

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Hybrid Resources**

)

**AD20-9-000**

**COMMENTS OF  
THE AMERICAN COUNCIL ON RENEWABLE ENERGY**

The American Council on Renewable Energy (“ACORE”) submits these comments in response to the Federal Energy Regulatory Commission’s Notice Inviting Comments, issued May 26, 2021, on the Regional Transmission Organization and Independent System Operator (“RTO/ISO”) informational reports regarding hybrid resource issues and on the Commission’s May 26, 2021 staff white paper on hybrid resources.<sup>1</sup> ACORE is a national nonprofit organization dedicated to advancing the renewable energy sector through market development, policy changes and financial innovation.

**I. Comments on Hybrid Resource Terminology**

The Commission’s staff white paper on hybrid resources accurately notes, “[t]he RTOs/ISOs differ in their terminology, or the terminology they are considering in the stakeholder or other processes, to address co-located hybrid or integrated hybrid resources.”<sup>2</sup> These differences were underscored by the RTO/ISO informational reports regarding hybrid resources issues where, of the six jurisdictional RTO/ISOs, it was clear that only CAISO has established a definition for hybrid resources at all.<sup>3</sup> NYISO,<sup>4</sup> MISO<sup>5</sup> and SPP<sup>6</sup> are developing

---

<sup>1</sup> *Hybrid Resources*, 174 FERC ¶ 61,034 (2021).

<sup>2</sup> *Hybrid Resource White Paper*, Docket No. AD20-9-000 (May 26, 2021) at 23.

<sup>3</sup> *Informational Report of the California Independent System Operator Corporation*, Docket AD20-9-000 (July 19, 2021).

<sup>4</sup> *Report of the New York Independent System Operator, Inc.*, Docket AD20-9-000 (July 19, 2021).

<sup>5</sup> *Report on Hybrid Resources of the Midcontinent Independent System Operator, Inc.*, Docket AD20-9-000 (July 19, 2021).

<sup>6</sup> *Report on Hybrid Resources of Southwest Power Pool, Inc.*, Docket AD20-9-000 (July 19, 2021).

further definitions through their stakeholder processes while ISO-NE<sup>7</sup> and PJM<sup>8</sup> appear content to avoid defining the term all together. Some make a distinction between co-located and integrated hybrid resources while others cannot begin to do so given the infancy of hybrid resource integration in their footprints.

The Commission should consider establishing a standard definition of the term “hybrid resources.” While RTO/ISOs may have valid reasons for establishing distinct hybrid resource participation models, the lack of a consistent terminology hinders the ability to identify and solve hybrid resource challenges on a national level, particularly at agencies such as this one. The staff white paper on hybrid resources correctly notes that “standardized terminology specific to co-located hybrid and integrated hybrid resources might offer the benefit of creating a shared understanding of how wholesale market rules may accommodate co-located hybrid and integrated hybrid resources.”<sup>9</sup> Standardizing terminology would further benefit market participants operating or seeking to operate across markets, where novel and potentially conflicting nomenclatures can serve as a barrier to entry and unjustly protect incumbents.

Respectfully submitted,

*/s/ Tyler Stoff*

\_\_\_\_\_  
Tyler Stoff

Director of Regulatory Affairs

stoff@acore.org

American Council on Renewable Energy  
1150 Connecticut Ave N.W., Suite 401  
Washington, D.C. 20036

Dated: September 20, 2021

---

<sup>7</sup> *ISO New England Inc. Response to Order Directing Reports*, Docket AD20-9-000 (July 19, 2021).

<sup>8</sup> *Re: Hybrid Resources*, PJM Interconnection, L.L.C., Docket AD20-9-000 (July 19, 2021).

<sup>9</sup> *Hybrid Resource White Paper*, Docket No. AD20-9-000 (May 26, 2021) at 24.