

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

1. Please fill out the section above as indicated.
2. Please use the table below to comment on, or raise any concerns with, the proposed revisions within ISO rule. This includes comments on the following:
 - a. The substantive or administrative changes within the ISO rule;
 - b. Any issues related to how a proposed amended or new definition works within the ISO rule; and
 - c. Any content that should be included in a related information document.
3. Blank boxes will be interpreted as favourable comments.

	Proposed Amended ISO Rules	Stakeholder Comments
1.	Section 103.4, <i>Power Pool Financial Settlement.</i>	
2.	Section 201.7, <i>Dispatches</i>	
3.	Section 202.2, <i>Short-Term Adequacy and Supply Shortfall</i>	
4.	Section 202.3, <i>Issuing Dispatches for Equal Prices</i>	
5.	Section 202.4, <i>Managing Long Lead Time Assets</i>	

	Proposed Amended ISO Rules	Stakeholder Comments
6.	Section 202.5, <i>Supply Surplus</i>	The ISO rule allows exports to adjust their interchange transaction within 2 hours of the start of the settlement interval. ESC requests the AESO consider the ability for energy storage resources to adjust their energy bid within 2 hours of the start of the settlement interval. In other words, if there is a supply surplus event it would be in the best interest of economic efficiency to allow energy storage resource to consume the excess supply before it is spilled.
7.	Section 202.6, <i>Adequacy of Supply</i>	
8.	Section 203.1, <i>Offers and Bids for Energy</i>	
9.	Section 203.3, <i>Energy Restatements</i>	
10.	Section 203.4, <i>Delivery Requirements for Energy</i>	
11.	Section 205.2, <i>Issuing Dispatches and Directives for Operating Reserve</i>	
12.	Section 205.4, <i>Regulating Reserve Technical Requirements and Performance Standards</i>	
13.	Section 205.5, <i>Spinning Reserve Technical Requirements and Performance Standards</i>	
14.	Section 205.6, <i>Supplemental Reserve Technical</i>	
15.	Section 205.8, <i>Transmission Must-Run</i>	
16.	Section 301.2, <i>ISO Directives</i>	
17.	Section 302.1, <i>Real Time Transmission Constraint Management</i>	
18.	Section 303.1, <i>Load Shed Service</i>	
19.	Section 304.3, <i>Wind and Solar Power Ramp Up Management</i>	

	Proposed Amended ISO Rules	Stakeholder Comments
20.	Section 304.4, <i>Maintaining Network Voltage</i>	
21.	Section 304.7, <i>Event Reporting</i>	
22.	Section 304.8, <i>Event Analysis</i>	
23.	Section 304.9, <i>Wind and Solar Aggregated Facility Forecasting</i>	
24.	Section 306.3, <i>Load Planned Outage Reporting</i>	
25.	Section 306.4, <i>Transmission Planned Outage Reporting and Coordination</i>	
26.	Section 306.5, <i>Generation Outage Reporting and Coordination</i>	
27.	Section 306.7, <i>Mothball Outage Reporting</i>	
28.	Section 501.10, <i>Transmission Loss Factors</i>	
29.	Section 502.1, <i>Wind or Solar Aggregated Facilities Technical Requirements</i>	
30.	Section 502.3, <i>Interconnected Electric System Protection Requirements</i>	Can the AESO please explain the reasoning and justification for the 18 MW limit for energy storage resources maximum authorized real power rating?
31.	Section 502.5, <i>Generating Unit Technical Requirements</i>	
32.	Section 502.6, <i>Generating Unit Operating Requirements</i>	
33.	Section 502.7, <i>Load Facility Requirements</i>	
34.	Section 502.8, <i>SCADA Technical and Operating Requirements</i>	
35.	Section 502.9, <i>Synchrophasor Measurement Unit Technical Requirements</i>	

	Proposed Amended ISO Rules	Stakeholder Comments
36.	Section 502.13, <i>Battery Energy Storage Facility Technical Requirements</i>	
37.	Section 502.14, <i>Battery Energy Storage Facility Operating Requirement</i>	
38.	Section 502.15, <i>Reporting Facility Modelling Data</i>	
39.	Section 502.16, <i>Aggregated Facilities Operating Requirements</i>	
40.	Section 504.3, <i>Coordinating Energization, Commissioning and Ancillary Services Testing</i>	
41.	Section 504.4, <i>Coordinating Operational Testing</i>	
42.	Section 505.2, <i>Performance Criteria for Refund of GUOC</i>	
43.	Section 505.3, <i>Coordinating Energization, Commissioning and WECC Testing Activities</i>	
44.	Section 505.4, <i>Coordinating Operational Testing</i>	

	Proposed New ISO Rule	Stakeholder Comments
45.	Section 203.5, <i>Consumption Requirements for Energy Storage</i>	