregation participating as an Alternative Technology Regulation Resource or a Demand Response Resource, all associated Distributed Energy Resources shall be located in a single DRR Aggregation Zone.
- (b) For a Distributed Energy Resource Aggregation participating as a Generator Asset, Binary Storage Facility, Continuous Storage Facility, Settlement Only Distributed Energy Resource Aggregation, or Demand Response Distributed Energy Resource Aggregation, all associated Distributed Energy Resources shall be located within both a single DRR Aggregation Zone and a single Host Utility metering domain.
- (c) A Distributed Energy Resource Aggregation shall be settled at the DRR Aggregation Zone Node price, except where a single Distributed Energy Resource or a group of Distributed Energy Resources can inject greater than or equal to 5 MW at a single transmission Node, in which case, they are prohibited from aggregating with facilities at other Nodes, and will be settled at the single transmission Node price, not at the DRR Aggregation Zone Node price.
- (d) The ISO shall determine that all of the Distributed Energy Resources in a Distributed Energy Resource Aggregation are located in the same DRR Aggregation Zone. For Distributed Energy Resources in a Distributed Energy Resource Aggregation with energy injection capability or demand reduction capability of 1 MW or greater, the ISO's determination shall be based on the Host Utility's evaluation of the transmission node that will serve the Distributed Energy Resource.

III.6.3 Distributed Energy Resource Size Requirements

Individual Distributed Energy Resources participating in a Distributed Energy Resource Aggregation must meet the following size requirements.

- (a) A Distributed Energy Resource with overall injection capability of 5 MW or greater that participates in the New England Markets through a Distributed Energy Resource Aggregation must participate as a single facility Distributed Energy Resource Aggregation and be modeled and priced at a single transmission Node.
- (b) If a group of Distributed Energy Resources can inject greater than or equal to 5 MW at a single transmission Node, this group of Distributed Energy Resources cannot aggregate with facilities at other Nodes. This group of Distributed Energy Resources may participate as a Distributed Energy Resource Aggregation that is modeled and priced at the single transmission Node.
- (c) For a Distributed Energy Resource Aggregation with multiple Distributed Energy Resources participating as a Generator Asset, Binary Storage Facility, or Continuous Storage Facility, each

participating Distributed Energy Resource in the aggregation must have injection capability of less than 5 MW.

- (d) For a Distributed Energy Resource Aggregation participating as a Demand Response Resource, the size requirements in Section III.8 shall apply.
- (e) For a Distributed Energy Resource Aggregation participating as a Demand Response Distributed Energy Resource Aggregation, the size requirements in III.6.5(b) shall apply.
- (f) For a Distributed Energy Resource Aggregation participating as a Settlement Only Distributed Energy Resource Aggregation, the size requirements in III.6.6 shall apply.
- (g) For a Distributed Energy Resource Aggregation participating as an ATRR, the size requirements in Section III.14 shall apply.

III.6.4 Metering and Telemetry Requirements

Distributed Energy Resource Aggregations must meet the following metering and telemetry requirements.

- (a) Distributed Energy Resource Aggregations participating as a Generator Asset, Binary Storage Facility, or Continuous Storage Facility, must comply with the metering and telemetry requirements in Sections III.3.2.1 and III.3.2.2.
- (b) Distributed Energy Resource Aggregations participating as an Alternative Technology Regulation Resource must comply with the metering and telemetry requirements in Section III.14.2.
- (c) Distributed Energy Resource Aggregations participating as Demand Response Resources or Demand Response Distributed Energy Resource Aggregations must comply with the metering and telemetry requirements in Section III.3.2.2. The metering and communication equipment associated with each participating Distributed Energy Resource must meet the requirements in Section III.3.2.2 and ISO New England Operating Procedure No. 18, Metering and Telemetering.
- (d) Metering for each Distributed Energy Resource participating in a Distributed Energy Resource Aggregation shall meet all applicable state and Host Utility requirements and be located at, a Retail Delivery Point, or point of interconnection as applicable. A Distributed Energy Resource's point of interconnection may be located behind a Retail Delivery Point to the extent that the pertinent Host Participant Assigned Meter Reader can accommodate such a configuration.
- (e) If a Distributed Energy Resource's point of interconnection is located behind a Retail Delivery Point it shall be reported such that its output or load does not impact the load reported for the Retail Delivery Point. A Distributed Energy Resource Aggregator may only propose a metering location behind a Retail Delivery Point if the Host Utility confirms in writing to the Distributed Energy Resource Aggregator that the appropriate metering and associated system upgrades are in place to support load and generation reporting and any necessary reconstitution. Proof of such

written confirmation from the Host Utility should be provided as part of the attestation as referenced in Section III.6.7(c)(i)2.

- (f) A Distributed Energy Resource Aggregator, as the entity responsible for providing any required metering information to the ISO, may designate itself, an agent acting on its behalf, or the Host Utility to act as the Assigned Meter Reader for Distributed Energy Resource Aggregations that include Generator Assets or Load Assets. Where the Distributed Energy Resource Aggregator designates itself or an agent acting on its behalf as the Assigned Meter Reader, the Distributed Energy Resource Aggregator or its agent shall:

- 1) be subject to all obligations applicable to an Assigned Meter Reader that is not the Host Participant, as detailed in the ISO's Tariff and other Operating Documents, including, but not limited to Operating Procedure 18 – Metering and Telemetry Criteria and Manual M-28 – Market Rule 1 Accounting, where such requirements may differ for Distributed Energy Resource Aggregations that include Generator Assets or Load Assets, and which may include adjustments for losses and/or residual unmetered load as appropriate; and
- 2) enter into applicable coordination agreements with the relevant Host Utility, which may include, but need not be limited to agreements required by the Host Utility or the relevant electric retail regulatory authority regarding:
 - i) specific requirements related to adjustments for losses and/or residual unmetered load for any Load Asset metering data;
 - ii) coordination of data transmittal; and
 - iii) protection of retail customer information.

