

March 10, 2026

North American Energy Standards Board
1415 Louisiana Street
Suite 3460
Houston, TX 77002

Dear Sir/Madam,

The North American Electric Reliability Corporation (NERC) supports the development of a distributed energy resource (DER) registry. Such a registry could contribute to reliability as it may facilitate bulk power system (BPS) system modeling by NERC and transmission entities.

NERC's past work has highlighted that a single system-of-record could facilitate coordination across the necessary stakeholders.¹ For instance, a system-of-record could be used to track the growing aggregate capabilities, configurations, controls, and conditions of DERs, in addition to other pertinent information. Transmission Planner and Planning Coordinator models could leverage this modeling information when implementing NERC Reliability Standards developed in response to FERC Order No. 901.

Thus, NERC supports development of the DER registry as it could help industry monitor and assess the potential BPS impacts surrounding aggregate DER growth. Should you have any further questions, please contact me at your earliest convenience.

Sincerely,

/s/ Latrice Harkness

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¹ Available here: https://www.nerc.com/globalassets/our-work/reports/white-papers/white-paper-der-aggregator-uncertainty_clean.pdf