

Stakeholder Comment Matrix – April 9, 2020

Overview of Short-term Market Implementation Requirements for Energy Storage Participation



Period of Comment: April 9, 2020 through April 27, 2020 Comments From: Energy Storage Canada Date: 2020/04/27	Contact: Justin Rangooni, Executive Director Phone: 647-627-1815 Email: jrangooni@energystoragecanada.org
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Instructions:

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. Email your completed comment matrix to energystorage@aeso.ca by **April 27, 2020**.

The AESO is seeking comments from Stakeholders with regard to the following matters:

	Questions	Stakeholder Comments
1.	Are there areas where further clarity on expected participation would be helpful?	<p>For energy storage participation in energy market, can the AESO provide further details on the reasoning why only the discharge capability can be offered? Specifically, what are the AESO tool restrictions that does not allow the AESO to calculate the value of cross-over production (that is going from consumption to production)? In particular ESC is interested in understanding:</p> <ul style="list-style-type: none"> • Is the issue due to the timelines required to procure, test, and implement an update to the dispatch algorithm or other AESO tool components? • Are there limited or no tools available that can handle the calculations required to include a cross-over dispatch instruction? <p>For dispatch and dispatch compliance (section 4.1.3), a hybrid dispatched energy storage asset locked into “firm” or “non-firm”? or will they be able to elect to change the designation? If change is allowable, what is the process in doing so?</p>
2.	Are there areas of market participation that in your view need special consideration for energy storage that are not identified in the overview document?	The AESO procures Load Shed Services for imports (LSSi) as a transmission reliability product. Most energy storage facilities are inverter-based connections that can respond to dispatch instructions within half-a-cycle. Has the AESO considered how energy storage resources could participate in LSSi and what requirements might

		<p>be needed for participation?</p> <p>The AESO's Energy Storage Roadmap states "The unique attributes of energy storage facilities are not the same as loads or generators, as currently contemplated in the AESO Authoritative Documents, resulting in a lack of clarity in the application of those documents". Further, the AESO acknowledges the need for change of the ISO tariff for fair and equal treatment "the AESO will ensure that the unique characteristics of energy storage are considered in ISO tariff applications submitted to the AUC for approval". Energy Storage Canada believes that unique tariff treatment for energy storage resource that reflect their use of the power system. The current ISO tariff design does not allow fair and equal treatment for energy storage resources and is a key barrier to participation. While the AESO is assessing an energy storage tariff as part of the Bulk and Regional Tariff engagement, there are many other issues associated with that consultation that could delay or overshadow energy storage resource's immediate needs. Therefore, Energy Storage Canada recommends that a unique energy storage tariff be developed as part of the Short-Term Implementation Plan to reduce the barriers to participation. For example, the AESO could consider a temporary interruptible rate tariff for energy storage resources while the broader Bulk and Regional Tariff engagement proceeds.</p>
3.	Additional comments	<p>Generally, Energy Storage Canada is supportive of the short-term implementation plan and the conclusions that the AESO has arrived at. In particular, the ability for hybrid projects to choose between a coupled or uncoupled market assets is progressive and supports participation of hybrid projects in the AESO market.</p>

Thank you for your input. Please email your comments to: energystorage@aeso.ca .