Where a Distributed Energy Resource Aggregator designates itself or an agent acting on its behalf as the Assigned Meter Reader for its Distributed Energy Resource Aggregation, it shall provide or cause to be provided, all data necessary for settlement (1) to the Host Participant Assigned Meter Reader by 0800 of the next Business Day following the Operating Day or at a later time as mutually agreed, and (2) to the ISO by 1300 on the second Business Day after the Operating Day ~~and the ISO, as appropriate, on the same schedule applicable to other Assigned Meter Readers as described in Section 5.3 of Manual M-28 – Market Rule 1 Accounting~~. If the data provided includes any Profiled Load Asset data, as determined by the Host Participant, the Host Participant Assigned Meter Reader shall submit the Profiled Load Asset meter data directly to the ISO for settlement after appropriate adjustment for losses and/or residual unmetered load.

- (g) The Distributed Energy Resource Aggregator shall retain metering data for each participating Distributed Energy Resource for a period of six years for purposes of auditing.

III.6.5 Additional Requirements For Demand Response Distributed Energy Resource Aggregations

In addition to the rules applicable to all Distributed Energy Resource Aggregations, the following rules apply to Demand Response Distributed Energy Resource Aggregations. A Demand Response Distributed Energy Resource Aggregation allows Distributed Energy Resources with demand reduction capability, Distributed Energy Resources with energy injection capability and Distributed Energy Resources with energy withdrawal capability to participate in the wholesale markets as a single resource.

- (a) A Demand Response Distributed Energy Resource Aggregation must include Distributed Energy Resources with both demand reduction capability and energy injection capability and may include Distributed Energy Resources with energy withdrawal capability.
- (b) Size Requirements. Individual Distributed Energy Resources participating in a Demand Response Distributed Energy Resource Aggregation must meet the following size requirements:
 - (i) An individual Distributed Energy Resource with a Maximum Deviation Capability or ability to inject greater than or equal to 5 MW may not be registered as a component of a Demand Response Distributed Energy Resource Aggregation if its maximum energy injection capability is greater than its Maximum Facility Load. Such a Distributed Energy Resource must be the only facility associated with a Demand Response Distributed Energy Resource Aggregation and shall be modeled and priced at the transmission Node.
 - (ii) An individual Distributed Energy Resource with a Maximum Deviation Capability and maximum energy injection capability less than 5 MW may participate in a Demand Response Distributed Energy Resource Aggregation with other facilities located within the same DRR Aggregation Zone and metering domain. Such a Demand Response Distributed Energy Resource Aggregation shall be modeled and priced at the DRR Aggregation Zone Node.
 - (iii) If a group of Distributed Energy Resources has a Maximum Deviation Capability of, or can inject greater than or equal to 5 MW at a single transmission Node, this group of Distributed Energy Resources cannot aggregate with facilities at another Node. This group of Distributed Energy Resources may participate as a Demand Response Distributed Energy Resource Aggregation that is modeled and priced at the single transmission Node.

- (c) **Baseline, Offer Requirements and Related Threshold Requirements.** For each Demand Response Distributed Energy Resource Aggregation:
- (i) The ISO shall establish a baseline for each Distributed Energy Resource in the same manner as prescribed for a Demand Response Asset in Section III.8.2.
 - (ii) The Distributed Energy Resource Aggregator shall submit a Baseline Deviation Offer pursuant to Section III.1.10.1A(l) that reflects the aggregation's ability to deviate from its normal operational level.
 - (iii) Its Baseline Deviation Offer shall be subject to the Demand Reduction Threshold calculated pursuant to Section III.1.10.1A(f)
 - (iv) It may inject energy outside of dispatch intervals, which will be settled consistent with the rules for Settlement Only Resources.
 - (v) It may withdraw energy outside of dispatch intervals, which will be settled consistent with the rules for Load Assets.
- (d) **Performance Calculation.** The ISO shall calculate a Demand Response Distributed Energy Resource Aggregation's performance when it is dispatched. Such performance shall be the sum of the performance of each constituent Distributed Energy Resource. The ISO shall calculate the performance of each Distributed Energy Resource in the same manner as prescribed for a Demand Response Asset in Section III.8.4.

III.6.6 Additional Requirements For Settlement Only Distributed Energy Resource Aggregations

A Settlement Only Distributed Energy Resource Aggregation is a Distributed Energy Resource Aggregation that may include Distributed Energy Resources with non-dispatchable energy injection capability and/or non-dispatchable energy withdrawal capability. A Settlement Only Distributed Energy Resource Aggregation shall comply with all Market Rules applicable to Settlement Only Resources and the following additional rules.

- (a) A Settlement Only Distributed Energy Resource Aggregation may submit a Supply Offer and/or Demand Bid in the Day-Ahead Energy Market in accordance with the requirements in Section III.1.10.1A(m).
- (b) There is no maximum size limit for a Settlement Only Distributed Energy Resource Aggregation, provided each constituent Distributed Energy Resource would otherwise be eligible to register as a Settlement Only Resource pursuant to OP-14.

III.6.7 Coordination of Registration and Modification

The process of coordinating the registration and activation for participation in the New England Markets between the ISO, the Distributed Energy Resource Aggregator and the Host Utility, regardless of the participation model chosen, includes four stages: 1) Initial Notification of Intent to Register a Distributed Energy Resource Aggregation; 2) Eligibility Confirmation; 3) Registration and Activation; and 4) Updates to an Existing Distributed Energy Resource Aggregation Registration. Completion of the Distributed Energy Resource Aggregation registration process requires that the Distributed Energy Resource Aggregator, Host Utility (or its agent) and ISO meet the following requirements for each stage.

(a) Initial Notification

(i) Distributed Energy Resource Aggregator shall make an initial notification to both the ISO and the Host Utility (or the Host Utility's Agent) of its intent to register a Distributed Energy Resource Aggregation. Such notification shall include the information required by applicable ISO New England Manuals, including, but not limited to: the retail billing account(s) of the individual Distributed Energy Resource(s) participating in the aggregation, information regarding the location, anticipated size, technologies to be included, markets in which participation is planned, information required by the Host Utility Tariff and Terms and Conditions, and the participation model that the Distributed Energy Resource Aggregation intends to use for the Distributed Energy Resource Aggregation; interconnection agreement(s) for each participating Distributed Energy Resource, if required under state law; and an anticipated date to begin energy and/or ancillary service market participation.

