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. \(^1\) 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.” \(^2\) 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. \(^3\) NYISO, \(^4\) MISO \(^5\) and SPP \(^6\) are developing

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\(^1\) Hybrid Resources, 174 FERC ¶ 61,034 (2021).


further definitions through their stakeholder processes while ISO-NE\textsuperscript{7} and PJM\textsuperscript{8} 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.”\textsuperscript{9} 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

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\textsuperscript{7} ISO New England Inc. Response to Order Directing Reports, Docket AD20-9-000 (July 19, 2021).
\textsuperscript{8} Re: Hybrid Resources, PJM Interconnection, L.L.C., Docket AD20-9-000 (July 19, 2021).
\textsuperscript{9} Hybrid Resource White Paper, Docket No. AD20-9-000 (May 26, 2021) at 24.