|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|

|  |  |  |  |
| --- | --- | --- | --- |
| **Period of Comment:** | March 15, 2023 | through | April 12, 2023 |
| **Comments From:** | Energy Storage Canada |
| **Date [yyyy/mm/dd]:** | 2023/04/05 |

 |

|  |  |
| --- | --- |
| **Contact:** | Robert Tremblay |
| **Phone:** | 1-403-903-6234 |
| **Email**: | robert.tremblay@energystoragecanada.org |

 |

Instructions:

1. Please fill out the section above as indicated.
2. Please use the table below to describe any final concerns or issues with the Energy Storage ISO Rule Amendments.

|  | **AESO Questions to Stakeholders** | **Stakeholder comments**  |
| --- | --- | --- |
| 1 | Do you have final ***concerns or issues*** with any substantive change to an ISO rule or definition in the Energy Storage ISO Rule Amendments? If so, please elaborate.  | As was raised by various parties at the Feb 2nd Energy Storage ISO Rule Amendments stakeholder session, it appears that Section 503.6 requires energy storage resources provide frequency support while charging. This is concerning as this appears to be treating energy storage resources differently than other consumers of active power, such as loads or braked and/or inactive wind facilities, as mentioned by participants on Feb 2nd.To the extent required frequency responsiveness incur cost to energy storage facilities while charging, Energy Storage Canada believes that services energy storage resources provide the Alberta electrical system, such as frequency responsiveness, should be compensated through a market mechanism. |