(b) Eligibility Confirmation. The Host Utility (or its agent) shall review each Distributed Energy Resource's eligibility to participate in a Distributed Energy Resource Aggregation and confirm the Aggregator's eligibility to register the proposed Distributed Energy Resource Aggregation in the manner established in this subsection. The time period for such review shall begin when the Host Utility or its agent receives the initial notification from the Distributed Energy Resource Aggregator and shall not exceed 60 calendar days. The Host Utility (or its agent) shall provide written notice to the ISO and the Distributed Energy Resource Aggregator of the eligibility confirmation, in accordance with the eligibility criteria described in this subsection. The eligibility confirmation shall be provided by the Host Utility or its agent to the appropriate relevant electric retail regulatory authority upon request. If the ISO does not receive timely notification from the Host Utility or its agent, then the ISO will assume that the operation of the Distributed Energy Resource will not have a material reliability and/or safety impact on the

applicable distribution system and shall be eligible to register with the proposed Distributed Energy Resource Aggregation.

(c)

- (i) In order to verify eligibility, the Host Utility or its agent shall, to the extent practicable based on the representations made by the Distributed Energy Resource Aggregator in the initial notification or through information otherwise in the Host Utility's (or its agent's) possession:
 - 1. confirm that each Distributed Energy Resource's metered net consumption or injection of energy will not be included in another Load Asset (if the Distributed Energy Resource Aggregation includes load) or Generator Asset.
 - 2. confirm, based on the representations made by the Distributed Energy Resource Aggregator that no individual Distributed Energy Resource (as identified by any retail billing account record of the Host Utility) is participating in a retail program that prohibits it from providing the requested service in New England Markets.
 - 3. confirm based on the representations made by the Distributed Energy Resource Aggregator that the proposed operation of each Distributed Energy Resource as part of the proposed Distributed Energy Resource Aggregation has appropriate interconnection and/or operating agreements in place with the Host Utility applicable to its technology and size.
 - 4. determine whether the Distributed Energy Resource Aggregation may pose significant risks, or may require further study to evaluate the potential significance of the risks, to the safe and reliable operation of the distribution system based on analysis of relevant risk factors, such as overloads, voltage, stability, short circuit interrupting capability, flicker, equipment operation frequency coordination, and contingency analysis.
 - 5. consider whether the proposed operation of any Distributed Energy Resource participating in a proposed Distributed Energy Resource Aggregation, or the Distributed Energy Resource Aggregation as a whole, imposes a need for distribution system upgrades to avoid safety and reliability impacts and, if so, confirm that the Distributed Energy Resource Aggregator has self-certified that such upgrades have been completed or will be completed before the Distributed Energy Resource desired activation date.

6. confirm that all the Distributed Energy Resources are within the Host Utility's metering domain.
 7. confirm that the net injection and consumption capability of the Distributed Energy Resources participating in the Distributed Energy Resource Aggregation do not exceed the capabilities as authorized by any associated interconnection agreements.
- (ii) For a Distributed Energy Resource Aggregation connecting to a Host Utility that served less than or equal to 4 million MWh of load in the previous fiscal year, the Host Utility (or its agent) shall confirm that the relevant electric retail regulatory authority has authorized customers of the Host Utility to participate in Distributed Energy Resource Aggregations.
 - (iii) If the Host Utility (or its agent) confirms that the Distributed Energy Resource Aggregation is eligible in full or in part, the Distributed Energy Resource Aggregator shall provide a finalized list to the ISO and the Host Utility (or its agent) of the Distributed Energy Resources that have been found to be eligible for participation in the Distributed Energy Resource Aggregation, the participation model that the Distributed Energy Resource Aggregation intends to use, and the New England Markets in which the Distributed Energy Resource Aggregation plans to participate.
 - (iv) If the Host Utility (or its agent) confirms that the Distributed Energy Resource Aggregation is not eligible in full or in part, the Host Utility (or its agent) shall provide a written notice to the ISO and the Distributed Energy Resource Aggregator describing the eligibility criteria that were not met for any Distributed Energy Resource.
 - (v) In the event the Host Utility (or its agent) confirms that a Distributed Energy Resource Aggregation has not fulfilled the requirements of this subsection to be activated for participation in the New England Markets, and the Distributed Energy Resource Aggregator disputes this confirmation, the Distributed Energy Resource Aggregation may seek dispute resolution in accordance with Section I.6 of the Tariff if the dispute falls within ISO's authority or is subject to the Tariff or in a process established by the relevant electric retail regulatory authority if the dispute falls within the relevant electric retail regulatory authority's purview and the relevant electric retail regulatory authority has established such a process. Where the relevant electric retail regulatory authority has not established such a process, the Distributed Energy Resource Aggregator may seek resolution under Section I.6 of the Tariff. Notwithstanding the foregoing, any disputes regarding whether the Distributed Energy Resource Aggregator has appropriate

contractual rights to offer a Distributed Energy Resource as part of a Distributed Energy Resource Aggregation in the New England Markets shall be resolved in the manner established in such contract, or otherwise by a court of competent jurisdiction as applicable.

- (vi) In the event the ISO determines that a Distributed Energy Resource Aggregation is ineligible to participate in the New England Markets for reasons that are not related to the Host Utility (or its agent's) review, the Distributed Energy Resource Aggregator may seek resolution in accordance with Section I.6 of the Tariff.

