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## **Comments on DER Orchestration Research RFI**

*Additional submitted attachment is included below.*

Response to Docket: 23-ERDD-01

Response by: Enetrics LLC

Response Date: March 28, 2025

As a vendor of test tools for distributed energy resource (DER) standards conformance, Enetrics respectfully submits the following responses to the “DER Orchestration Research – Request for Information (RFI).”

*2. What performance metrics should a research demonstration achieve to assure confidence in resource dispatchability?*

As the DER industry is now beginning to reach a level of maturity regarding standards, we strongly encourage demonstrations to use existing standards. In the event that those standards do not provide all of the necessary messaging or information, we recommend that the demonstrations propose extensions to existing DER standards.

*4. What is the industry need for dedicated testing and certification of DER gateway functionalities and conformance independent of the inverter or DER they are paired with? Would there be interest in a unified, open testing procedure that verifies DER gateways' functionality and adherence to utility-mandated communication requirements?*

There is certainly a need for dedicated testing and certification of DER gateways. Currently, if an inverter uses a gateway, that particular gateway is coupled with the inverter when listing.

However, if there were standardized, certified gateways as well as standardized, certified inverters, this would allow for the mixing and matching of gateways and inverters as needed and desired at deployment.

We recommend focusing on the immediate needs in the market, which we perceive to be translation between CSIP (required in California for communications with the utility) and the protocols required by IEEE 1547-2018 (IEEE 2030.5, SunSpec Modbus, DNP3).

Beyond testing and certification, a standardized mapping between these protocols is needed. This mapping should be standardized in an internationally recognized SDO. IEEE 1547.1-2020 already contains mappings that may be adequate for this purpose.

*5. Which requirements should this testing tool cover in its scope?*

We note that this question references “testing tool.” We recommend that a tool not be created as part of this process, as there are multiple tool vendors already in the market who will likely develop a testing tool for gateway testing and certification, if testing and

certification procedures were in place. As many of the necessary pieces already exist in testing tools (e.g., CSIP testing, SunSpec Modbus testing, DNP3 testing), test tool vendors should be able to accelerate the creation of such a tool. Our company, Enetrics, would gladly create such a tool and our competitors likely would as well. The market can then decide which tools best accomplish the task.

*7. Should this research scope (gateway conformance testing) be under a separate funding group to be conducted independent of the VPP demonstrations, or should this scope be incorporated as a phase of a larger VPP field deployment demonstration?*

Given the urgent need for independent gateway testing and certification in the market, we suggest decoupling from VPP demonstrations. We also suggest having a tight scope of work that could quickly put in place test procedures for gateway testing and certification. Once those test procedures are agreed upon in an internationally recognized SDO, companies such as Enetrics will be eager to release tools into the market to perform the testing.

#### *Other Comments*

We strongly recommend that any work to define testing procedures for DER gateways occur in an internationally recognized SDO such as IEEE. Given that these test procedures will likely be useful outside of California and that a large market will benefit California ratepayers, it is important that an internationally recognized SDO be utilized, as was recently done with the standardization of CSIP. Accredited SDOs give the assurance of fair and balanced participation and are often much easier to cite in legislation.