

Stakeholder Comment Matrix
Energy Storage ISO Rule Amendments Specific Questions



<p>Period of Comment: May 9, 2022 through June 9, 2022</p> <p>Comments From: Energy Storage Canada</p> <p>Date: 2020/10/09</p>	<p>Contact: Justin W. Rangooni</p> <p>Phone: 416 997 3095</p> <p>Email: jrangooni@energystoragecanada.org</p>
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Instructions:

1. Please fill out the section above as indicated.
2. The AESO is seeking Stakeholder assistance with the questions below. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

	Development of a Proposed ISO Rule	Stakeholder Comments
1.	<p><u>Options for Incorporating Hybrid Facility into the ISO rules</u></p> <p>The Energy Storage ISO Rule Amendment Webinar explained the drafting issues the AESO encountered when incorporating hybrid facilities into the rule book.</p> <p>Should the AESO continue with the proposed definition of “aggregated facility” to account for hybrid facilities, as well as aggregations of the same technology type (Option 1)?</p> <p>or</p> <p>Should the AESO explore the adoption of a separate “hybrid facility” definition (Option 2)?</p> <p>Please elaborate on the reasons for your preferred option.</p>	
2.	<p><u>Facility Rules</u></p> <p>In the 500-series rules, do you spot any situations where an energy storage resource would be subject to compliance double jeopardy?</p>	

	Development of a Proposed ISO Rule	Stakeholder Comments
3.	<p><u>Fast Frequency Response (FFR) Service Provisions</u></p> <p>In your view:</p> <ul style="list-style-type: none"> (i) are the proposed amendments effective in enabling technology-agnostic FFR service in replacement of LSSi? (ii) do the proposed amendments capture the revisions necessary to facilitate technology-agnostic FFR service? (iii) are there any gaps for FFR service within the ISO rules? 	<p>Given the approach to contract FFR service, ESC supports the proposed amendments and believes it captures the objective of enabling technology-agnostic FFR service</p>
4.	<p><u>Adjustment for Load on the Margin (ALM) Provisions</u></p> <p>Do the proposed amendments facilitate the implementation of ALM? Do you see any gaps?</p>	<p>ESC has no comment</p>
5.	<p>Do you have any additional comments on the Energy Storage ISO Rule Amendments?</p>	<p>ESC has no additional comments at this time and believe AESO has handled the energy storage inclusion in ISO rules at this time very well.</p>
6.	<p>Was the Energy Storage ISO Rule Amendments Webinar helpful to your review and understanding of the Energy Storage ISO Rule Amendments?</p> <p>Would you support the AESO using a similar approach for future ISO rule consultations in lieu of stakeholder sessions?</p>	<p>Yes, the rule amendment webinar was helpful, and ESC supports using a similar approach in future ISO rule consultations.</p>
7.	<p>Were the Energy Storage ISO Rule Amendments Map and the Consolidated Draft ISO Rule Book helpful to your review and understanding of the Energy Storage ISO Rule Amendments?</p>	<p>Yes, the ISO Rule Amendment Map and Consolidated ISO Rule Book were helpful for the review.</p> <p>Two suggestions are made. First, a clean version for searching final drafting of the Consolidated Draft ISO Rule Book. Second, a blackline and clean version of the Consolidated Glossary / definition changes would have been helpful.</p>