(d) Registration/Activation

- (i) In order to complete the registration and activation of a DERA the DER Aggregator shall:
 - 1. Provide both the ISO and the Host Utility (or its agent) with a desired activation date, once eligibility has been confirmed.
 - 2. Provide the information required by applicable ISO New England Manuals, as well as 1) an attestation, in a form prescribed by the ISO, stating that all participating Distributed Energy Resources are fully compliant with the tariffs and operating procedures of the distribution utilities and the rules and regulations of any relevant electric retail regulatory authority, including the terms of any state interconnection agreements, and that the Distributed Energy Resource Aggregator retains the rights to offer the individual Distributed Energy Resource in New England Markets; and 2) confirmation in writing to the ISO and Host Utility (or its agent) that all Distributed Energy Resources in the Distributed Energy Resource Aggregation have been deemed eligible under subsection (b) of this section; and that the required metering and telemetry is in place, to meet the ISO requirements for participation in the planned markets.
- (ii) Prior to activation, the ISO must receive confirmation from the Host Utility (or its agent) that the Distributed Energy Resource Aggregator has met all applicable requirements with respect to metering and telemetry to enable the Host Utility or Assigned Meter Reader to include the Distributed Energy Resource Aggregation's metering in the appropriate Load Asset and metering domain.
- (iii) Distributed Energy Resources participating in a Distributed Energy Resource Aggregation may provide both retail and wholesale services to the extent such dual participation is allowed under state law or regulation, the Distributed Energy Resource Aggregator retains the rights to such services from the owner of the Distributed Energy

Resource, and so long as the Distributed Energy Resource Aggregation is able to comply with all requirements under the ISO Tariff.

- (e) Updates/Modifications to Existing Distributed Energy Resource Aggregation
 - (i) When a Distributed Energy Resource is added to or removed from an existing Distributed Energy Resource Aggregation, the Distributed Energy Resource Aggregator shall update the Distributed Energy Resource Aggregation's registration information. Such updates shall include: the information required by applicable ISO New England Manuals, sufficient to confirm that any newly added Distributed Energy Resources are eligible for participation; notification to the ISO and the Host Utility (or its agent) by the Distributed Energy Resource Aggregator of any Distributed Energy Resource being removed from the aggregation; verification that any required metering is in place for the reconfigured Distributed Energy Resource Aggregation; and an updated list of participating Distributed Energy Resources and the updated performance capabilities of the aggregation to be reflected in the aggregation's registration information.
 - (ii) The Host Utility (or its agent) shall have up to 60 days to confirm eligibility and review any impacts associated with Distributed Energy Resources that the Distributed Energy Resource Aggregator is proposing to add to or remove from an existing Distributed Energy Resource Aggregation.
 - (iii) Changes to the Distributed Energy Resources participating in a Distributed Energy Resource Aggregation shall become effective in the manner stated in Manual M-RPA.

III.6.8 Operational Coordination

The responsibilities related to the coordination of operations of a Distributed Energy Resource Aggregation between the Distributed Energy Resource Aggregator, the ISO, and the Host Utility are as follows:

- (a) The Distributed Energy Resource Aggregator shall: operate Distributed Energy Resources in a manner consistent with the limitations and operating orders established by the Host Utility; confer with the applicable Host Utility on a periodic basis to ensure available distribution service exists to operate its Distributed Energy Resources consistent with its New England Market obligations; submit outage requests for each Distributed Energy Resource Aggregation as necessary and to the extent required by ISO Operating Documents, in order to reflect known distribution system

constraints or limitations that reduce the overall capability of the Distributed Energy Resource Aggregation; as required, account for any known limitations of the distribution system to which the Distributed Energy Resources are connected in its Offer Data for the Distributed Energy Resource Aggregation including restrictions that have been placed directly on the Distributed Energy Resource Aggregation by the Host Utility in the form of an override of an ISO Dispatch Instruction; determine a Distributed Energy Resource-level operating plan to be provided to the Host Utility for analysis, subject to the requirements of each Host Utility.

- (b) The Distributed Energy Resource Aggregator shall have a Designated Entity or Demand Designated Entity, as applicable, for each of its Distributed Energy Resource Aggregations in accordance with the provisions set forth in ISO Operating Procedures. Designated Entities and Demand Designated Entities for Distributed Energy Resource Aggregations shall comply with the requirements of each Host Utility and/or relevant electric retail regulatory authority as applicable.
- (c) In the event that the Host Utility identifies conditions on the distribution system that result in actual or anticipated limitations on the operation of individual Distributed Energy Resources or Distributed Energy Resource Aggregations, the Host Utility shall notify the relevant Distributed Energy Resource Aggregator as soon as practicable.
- (d) The Host Utility may temporarily override the ISO's dispatch of a Distributed Energy Resource Aggregation. Such override shall only occur in circumstances where needed to maintain the reliable and safe operation of the distribution system.
- (e) Failure of a Distributed Energy Resource Aggregation to follow an ISO Dispatch Instruction due to a Host Utility override does not excuse the Distributed Energy Resource Aggregator from any applicable charges (including any penalties) to which the Distributed Energy Resource Aggregator is subject under the terms of Sections III.3.2.1(g), III.3.2.1(h), III.3.2.6, III.9.7, III.13.7.2, III.F.3.1.2(i), and III.F.3.2 of the Tariff.
- (f) The ISO shall coordinate with the applicable Host Utility to avoid conflicting operational directives, which may include but is not limited to sharing Day-Ahead Energy Market results and Real-Time Dispatch Instructions.

III.6 Distributed Energy Resource Aggregations

A Distributed Energy Resource Aggregation may participate in the New England Markets as described below. A Distributed Energy Resource Aggregation must comply with all applicable registration, metering, and accounting rules in this section.

