

Case/Matter Number: 14-M-0101

Case/Matter Title: Proceeding on Motion of the Commission in Regard to
Reforming the Energy Vision

**Reply Comments by New York State Smart Grid Consortium
on the DPS Staff Straw Proposal on Track One Issues**

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Identifying New York Distribution System Platform (DSP) Business Architecture, Standards & Protocols

*A review and update to the proposed stakeholder process to be facilitated by the
NYS Smart Grid Consortium (10/23/2014)*

1. The Proposed Consortium Facilitated Process (as filed September 22)

- The Consortium proposed to facilitate an open and collaborative stakeholder process to advise and provide the best possible information to the Commission, Commission Staff, the NYS utilities, technology companies, and other key industry stakeholders regarding the appropriate DSP Business Architecture and associated Standards and Protocols (S&P). The activity will result in the development of an implementable DSP structure based on Commission specified market design objectives, and will provide a thorough understanding of the interactions and interdependencies among all the market participants.

This balance of this document describes how the scope of the original proposal has evolved since it was filed on September 22, 2014 and clarifies several issues touched on in the Consortium comments on the Staff Straw Proposal.

2. High Level Approach – Focus primarily on the business and technical interactions between the DSP and DER market participants

In the Consortium Proposal we had identified the need to define and confirm the following first before moving into the details. This first step would strive to ensure that all the stakeholders are working off the same assumptions and end state vision for the REV process –

- Business Architecture. Confirm the highest priority set of capabilities that are required to achieve the Commission's market design objectives and to carry out the tasks associated with the DSP function, which might include:
- Functional Architecture – which should include sufficient information to support the market interactions and also the processing needed internally by the DSP and other stakeholders to support the interactions:
- Technical/Application Architecture – Fundamental to the effort here is the need to 1) adopt an appropriate communications architecture to ensure interoperability and 2) complete an assessment of technology availability and maturity and technology/functionality mapping and gap analysis.

Clarifying Note: The objective is to focus just enough time on the market design objectives and business architecture discussions to ensure a high-level conceptual design is in place. The objective is to ensure that the stakeholders establish a common ground understanding regarding the priority capabilities, interactions, and the set of technologies necessary for the market to function effectively. It will also be used as the foundation for more in depth discussions with and among stakeholders leading to the development of the associated technical standards and protocols.

3. The Consortium recommends an integrated Stakeholder Process in the areas of market and technical platform design, but not for the development of the “Jointly Filed Uniform DSP Plan”

Staff’s Straw Proposal released on August 22, 2014 concludes that “there is significant work needed to further define, scope, and plan for the full implementation of the DSP platform and market”¹ and recommends a three-part planning process that includes a Technical Platform Design Stakeholder Process, a Market Design Stakeholder Process, and a Jointly Filed Uniform DSP plan.

In comments filed on September 22 the Consortium emphasized that the three primary areas where Staff calls for stakeholder engagement – technical platform design, market design, and the identification and development of functions and capabilities that should be uniform across utilities – are interrelated, and as such, should be addressed in a single integrated stakeholder process. Market design, which will be defined by Commission policy, will dictate the interactions among market participants, which will drive the necessary functions and capabilities of the DSP, which will influence enabling technologies and all associated standards and protocols requirements. In its initial comments the Consortium recommended that these topics not be assigned to separate stakeholder groups, and that they needed to be addressed in an integrated fashion so that the implications of decisions in one area, and any corresponding tradeoffs and impacts on other areas, can be immediately identified and understood. Recognition of these interdependencies would be a central tenet of the stakeholder process envisioned by the Consortium.

Clarifying Note - The Consortium proposed process is intended to identify, among other things, technical platform design areas that should be uniform across utilities, but the proposal was not to have the Consortium facilitated process also include the preparation of the Jointly Filed Uniform DSP Plan. That would be prepared and filed by the utilities, with input from stakeholders.

4. Preliminary thoughts regarding the design of the Consortium facilitated process

Establishing a Core Working Group

1. Preliminary thinking is to assemble a core working group, with an emphasis on working, including, at a minimum, representatives from each of the NY utilities, the NYISO, Staff of the PSC, and representatives from key stakeholder groups including consumers, DER providers, clean and smart grid technology companies, and researchers and technical consultants as deemed appropriate by the working group.
2. The core working group would be kept to a manageable size, perhaps 20 people maximum, and participation in the group would be based on demonstrated accomplishment and leadership in the area of utility distribution systems, DER market participation, customer/grid integration, and

¹ Developing the REV Market in New York: DPS Staff Straw Proposal on Track One Issues, August 22, 2014, Pg. 66

the development of utility industry standards and protocols. The participants would also need to commit the time to fully participating in the effort. The working group could be considered at the center of multiple concentric circles of stakeholders, all with a great interest in the REV proceeding outcomes, but with varying degrees of time available to dedicate to the DSP architecture, standards and protocol topics. Without limiting the size of the core Working Group and by designing the stakeholder process in this way, we believe the probability of an effective process and high quality outcomes would be minimal.

3. The primary purpose of the group is to be advisory and objective, and to be a forum where representatives of key stakeholder groups can strive to achieve common ground on the most important Technical Platform Design issues. The products of the Working Group would regularly be provided to all parties in the REV proceeding for comment and feedback. Meetings would regularly be opened up to all stakeholders for input and comment on the Working Group's draft products. These products would be intended as a resource for not only the utilities as potential DSP's, but for all stakeholders and the Commission. It is not anticipated at this time that the Working Group itself would file comments or be considered as an active party in the REV proceeding. The materials developed would be available to all stakeholders, and the stakeholders would use certain products of the Working Group as they deemed appropriate. It is expected that the utilities would utilize the products of the Working Group, as appropriate, in the planning and implementation of their potential DSP responsibilities. The Working Group may also be asked periodically to provide advice to the Commission and Staff on certain technical issues, such as the architecture, standards and protocols associated with the design and implementation of the DSP function.

Preliminary Details of the Proposed Approach

It is envisioned that the initial stage of the effort would last approximately six months, and might follow the following approach:

Phase 1 -

- Hold one or more kickoff meetings to review and agree on the collaborative, transparent, and open process by which this effort will be carried out – consistent with NY PSC guidance.
- Conduct collaborative workshops on the following specific topics
 - Confirm the market design objectives and associated Business Architecture
 - Confirm the Functional Architecture and define the necessary interactions between the DSPs and the participants, including information requirements
 - Confirm the Technical/Application Architecture necessary to accomplish the functions
- The working group, with expert assistance, then focuses on testing the Business Architecture on one DER component (e.g. energy storage or PV) by:
 - Developing/identifying interface standards.
 - Developing/identifying functional requirements, which would include how those resources, should perform when they are interconnected to the grid.
- The Working Group would then move on to confirm all DER interfaces, including:
 - Identifying those that have mature standards or standards under development.

- Identifying those for which standards still need to be developed; and either develop the standards and protocols or identify the right standards organization to lead the development of this effort.
- Developing recommendations based upon the confirmed architectures, including the necessary standards and protocols according to all appropriate NY PSC and FERC guidelines.
- Delivering the entire confirmed architecture and recommended S&P to the PSC and stakeholders for consideration.
- Conducting training workshops for all stakeholders on the architectures, standards and protocols either identified or developed throughout this process.
- Identifying mechanisms and methodologies for estimating and communicating the market value of DER within the proposed DSP framework.