**From:** Hanhan Hammer, Concentric Energy Advisors

**Sent:** Sunday, October 6, 2024 11:08 AM  
**Subject:** Re: Locklizard Recommendation 24001 and Attachments - Hanhan Hammer, Concentric Energy Advisors

Hello Sandra,

Thank you for providing me the access to the contract documents. I read through the documents and would like to provide the following feedback.

I led the ISO-NE's Order 2222 compliance effort for four years before joining Concentric Energy Advisors three months ago. My comments are from the Order 2222's perspectives.

* This contract facilitates DER Aggregators and the utilities to sell and buy distribution services (DS). Although it touches on certain aspects of DER Aggregations participating in both retail and wholesale market programs (e.g., Section 18 Operational Coordination), it did not address what to do in the event of conflicting dispatch signals from DSO and the ISO, or what to do when the DSO overrides ISO's dispatch instructions.
* On the topic of DSO overriding ISO's dispatch instructions, I observed that the industry has a lot of confusion about under what circumstances a DSO should perform the override. Order 2222 simply said "emergency", but didn't define emergency. I think it is important to develop a common understanding of what kind of emergencies would warrant override. This is because a DSO's override could incur wholesale market penalty. DER Aggregators being penalized may dispute the necessity of the override, if such emergencies were not well defined.
* As the utilities are implementing Order 2222 before the deadline (2026 - 2029 depending on the ISOs), certain DER Aggregations may only participate in the wholesale markets (they are not selling DS to the utilities). In such cases, to ensure the safety and reliability of the distribution system, the utilities would need to define the roles and responsibilities of DER Aggregators participating in the ISO's Day-Ahead and Real-Time markets. A standard contract would be helpful when DER Aggregations do not sell distribution services to the utilities but use the utilities' distribution network to sell wholesale services.

Thanks again for your help.

**Hanhan Hammer**

Senior Project Manager

Concentric Energy Advisors

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