III.6.1 Participation Requirements

An aggregation of Distributed Energy Resources that satisfies the requirements of Section III.6 may participate in the New England Markets as a Distributed Energy Resource Aggregation. A Distributed Energy Resource Aggregation shall:

- (a) comprise one or multiple facilities at one or more points of interconnection or Retail Delivery Points;
- (b) have regulation capability, energy injection capability, or combined demand reduction capability and energy injection capability of at least 0.1 MW;
- (c) be metered in accordance with Section III.6.4;
- (d) be registered pursuant to Section III.6.7;
- (e) participate in the wholesale markets as, and subject to all requirements applicable to a Generator Asset, Alternative Technology Regulation Resource, Continuous Storage Facility, Binary Storage Facility, Demand Response Resource, Settlement Only Distributed Energy Resource Aggregation, or Demand Response Distributed Energy Resource Aggregation;
 - i. A Distributed Energy Resource Aggregation may participate as a Continuous Storage Facility or Binary Storage Facility to the extent the Distributed Energy Resource Aggregation as a whole is able to comply with all the requirements of a Continuous Storage Facility or Binary Storage Facility as stated in Sections III.1.10.6(b), (c), (d), and (e) respectively, regardless of whether any or all of the individual Distributed Energy Resources comprising the Distributed Energy Resource Aggregation meet the definition of Energy Storage Facility as defined in Section III.1.10.6.
- (f) not be located in the metering domain of a Host Utility that distributed 4 million MWh or less in the previous fiscal year, unless the relevant electric retail regulatory authority that regulates such Host Utility has authorized customers of such Host Utility to participate in Distributed Energy Resource Aggregations; and
- (g) meet the locational rules specified Section III.6.2.

III.6.2 Locational Requirements

A Distributed Energy Resource Aggregation must meet the following locational requirements.

- (a) For a Distributed Energy Resource Aggregation participating as an Alternative Technology Regulation Resource or a Demand Response Resource, all associated Distributed Energy Resources shall be located in a single DRR Aggregation Zone.
- (b) For a Distributed Energy Resource Aggregation participating as a Generator Asset, Binary Storage Facility, Continuous Storage Facility, Settlement Only Distributed Energy Resource Aggregation, or Demand Response Distributed Energy Resource Aggregation, all associated Distributed Energy Resources shall be located within both a single DRR Aggregation Zone and a single Host Utility metering domain.
- (c) A Distributed Energy Resource Aggregation shall be settled at the DRR Aggregation Zone Node price, except where a single Distributed Energy Resource or a group of Distributed Energy Resources can inject greater than or equal to 5 MW at a single transmission Node, in which case, they are prohibited from aggregating with facilities at other Nodes, and will be settled at the single transmission Node price, not at the DRR Aggregation Zone Node price.
- (d) The ISO shall determine that all of the Distributed Energy Resources in a Distributed Energy Resource Aggregation are located in the same DRR Aggregation Zone. For Distributed Energy Resources in a Distributed Energy Resource Aggregation with energy injection capability or demand reduction capability of 1 MW or greater, the ISO's determination shall be based on the Host Utility's evaluation of the transmission node that will serve the Distributed Energy Resource.

III.6.3 Distributed Energy Resource Size Requirements

Individual Distributed Energy Resources participating in a Distributed Energy Resource Aggregation must meet the following size requirements.

- (a) A Distributed Energy Resource with overall injection capability of 5 MW or greater that participates in the New England Markets through a Distributed Energy Resource Aggregation must participate as a single facility Distributed Energy Resource Aggregation and be modeled and priced at a single transmission Node.
- (b) If a group of Distributed Energy Resources can inject greater than or equal to 5 MW at a single transmission Node, this group of Distributed Energy Resources cannot aggregate with facilities at other Nodes. This group of Distributed Energy Resources may participate as a Distributed Energy Resource Aggregation that is modeled and priced at the single transmission Node.
- (c) For a Distributed Energy Resource Aggregation with multiple Distributed Energy Resources participating as a Generator Asset, Binary Storage Facility, or Continuous Storage Facility, each

participating Distributed Energy Resource in the aggregation must have injection capability of less than 5 MW.

- (d) For a Distributed Energy Resource Aggregation participating as a Demand Response Resource, the size requirements in Section III.8 shall apply.
- (e) For a Distributed Energy Resource Aggregation participating as a Demand Response Distributed Energy Resource Aggregation, the size requirements in III.6.5(b) shall apply.
- (f) For a Distributed Energy Resource Aggregation participating as a Settlement Only Distributed Energy Resource Aggregation, the size requirements in III.6.6 shall apply.
- (g) For a Distributed Energy Resource Aggregation participating as an ATRR, the size requirements in Section III.14 shall apply.

III.6.4 Metering and Telemetry Requirements

Distributed Energy Resource Aggregations must meet the following metering and telemetry requirements.

- (a) Distributed Energy Resource Aggregations participating as a Generator Asset, Binary Storage Facility, or Continuous Storage Facility, must comply with the metering and telemetry requirements in Sections III.3.2.1 and III.3.2.2.
- (b) Distributed Energy Resource Aggregations participating as an Alternative Technology Regulation Resource must comply with the metering and telemetry requirements in Section III.14.2.
- (c) Distributed Energy Resource Aggregations participating as Demand Response Resources or Demand Response Distributed Energy Resource Aggregations must comply with the metering and telemetry requirements in Section III.3.2.2. The metering and communication equipment associated with each participating Distributed Energy Resource must meet the requirements in Section III.3.2.2 and ISO New England Operating Procedure No. 18, Metering and Telemetry.
- (d) Metering for each Distributed Energy Resource participating in a Distributed Energy Resource Aggregation shall meet all applicable state and Host Utility requirements and be located at, a Retail Delivery Point, or point of interconnection as applicable. A Distributed Energy Resource's point of interconnection may be located behind a Retail Delivery Point to the extent that the pertinent Host Participant Assigned Meter Reader can accommodate such a configuration.
- (e) If a Distributed Energy Resource's point of interconnection is located behind a Retail Delivery Point it shall be reported such that its output or load does not impact the load reported for the Retail Delivery Point. A Distributed Energy Resource Aggregator may only propose a metering location behind a Retail Delivery Point if the Host Utility confirms in writing to the Distributed Energy Resource Aggregator that the appropriate metering and associated system upgrades are in place to support load and generation reporting and any necessary reconstitution. Proof of such

written confirmation from the Host Utility should be provided as part of the attestation as referenced in Section III.6.7(c)(i)2.

