

Stakeholder Comment Matrix – April 23, 2020

Overview of Energy Storage Resources – Operating Reserves Qualification and Technical Requirements and Alberta Reliability Standards Applicability



Period of Comment: April 23, 2020 through May 7, 2020 Comments From: ENMAX Corporation Date: 2020/05/07	Contact: ██████████ Phone: ██████████ Email: ██████████
--	--

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 May 7, 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 in the Operating Reserves (OR) market or applicability of the Alberta Reliability Standards (ARS) would be helpful?	No comment.
2.	Are there areas of market participation or compliance with standards that in your view need special consideration for energy storage that are not identified in the qualification and ARS applicability document?	The 60-minute requirement to deliver is applicable to all OR providers, regardless of technology. What happens when, after the 60 minutes, an Energy Storage Resource (ESR) has spent its charge but is still contracted to provide OR? Is 'Charge Depleted' an AOR? If ESR is no longer providing OR, does AESO activate Standby? Assuming yes, further clarity is required on who would pay for this? ENMAX would expect that the ESR that has restated out due to lack of charge would face Liquidated Damages (LD) charges.
3.	Additional comments	ENMAX supports a framework which remains technology agnostic where a technology is able to meet the objectives or requirements. Equal standards should apply, and preferred treatment should not be granted to a specific technology over another.

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