

Period of Comment: March 1, 2021 through March 31, 2021	Contact: Justin Rangooni
Comments From: Energy Storage Canada	Phone: 647.627.1815
Date: 2021/03/31	Email: jrangooni@energystoragecanada.org

Instructions:

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

The AESO is seeking Stakeholder comments regarding the following questions related to the development of proposed amendments to ISO rules to enable energy storage (“Energy Storage ISO Rule Amendments”):

	Development of a Proposed ISO Rule	Stakeholder Comments
1.	Do you agree or disagree that the issue identified in the letter of notice requires the proposed Energy Storage ISO Rule Amendments? Why or why not? Please comment.	ESC agrees with the issues identified in the letter of notice. The discussion papers and recommendation papers have provided appropriate information to interested parties on the issues. Further, the stakeholder consultation sessions have provided a proper forum to discuss the challenges facing energy storage resource development and operation in Alberta.
2.	Do you agree or disagree with the potential purpose of the proposed Energy Storage ISO Rule Amendments? Why or why not? Please comment.	ESC agrees with the purpose of the proposed Energy Storage ISO Rule Amendments <i>“to facilitate the integration of energy storage, improve the clarity required for market qualification and participation, and enable efficient, effective connection, monitoring and control of energy storage facilities when connected”</i>
3.	Do you agree or disagree with the proposed consultation activities? Why or why not? Please comment.	ESC agrees with the proposed consultation activities. ESC believes the AESO has been diligent in addressing the barriers to energy storage resources in Alberta. The approach and execution by the AESO is a good example of how markets should address significant changes to market design.
4.	Do you have any comments in relation to the prioritization of the development of the proposed Energy Storage ISO Rule Amendments or the related timeline? Please comment.	At this time, ESC has no comments on prioritization.
5.	Do you agree or disagree with the AESO’s recommendation regarding hybrid asset participation? Why or why not? Please comment.	ESC agrees with the proposed recommendation for hybrid asset participation; however, ESC is interested in understanding how the recommendation will be translated into an ISO market rule and what nuanced issues may arise.
6.	Do you agree or disagree with the AESO’s recommendation regarding full-range participation? Why or why not? Please comment.	<p>ESC agrees with the proposed recommendations for full-range participation with one exception. The AESO has indicated that a decision for optional full-range participation must be made as part of site commissioning. The AESO should explore allowing energy storage resources to change their full-range participation under specific circumstances initially as the risks and administrative complexities of full-range are not well known at this time.</p> <p>ESC notes that the concerns of administrative complexity related to the linked asset mechanism may still exist and reserves the right to comment further when draft ISO market rules are published.</p>

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7.	Do you agree or disagree with the AESO's recommendation regarding energy storage state of charge requirements? Why or why not? Please comment.	ESC agrees with the recommendation regarding energy storage state of charge requirements. ESC support is based on the understanding that state of charge will not be used for dispatch decision making; but instead will be used to help determine if changes to energy market offers and bids are allowed within the locked window (i.e., the time period when market participants cannot change their bid without justifiable reasons).
8.	Do you agree or disagree with the AESO's recommendation regarding energy storage commissioning requirements? Why or why not? Please comment.	ESC agrees
9.	Do you have any additional comments?	ESC thanks the AESO for the opportunity to participate.