

Hi DOER team,

On behalf of AES Distributed Energy, below are our questions, related to the published Storage Adder Guideline draft. Please let me know if I can provide any clarification on the questions noted below.

1. Is there a particular time/date/season which the 52 cycles must occur within?
2. Who dictates when the 52 cycles occur? Is this at the sole discretion of the owner of the PV + Battery system? Or is there expected to be coordination/approval from the utility?
3. Is there a maximum amount of cycles in a year?
4. The draft regulations state: *The Energy Storage System must discharge at least 52 complete cycle equivalents per year and must remain functional and operational in order for the Solar Tariff Generation Unit to continue to be eligible for the energy storage adder. If the Energy Storage System is decommissioned or non-functional for more than 15% of any 12-month period, the Department may disqualify the Solar Tariff Generation Unit from continuing to receive the energy storage adder.*
 - a. Is there an allowance for degradation? For example, the kwh for a 2hr duration over 52 cycles in year 1, will result in less kwh for the same 2hr duration over 52 cycles in year 20.
 - b. Or do you expect the developer to run more cycles in year 20, to make up for degradation, in order to meet the same nameplate as year 1?

Thanks,

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