- (f) A Distributed Energy Resource Aggregator, as the entity responsible for providing any required metering information to the ISO, may designate itself, an agent acting on its behalf, or the Host Utility to act as the Assigned Meter Reader for Distributed Energy Resource Aggregations that include Generator Assets or Load Assets. Where the Distributed Energy Resource Aggregator designates itself or an agent acting on its behalf as the Assigned Meter Reader, the Distributed Energy Resource Aggregator or its agent shall:

- 1) be subject to all obligations applicable to an Assigned Meter Reader that is not the Host Participant, as detailed in the ISO's Tariff and other Operating Documents, including, but not limited to Operating Procedure 18 – Metering and Telemetry Criteria and Manual M-28 – Market Rule 1 Accounting, where such requirements may differ for Distributed Energy Resource Aggregations that include Generator Assets or Load Assets, and which may include adjustments for losses and/or residual unmetered load as appropriate; and
- 2) enter into applicable coordination agreements with the relevant Host Utility, which may include, but need not be limited to agreements required by the Host Utility or the relevant electric retail regulatory authority regarding:
 - i) specific requirements related to adjustments for losses and/or residual unmetered load for any Load Asset metering data;
 - ii) coordination of data transmittal; and
 - iii) protection of retail customer information.

Where a Distributed Energy Resource Aggregator designates itself or an agent acting on its behalf as the Assigned Meter Reader for its Distributed Energy Resource Aggregation, it shall provide, or cause to be provided, all data necessary for settlement (1) to the Host Participant Assigned Meter Reader by 0800 of the next Business Day following the Operating Day or at a later time as mutually agreed, and (2) to the ISO by 1300 on the second Business Day after the Operating Day. If the data provided includes any Profiled Load Asset data, as determined by the Host Participant, the Host Participant Assigned Meter Reader shall submit the Profiled Load Asset meter data directly to the ISO for settlement after appropriate adjustment for losses and/or residual unmetered load.

- (g) The Distributed Energy Resource Aggregator shall retain metering data for each participating Distributed Energy Resource for a period of six years for purposes of auditing.

III.6.5 Additional Requirements For Demand Response Distributed Energy Resource Aggregations

In addition to the rules applicable to all Distributed Energy Resource Aggregations, the following rules apply to Demand Response Distributed Energy Resource Aggregations. A Demand Response Distributed Energy Resource Aggregation allows Distributed Energy Resources with demand reduction capability, Distributed Energy Resources with energy injection capability and Distributed Energy Resources with energy withdrawal capability to participate in the wholesale markets as a single resource.

- (a) A Demand Response Distributed Energy Resource Aggregation must include Distributed Energy Resources with both demand reduction capability and energy injection capability and may include Distributed Energy Resources with energy withdrawal capability.
- (b) Size Requirements. Individual Distributed Energy Resources participating in a Demand Response Distributed Energy Resource Aggregation must meet the following size requirements:
 - (i) An individual Distributed Energy Resource with a Maximum Deviation Capability or ability to inject greater than or equal to 5 MW may not be registered as a component of a Demand Response Distributed Energy Resource Aggregation if its maximum energy injection capability is greater than its Maximum Facility Load. Such a Distributed Energy Resource must be the only facility associated with a Demand Response Distributed Energy Resource Aggregation and shall be modeled and priced at the transmission Node.
 - (ii) An individual Distributed Energy Resource with a Maximum Deviation Capability and maximum energy injection capability less than 5 MW may participate in a Demand Response Distributed Energy Resource Aggregation with other facilities located within the same DRR Aggregation Zone and metering domain. Such a Demand Response Distributed Energy Resource Aggregation shall be modeled and priced at the DRR Aggregation Zone Node.
 - (iii) If a group of Distributed Energy Resources has a Maximum Deviation Capability of, or can inject greater than or equal to 5 MW at a single transmission Node, this group of Distributed Energy Resources cannot aggregate with facilities at another Node. This group of Distributed Energy Resources may participate as a Demand Response Distributed Energy Resource Aggregation that is modeled and priced at the single transmission Node.

- (c) **Baseline, Offer Requirements and Related Threshold Requirements.** For each Demand Response Distributed Energy Resource Aggregation:
- (i) The ISO shall establish a baseline for each Distributed Energy Resource in the same manner as prescribed for a Demand Response Asset in Section III.8.2.
 - (ii) The Distributed Energy Resource Aggregator shall submit a Baseline Deviation Offer pursuant to Section III.1.10.1A(l) that reflects the aggregation's ability to deviate from its normal operational level.
 - (iii) Its Baseline Deviation Offer shall be subject to the Demand Reduction Threshold calculated pursuant to Section III.1.10.1A(f)
 - (iv) It may inject energy outside of dispatch intervals, which will be settled consistent with the rules for Settlement Only Resources.
 - (v) It may withdraw energy outside of dispatch intervals, which will be settled consistent with the rules for Load Assets.
- (d) **Performance Calculation.** The ISO shall calculate a Demand Response Distributed Energy Resource Aggregation's performance when it is dispatched. Such performance shall be the sum of the performance of each constituent Distributed Energy Resource. The ISO shall calculate the performance of each Distributed Energy Resource in the same manner as prescribed for a Demand Response Asset in Section III.8.4.

III.6.6 Additional Requirements For Settlement Only Distributed Energy Resource Aggregations

A Settlement Only Distributed Energy Resource Aggregation is a Distributed Energy Resource Aggregation that may include Distributed Energy Resources with non-dispatchable energy injection capability and/or non-dispatchable energy withdrawal capability. A Settlement Only Distributed Energy Resource Aggregation shall comply with all Market Rules applicable to Settlement Only Resources and the following additional rules.

- (a) A Settlement Only Distributed Energy Resource Aggregation may submit a Supply Offer and/or Demand Bid in the Day-Ahead Energy Market in accordance with the requirements in Section III.1.10.1A(m).
- (b) There is no maximum size limit for a Settlement Only Distributed Energy Resource Aggregation, provided each constituent Distributed Energy Resource would otherwise be eligible to register as a Settlement Only Resource pursuant to OP-14.

