**Enel X North America, Inc. (Enel X) and Enel Green Power North America, Inc. (EGP)**

**Summary of Responses to Proposals from ERCOT from BEST Force Meeting on October 18, 2019**

**KTC-2 PRC and ORDC**

Based upon discussion with ERCOT Staff, Enel X and EGP support ERCOT’s recommendation.

**KTC-3 Dispatch Pricing Mitigation**

Enel X and EGP support the application of SWOC to energy storage resources (ESR); however, do not support the terminus of the SWOC as of December 31, 2023 because the date seems arbitrary. Rather, Enel X and EGP suggest that alternative considerations be part of the termination of the SWOC application to ERS as detailed below:

1. The small fish rule no longer applies
2. An alternative methodology for ESR is developed

**KTC-4 Technical Requirements**

No comment at this time.

**KTC-6 State of Charge**

Enel X and EGP understand that ERCOT would prefer not to manage state of charge (SOC) of ESR. Enel X and EGP also appreciate, and support, ERCOT’s proposal to allow ESR’s to update their energy offer curves (EOC) up to the start of the operating hour as an improvement to the current process, which is the hour prior to the operating hour. Enel X and EGP also appreciate the ability to move toward intra-operating updates as soon as feasible. As such, Enel X and EGP support ERCOT’s recommendation.

**KTC-10 Study and Capacity Assumptions**

Enel X and EGP support ERCOT’s recommendation that ESRs not be subject to day-ahead or hour-ahead residual unit commitment processes. Because of its short-start capabilities, ESRs will be committed consistent with other short-start resources. Rather than indicating through state of charge, the ESRs availability, ESRs will indicate availability through duration limitations. Enel X and EGP support ERCOT’s proposal to indicate availability through duration limitations until longer-term RUC reprogramming can occur that accommodate state of charge.