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PROJECT NO. 53911

AGGREGATE DISTRIBUTED	§	PUBLIC UTILITY COMMISSION
ENERGY RESOURCE (ADER)	§	OF TEXAS
ERCOT PILOT PROJECT	§	
	§	

COMMENTS OF AUTOGRID ON PROJECT NO. 53911. AGGREGATE DISTRIBUTED ENERGY RESOURCE (ADER) ERCOT PILOT PROJECT

AutoGrid appreciates the opportunity to provide written comments to Project No. 53911 on ERCOT's Aggregate Distributed Energy Resources (ADER) Pilot Project. AutoGrid is a subsidiary of Schneider Electric and provides technology that manages and optimizes distributed energy resources (DERs) to serve grid needs, ranging from residential smart thermostats and EV chargers to industrial-scale equipment such as chillers, pumps, and large storage assets. AutoGrid has been managing demand flexibility across Texas for over 10 years across 10 customers. AutoGrid welcomes the continued discussion at the Commission and appreciates the opportunity to be a resource to you as the VPP Pilot continues to evolve.

IMPORTANCE OF INTEROPERABILITY FOR RELIABILITY AND CONSUMER EXPERIENCE

AutoGrid believes in a technology- and vendor-agnostic VPP platform to aggregate and manage a wide variety of DERs for energy providers. Currently, AutoGrid complies with various open communication protocols including IEEE 2030.5, IEEE 1815-2012 (DNP3), OpenADR, Sunspec ModBus, and other SCADA protocols. Open standards shall ensure that the APIs are free from security vulnerabilities and protect the privacy of the personal and sensitive data that is transmitted through them. Open standards would create an equally competitive market and avoid unnecessary and inefficient monopolies across OEMs. While it takes upfront investment in time and resources for DER providers and third-party aggregators to comply with evolving standards, it is important that all market stakeholders are moving in the same

direction so that in a few years, every device communicates using the same standard, which will accelerate the deployment of VPPs. Open standards shall also ensure that the APIs are free from security vulnerabilities and protect the privacy of the personal and sensitive data that is transmitted through them.

As an alternative to open standards, many OEM providers have proprietary APIs that DER aggregators must pay subscription fees to access. Whether DER providers are using open standards or proprietary APIs, it is critical that OEM providers provide open access to the APIs and send updated documentation on their proprietary APIs to third-party aggregators in a timely manner.

Without accurate API documentation, DER aggregators will encounter even more barriers to reliable device communication. For example, if an OEM does not send updated documentation to a VPP provider, this could lead to issues during a critical peak load event. Other OEM providers, such as Battery OEMs and EV OEMs, have proprietary APIs and do not allow DER aggregators to access them, as they build out their own VPP capabilities. With this example, they operate under a closed ecosystem or only work with select aggregator partners.

Alternatively, some OEM providers only allow access to their APIs once certain requirements are met by the VPP provider (such as the number of devices on a platform) or by end-customers (customers must authorize control over the trunk of their vehicle in order to give access to managed charging). In this case, there are devices that cannot be aggregated, which leaves MWs of demand flexibility unmanaged. In turn, these MWs of unmanaged flexibility can exacerbate peak demand and can't be shifted to off-peak hours.

AutoGrid's Head of Policy and Market Development, Sruthi Davuluri, is happy to be a resource for the Commission staff as the Commission continues to work on this project.

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