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IURC Implementation re: FERC Order 2222 Stakeholder Meeting

March 2, 2023

Presentation Outline

1. Introduce SUN and our work
2. Market principles and use cases
3. Questions to answer with implementation

Introduce SUN and our work

Our National Impact

8,100+ families with solar
67 Megawatts of solar
$175M invested locally
867,000 Tons of CO2 saved

Indiana impact since 2019

$10.3M
Energy savings over 25 years

Total local solar investment around the state

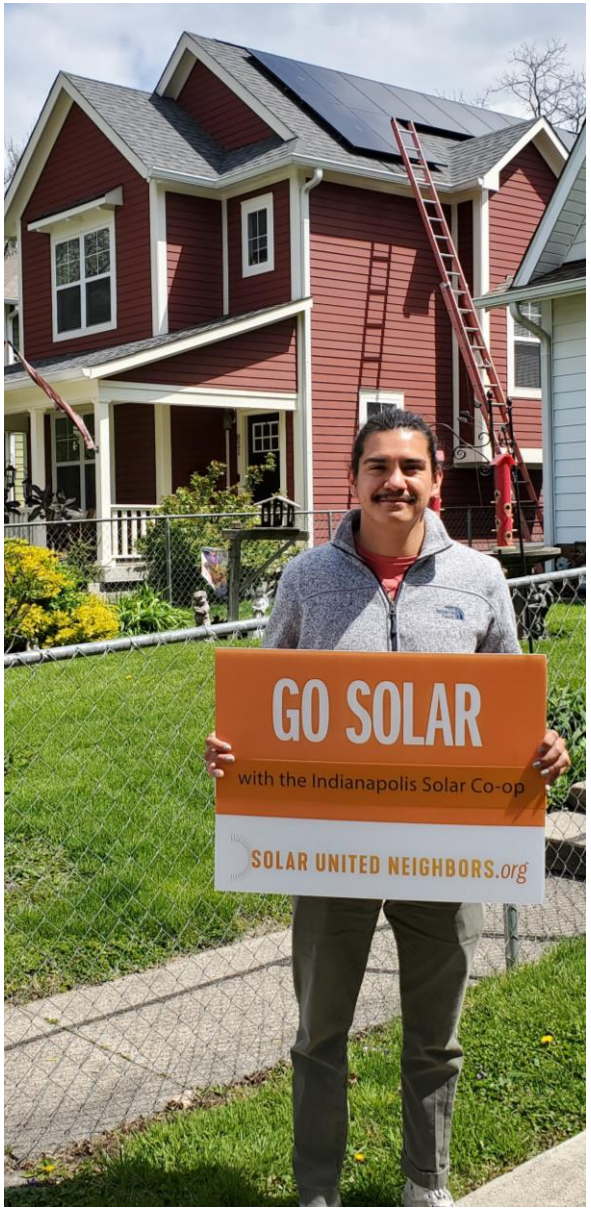
$6.15 Million

260+
Indiana homes, businesses, and nonprofits with solar

50,000
metric tons of lifetime CO2e offsets

2.25 MW
Installed capacity

Indiana impact since 2019



Our goals

1) Create more options for customers

2) Ensure any new rules don't harm customers who only want to participate in retail programs

3) Support rules that will enable DER aggregation as a tool that all Hoosiers can benefit from, directly or indirectly

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Market principles and use cases

Market Principles Overivew

1) Fair Market Design

2) Fair Market Access

3) Transparency

4) Data considerations

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Fair Market Design

- Markets with **competition** and **transparency** are favored over noncompetitive and untransparent ones
- Increased adoption of decentralized renewables, battery storage, energy efficiency, and demand response to meet grid demand **should be leveraged to lower system costs while improving the reliability and resilience of the energy system**.
- Rules should **enable participation** (entry and exit), **facilitate innovation**, and **enable participants to realize the full market value** of DERs.
- **Consumer protections should be included in rules** to ensure they are implemented in a manner that prevents consumers from being taken advantage of, provides opportunity for dispute resolution in a fair and timely manner, and authorizes appropriate enforcement mechanisms.

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Fair Market Access

- There should be **interoperability and compatibility standards** between grid operators, market actors, and participating devices.
- Individual DER owners should be **eligible to participate in relevant programs without discrimination**.
- Any **equipment, monitoring, and/or telemetry requirements** for individual DER owners to participate **should be reasonable** and designed so that additional costs or regulatory burden do not disincentivize or bar participation by eligible customers.
- Individual DER owners must be provided with **accurate, timely, and transparent information** regarding how participation in aggregator programs might impact any retail or other programs in which they may already be enrolled.
- The market should be **structured with fairness and equity** so that all eligible customers have an equal opportunity to participate.

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Transparency

- The **data necessary to make market decisions** should be available to individual DER owners, as well as the other market participants, in a timely fashion.

- Market products should be **simple, easy to understand, transparent, and easy to access** for all eligible customers.

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Data considerations

- Individual DER owners should **retain ownership rights of the data** used by other market participants **and retain the control of transaction and data use** decisions and terms.

- Grid operators should **provide electricity use and production meter data** at a frequency sufficient to enable market participation.

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Use cases

- Encourage the IURC to **consider specific "use cases" during the rulemaking process** to help better understand DER configurations likely to be proposed by aggregators in the new marketplace

- MISO developed several while preparing its Order 2222 Compliance Plan, but **IURC & stakeholders could also develop other options as appropriate**

- One example from MISO DERTF – "**Use Case Chestnut**"
  - 175 rooftop PV systems (5 – 15 kW each)
  - 50 storage devices, charged from the grid or from rooftop PV
  - Two 1 MW community solar gardens

- More detail about MISO use cases: https://cdn.misoenergy.org/20220113%20DERTF%20Item%2006%20Reliability%20Focus%20-%20Use%20Case%20Studies617871.pdf

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Questions to answer with implementation

Additional questions

How can the **existing interconnection process** be leveraged to ensure minimal burden to program participation for potential customers?

Is there a way to **simplify / fast track the process for standard aggregation of simple systems** (perhaps guided by use cases)?

What **additional use cases** can help to steer Indiana's policy development?

How can Indiana **create programs that attract aggregators** to meet market demand?

Where are the **market gaps that aggregators can help fill** (like meeting resource adequacy needs)?

What can the IURC do to **engage more aggregators / market participants in this process**?

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Questions?