

longer entirely accurate. In addition, it was not clear a footnote can be included in a rule in this fashion.

- Subsection (2) – Maintaining such a database only makes sense for DERs that are generation or constitute storage and, for practical reasons, they must be known to the utility.
- Subsection (3) – The addition to this subsection is designed to avoid duplication with portions of Chapter 22 that already cover many of the DERS included in the definition, while adding consideration of the market potential for others.
- Subsection (4) –
 - Congestion is a type of reliability concern, but there are others that DERS could improve;
 - “(C)” is now already covered in Subsection (3).
 - DERs do not always reduce peak demand or the size of supply-side resources (and do not always delay them), e.g., EVs that do not charge in the off-peak.
 - “(E)” simply stated that RTO requirements must be followed. If this is an RTO requirement, the rule need not provide for it.
 - New “(E)” (formerly “(G)”) has been modified to exclude the line-by-line analysis, as this kind of detailed analysis would be costly and time consuming and in the Utilities’ view, unnecessary. However, an estimate of the transmission network loss reduction on existing and potential DER is supported but should be designed to capture value based specifications.

The Utilities appreciate the opportunity to provide these suggestions and look forward to discussing them further as the workshop process proceeds.

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