



2101 Webster St.
Suite 1300
Oakland, CA 94612

SierraClub.org

10 March 2026

Re: DER Entity Registry and development of NAESB Business Practice Standards to Support Interoperability

Dear members of the WEQ BPS, RMQ BPS, and NAESB staff,

The Maryland Chapter of Sierra Club appreciates the opportunity to submit comments regarding the proposal for creation of a Distributed Energy Resources (DER) Entity Registry and development of NAESB Business Practice Standards to support interoperability in discussion within both the North American Energy Standards Board (NAESB) Wholesale Electric Quadrant Business Practices Subcommittee (WEQ BPS), as well as the Retail Markets Quadrant Business Practices Subcommittee (RMQ BPS).

The Maryland Chapter of the Sierra Club is a non-profit, member-led organization with over 13,000 members across the state of Maryland. As an organization, we are committed to ensuring that the region's energy future is reliable, affordable, and aligned with the health and economic well-being of the communities we serve. For these reasons, Sierra Club supports the move towards consistency regarding DERs throughout the United States, and particularly as it impacts Maryland. A DER Registry will facilitate the achievement of Maryland's climate goals, including the Climate Solutions Now Act's requirement to reduce emissions 60% by 2031, as well as renewable and energy storage targets codified in Maryland's Renewable Portfolio Standard and Energy Storage Act.

Enabling clean energy resources, including DER technologies, to supply power to the grid is a foundational and urgent prerequisite for achieving a just energy transition amidst the mounting threat of global climate change. We recognize that too often, administrative and operational challenges arise that stymie the addition and interoperability of these resources on the bulk power system. Further, a key opportunity for DER participation in energy markets is through aggregation. The disparate nature of reporting, lack of data transparency, and different accounting methods for DERs across various regions and utilities has resulted in unnecessary difficulty with coordinating and aggregation—and is ostensibly creating unnecessary barriers to—greater DER deployment.

We are particularly energized to see the move towards either (1) a national DER registry that would consolidate and standardize reporting and tracking protocols for nationwide DERs, or (2) enforcement of a singular set of data standards across multiple DER registries. This move towards a uniform procedural standard for DER registration will meaningfully simplify and improve consistency when integrating DERs, which can ease administrative and planning burden caused by the current reliance on disjointed registry systems. The increased transparency that can be expected with this shift will also support enhanced DER deployment initiatives while ensuring bulk electric system reliability.

We applaud NAESB's initiative to spearhead this work, and look forward to learning the outcome of this group's efforts.

Thank you,

Josh Tulkin

Josh Tulkin
Director, Sierra Club Maryland Chapter