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PROJECT NO. 53911

AGGREGATED DISTRIBUTED ENERGY RESOURCES - ERCOT PILOT PROJECT § § PUBLIC UTILITY COMMISSION OF TEXAS

**ARMADA POWER COMMENTS ON DESIRED CONTENT
IN THE GOVERNING DOCUMENT**

Armada Power is a thermal storage company that uses reliable aggregated water heater demand control as a grid resource. Invented solely to respond to grid reliability, our patented hardware and software participate in markets across the United States and Canada.

Armada Power previously submitted comments on the scope and purpose of the Aggregated Distributed Energy Resources (ADER) Pilot Program Task Force. In response to the Task Force's invitation stated on September 2, at the conclusion of the workshop meetings, for stakeholders and task force members to identify critical elements needed for a successful ADER pilot program, Armada Power offers the following:

- Craft a project that leaves open the door to both existing and future technologies while defining the requirements of the technology for eligibility without specifying a particular technology.
- Ensure that customers have the flexibility to use any LSE for the ADER program and not be restricted to using the same LSE for generation supply (same REP) in both Choice and ADER. This will allow customers participation flexibility in both REP products while also providing the option of not moving their QSE for ADER purposes. It also ensures that ERCOT is certain of the MW available without concern of disenrollment due to customers' rights to choose and frequently switch REPs.
- Armada suggests the task force provide a recommendation of minimum participation size in terms of aggregation pool size, not individual load contributor which allows for broad participation of many technologies and customers.
- Armada recommends the task force pilot a series of ancillary products like those offered in other wholesale markets and should strongly consider the following:



- ✓ Renewables Firming: a real-time forecast signal response.
- ✓ Synthetic Inertia: ADER response to droop control.
- ✓ Bi-Directional Frequency Regulation

Armada continues to be a committed stakeholder in this important pilot program project and looks forward to participating in the task force process and working with all interested parties to fully examine ADER for the betterment of Texas.

Respectfully submitted,

A handwritten signature in black ink that reads "Paul A. Cauduro". The signature is written in a cursive, flowing style.

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