III.6.7 Coordination of Registration and Modification

The process of coordinating the registration and activation for participation in the New England Markets between the ISO, the Distributed Energy Resource Aggregator and the Host Utility, regardless of the participation model chosen, includes four stages: 1) Initial Notification of Intent to Register a Distributed Energy Resource Aggregation; 2) Eligibility Confirmation; 3) Registration and Activation; and 4) Updates to an Existing Distributed Energy Resource Aggregation Registration. Completion of the Distributed Energy Resource Aggregation registration process requires that the Distributed Energy Resource Aggregator, Host Utility (or its agent) and ISO meet the following requirements for each stage.

(a) Initial Notification

(i) Distributed Energy Resource Aggregator shall make an initial notification to both the ISO and the Host Utility (or the Host Utility's Agent) of its intent to register a Distributed Energy Resource Aggregation. Such notification shall include the information required by applicable ISO New England Manuals, including, but not limited to: the retail billing account(s) of the individual Distributed Energy Resource(s) participating in the aggregation, information regarding the location, anticipated size, technologies to be included, markets in which participation is planned, information required by the Host Utility Tariff and Terms and Conditions, and the participation model that the Distributed Energy Resource Aggregation intends to use for the Distributed Energy Resource Aggregation; interconnection agreement(s) for each participating Distributed Energy Resource, if required under state law; and an anticipated date to begin energy and/or ancillary service market participation.

(b) Eligibility Confirmation. The Host Utility (or its agent) shall review each Distributed Energy Resource's eligibility to participate in a Distributed Energy Resource Aggregation and confirm the Aggregator's eligibility to register the proposed Distributed Energy Resource Aggregation in the manner established in this subsection. The time period for such review shall begin when the Host Utility or its agent receives the initial notification from the Distributed Energy Resource Aggregator and shall not exceed 60 calendar days. The Host Utility (or its agent) shall provide written notice to the ISO and the Distributed Energy Resource Aggregator of the eligibility confirmation, in accordance with the eligibility criteria described in this subsection. The eligibility confirmation shall be provided by the Host Utility or its agent to the appropriate relevant electric retail regulatory authority upon request. If the ISO does not receive timely notification from the Host Utility or its agent, then the ISO will assume that the operation of the Distributed Energy Resource will not have a material reliability and/or safety impact on the

applicable distribution system and shall be eligible to register with the proposed Distributed Energy Resource Aggregation.

(c)

- (i) In order to verify eligibility, the Host Utility or its agent shall, to the extent practicable based on the representations made by the Distributed Energy Resource Aggregator in the initial notification or through information otherwise in the Host Utility's (or its agent's) possession:
 - 1. confirm that each Distributed Energy Resource's metered net consumption or injection of energy will not be included in another Load Asset (if the Distributed Energy Resource Aggregation includes load) or Generator Asset.
 - 2. confirm, based on the representations made by the Distributed Energy Resource Aggregator that no individual Distributed Energy Resource (as identified by any retail billing account record of the Host Utility) is participating in a retail program that prohibits it from providing the requested service in New England Markets.
 - 3. confirm based on the representations made by the Distributed Energy Resource Aggregator that the proposed operation of each Distributed Energy Resource as part of the proposed Distributed Energy Resource Aggregation has appropriate interconnection and/or operating agreements in place with the Host Utility applicable to its technology and size.
 - 4. determine whether the Distributed Energy Resource Aggregation may pose significant risks, or may require further study to evaluate the potential significance of the risks, to the safe and reliable operation of the distribution system based on analysis of relevant risk factors, such as overloads, voltage, stability, short circuit interrupting capability, flicker, equipment operation frequency coordination, and contingency analysis.
 - 5. consider whether the proposed operation of any Distributed Energy Resource participating in a proposed Distributed Energy Resource Aggregation, or the Distributed Energy Resource Aggregation as a whole, imposes a need for distribution system upgrades to avoid safety and reliability impacts and, if so, confirm that the Distributed Energy Resource Aggregator has self-certified that such upgrades have been completed or will be completed before the Distributed Energy Resource desired activation date.

6. confirm that all the Distributed Energy Resources are within the Host Utility's metering domain.
 7. confirm that the net injection and consumption capability of the Distributed Energy Resources participating in the Distributed Energy Resource Aggregation do not exceed the capabilities as authorized by any associated interconnection agreements.
- (ii) For a Distributed Energy Resource Aggregation connecting to a Host Utility that served less than or equal to 4 million MWh of load in the previous fiscal year, the Host Utility (or its agent) shall confirm that the relevant electric retail regulatory authority has authorized customers of the Host Utility to participate in Distributed Energy Resource Aggregations.
 - (iii) If the Host Utility (or its agent) confirms that the Distributed Energy Resource Aggregation is eligible in full or in part, the Distributed Energy Resource Aggregator shall provide a finalized list to the ISO and the Host Utility (or its agent) of the Distributed Energy Resources that have been found to be eligible for participation in the Distributed Energy Resource Aggregation, the participation model that the Distributed Energy Resource Aggregation intends to use, and the New England Markets in which the Distributed Energy Resource Aggregation plans to participate.
 - (iv) If the Host Utility (or its agent) confirms that the Distributed Energy Resource Aggregation is not eligible in full or in part, the Host Utility (or its agent) shall provide a written notice to the ISO and the Distributed Energy Resource Aggregator describing the eligibility criteria that were not met for any Distributed Energy Resource.
 - (v) In the event the Host Utility (or its agent) confirms that a Distributed Energy Resource Aggregation has not fulfilled the requirements of this subsection to be activated for participation in the New England Markets, and the Distributed Energy Resource Aggregator disputes this confirmation, the Distributed Energy Resource Aggregation may seek dispute resolution in accordance with Section I.6 of the Tariff if the dispute falls within ISO's authority or is subject to the Tariff or in a process established by the relevant electric retail regulatory authority if the dispute falls within the relevant electric retail regulatory authority's purview and the relevant electric retail regulatory authority has established such a process. Where the relevant electric retail regulatory authority has not established such a process, the Distributed Energy Resource Aggregator may seek resolution under Section I.6 of the Tariff. Notwithstanding the foregoing, any disputes regarding whether the Distributed Energy Resource Aggregator has appropriate

contractual rights to offer a Distributed Energy Resource as part of a Distributed Energy Resource Aggregation in the New England Markets shall be resolved in the manner established in such contract, or otherwise by a court of competent jurisdiction as applicable.

