

2.	<p>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?</p>	<p>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 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</p>
<p>Issued for Stakeholder Comment: April 23, 2020</p>		<p>Page 1 of 2 Public</p>
		<p>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".</p> <p>Energy Storage Canada believes that unique tariff treatment for energy storage resource that reflect their use of the power system is required. 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. In particular, Energy Storage Canada recommends that energy storage resources providing Regulating Reserve are excluded from tariff charges for consumption as a result of following the regulation signal.</p>
3.	<p>Additional comments</p>	<p><i>[NTD: I have no additional comments, wondering if members may want to include something]</i></p>

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

