

Fast Frequency Response Program Stakeholder Feedback Guidance & Submission Form

October 5, 2023

Request for Feedback

The following instructions guide the preparation of stakeholder feedback. If you would like to provide additional (concise) documentation to support your proposed product design, please note these in the “Other Relevant Information” section and include the document(s) with this submission form. The AESO requests that submissions include sufficient detail to ensure a clear understanding of the product design(s) and key technical and commercial considerations.

Submissions may be emailed to FFRServices@aeso.ca by end-of-day **Monday, Oct. 30, 2023**.

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For purposes of evaluating potential Fast Frequency Response (FFR) products, the AESO established and presented four key principles at the Frequency Response Stakeholder Session on Thursday, Oct. 5, 2023. These principles are included in form below, and in the PPT presentation posted on the [Fast Frequency Response Services Procurement](#) AESO Engage site.

You are invited to provide an overview of the proposed fast frequency response product design, including appropriate technical and commercial considerations in sufficient detail for the AESO to understand the product design. Please include all available information that will help the AESO understand the product design and how it will enable market access.

A separate form and related documentation is required for **each** proposed product design.

Specifically, please provide:

Section 1: General feedback on frequency response services as presented.

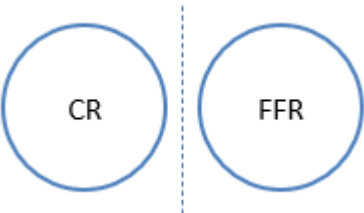
Section 2: Proposed revisions to the three Proportional FFR designs (where revisions align to principles).

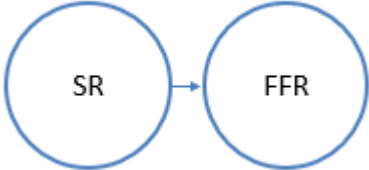

Section 3: New proposed designs for Proportional FFR product or other frequency response products, as applicable.

Section 1: General feedback on frequency response services as presented

Energy Storage Canada is supportive of the development of existing ancillary services to meet the existing and future frequency needs of the AIES. Energy storage resources will be a key competitor to providing these services.

Section 2: Proposed revisions to the three Proportional Fast Frequency Response (FFR) designs (where revisions align to principles)

Item	Description	Response
<p>Option #1 - FFR and Contingency Reserve (CR) products (separate products)</p> 	<ul style="list-style-type: none"> • Capable assets are separate and not dependent on participation in CR. • Commercial obligation to be available to provide FFR in all hours. • Obligation to always be available to be armed for FFR. • AESO reviewing response requirement for FFR. 	

Item	Description	Response
<p>Option #2 - FFR contingent on Spinning Reserve (SR) (single product)</p> 	<ul style="list-style-type: none"> • Capable assets that participate in active SR and can provide an FFR (enhanced frequency) response. • Assets are contractually obligated to be available for FFR if they clear SR. • Must clear SR to provide FFR. 	
<p>Option #3 - Carve out from SR (combined product)</p> 	<ul style="list-style-type: none"> • FFR volumes carved out of SR. • Dedicated capacity (always providing SR attributes and available to be armed for FFR as required). • Obligation to always provide new combined product. 	

Section 3: New proposed designs for Proportional FFR product or other fast frequency response products.

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Item	Description	Response
<p>PRINCIPLE 1</p> <p>Increase Market Access: Must consistently be available to be armed to enable imports when required (i.e., to facilitate imports when scheduled and maintain MSSC for internal generation when islanded).</p>	<p>Please specify:</p> <ul style="list-style-type: none"> • How or whether the proposed product design meets Principle 1. • How the product design fits within the existing regulatory framework. 	
<p>PRINCIPLE 2</p> <p>Individual products must be capable of being implemented in a timely manner (i.e., early 2025).</p>	<p>Please specify:</p> <ul style="list-style-type: none"> • How or whether the proposed product design meets Principle 2. • How the product design fits within the existing regulatory framework. 	
<p>PRINCIPLE 3</p> <p>Design must enable AESO to meet our regulatory obligation to restore the intertie at minimum cost</p>	<p>Please specify:</p> <ul style="list-style-type: none"> • How or whether the proposed product design meets Principle 3. • How the product design fits within the existing regulatory framework. 	
<p>PRINCIPLE 4</p> <p>The FFR products must maintain design flexibility to align with potential outcomes and timelines from Market Pathways.</p>	<p>Please specify:</p> <ul style="list-style-type: none"> • How or whether the proposed product design meets Principle 4. • How the product design fits within the existing regulatory framework. 	

Other Relevant Information	Please list any other relevant documents being provided for the proposed FFR product design.
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Thank you for your input.