- (vi) In the event the ISO determines that a Distributed Energy Resource Aggregation is ineligible to participate in the New England Markets for reasons that are not related to the Host Utility (or its agent's) review, the Distributed Energy Resource Aggregator may seek resolution in accordance with Section I.6 of the Tariff.

(d) Registration/Activation

- (i) In order to complete the registration and activation of a DERA the DER Aggregator shall:
 - 1. Provide both the ISO and the Host Utility (or its agent) with a desired activation date, once eligibility has been confirmed.
 - 2. Provide the information required by applicable ISO New England Manuals, as well as 1) an attestation, in a form prescribed by the ISO, stating that all participating Distributed Energy Resources are fully compliant with the tariffs and operating procedures of the distribution utilities and the rules and regulations of any relevant electric retail regulatory authority, including the terms of any state interconnection agreements, and that the Distributed Energy Resource Aggregator retains the rights to offer the individual Distributed Energy Resource in New England Markets; and 2) confirmation in writing to the ISO and Host Utility (or its agent) that all Distributed Energy Resources in the Distributed Energy Resource Aggregation have been deemed eligible under subsection (b) of this section; and that the required metering and telemetry is in place, to meet the ISO requirements for participation in the planned markets.
- (ii) Prior to activation, the ISO must receive confirmation from the Host Utility (or its agent) that the Distributed Energy Resource Aggregator has met all applicable requirements with respect to metering and telemetry to enable the Host Utility or Assigned Meter Reader to include the Distributed Energy Resource Aggregation's metering in the appropriate Load Asset and metering domain.
- (iii) Distributed Energy Resources participating in a Distributed Energy Resource Aggregation may provide both retail and wholesale services to the extent such dual participation is allowed under state law or regulation, the Distributed Energy Resource Aggregator retains the rights to such services from the owner of the Distributed Energy

Resource, and so long as the Distributed Energy Resource Aggregation is able to comply with all requirements under the ISO Tariff.

- (e) Updates/Modifications to Existing Distributed Energy Resource Aggregation
 - (i) When a Distributed Energy Resource is added to or removed from an existing Distributed Energy Resource Aggregation, the Distributed Energy Resource Aggregator shall update the Distributed Energy Resource Aggregation's registration information. Such updates shall include: the information required by applicable ISO New England Manuals, sufficient to confirm that any newly added Distributed Energy Resources are eligible for participation; notification to the ISO and the Host Utility (or its agent) by the Distributed Energy Resource Aggregator of any Distributed Energy Resource being removed from the aggregation; verification that any required metering is in place for the reconfigured Distributed Energy Resource Aggregation; and an updated list of participating Distributed Energy Resources and the updated performance capabilities of the aggregation to be reflected in the aggregation's registration information.
 - (ii) The Host Utility (or its agent) shall have up to 60 days to confirm eligibility and review any impacts associated with Distributed Energy Resources that the Distributed Energy Resource Aggregator is proposing to add to or remove from an existing Distributed Energy Resource Aggregation.
 - (iii) Changes to the Distributed Energy Resources participating in a Distributed Energy Resource Aggregation shall become effective in the manner stated in Manual M-RPA.

III.6.8 Operational Coordination

The responsibilities related to the coordination of operations of a Distributed Energy Resource Aggregation between the Distributed Energy Resource Aggregator, the ISO, and the Host Utility are as follows:

- (a) The Distributed Energy Resource Aggregator shall: operate Distributed Energy Resources in a manner consistent with the limitations and operating orders established by the Host Utility; confer with the applicable Host Utility on a periodic basis to ensure available distribution service exists to operate its Distributed Energy Resources consistent with its New England Market obligations; submit outage requests for each Distributed Energy Resource Aggregation as necessary and to the extent required by ISO Operating Documents, in order to reflect known distribution system

constraints or limitations that reduce the overall capability of the Distributed Energy Resource Aggregation; as required, account for any known limitations of the distribution system to which the Distributed Energy Resources are connected in its Offer Data for the Distributed Energy Resource Aggregation including restrictions that have been placed directly on the Distributed Energy Resource Aggregation by the Host Utility in the form of an override of an ISO Dispatch Instruction; determine a Distributed Energy Resource-level operating plan to be provided to the Host Utility for analysis, subject to the requirements of each Host Utility.

- (b) The Distributed Energy Resource Aggregator shall have a Designated Entity or Demand Designated Entity, as applicable, for each of its Distributed Energy Resource Aggregations in accordance with the provisions set forth in ISO Operating Procedures. Designated Entities and Demand Designated Entities for Distributed Energy Resource Aggregations shall comply with the requirements of each Host Utility and/or relevant electric retail regulatory authority as applicable.
- (c) In the event that the Host Utility identifies conditions on the distribution system that result in actual or anticipated limitations on the operation of individual Distributed Energy Resources or Distributed Energy Resource Aggregations, the Host Utility shall notify the relevant Distributed Energy Resource Aggregator as soon as practicable.
- (d) The Host Utility may temporarily override the ISO's dispatch of a Distributed Energy Resource Aggregation. Such override shall only occur in circumstances where needed to maintain the reliable and safe operation of the distribution system.
- (e) Failure of a Distributed Energy Resource Aggregation to follow an ISO Dispatch Instruction due to a Host Utility override does not excuse the Distributed Energy Resource Aggregator from any applicable charges (including any penalties) to which the Distributed Energy Resource Aggregator is subject under the terms of Sections III.3.2.1(g), III.3.2.1(h), III.3.2.6, III.9.7, III.13.7.2, III.F.3.1.2(i), and III.F.3.2 of the Tariff.
- (f) The ISO shall coordinate with the applicable Host Utility to avoid conflicting operational directives, which may include but is not limited to sharing Day-Ahead Energy Market results and Real-Time Dispatch Instructions.

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