

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, through May 7, 2020

Comments From: TransAlta Corporation

Date: 2020/05/07

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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 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 comments at this time.
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?	No comments at this time.

3.	Additional comments	<p>The requirements for restatements of energy storage assets should be further clarified to minimize the requirement for frequent AC restatements</p> <p>TransAlta appreciates the guidance provide in the document that the Available Capability (AC) of an energy storage asset can be restated within T-2 for an Acceptable Operational Reason. However, we are unclear about how frequently this should be done and recommend that additional guidance provided by the AESO minimize the requirement for frequent AC restatements.</p>
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		<p>A BESS's State of Charge (SOC) can change minute-by-minute and result in a large volume of restatements if this requirement is not further rationalized. Our concern is that this can result in a significant administrative and compliance burden on the owner of a BESS as well as overwhelm the AESO with unnecessary/excessive submissions.</p> <p>We understand that the owner of the BESS is expected to make offers based upon the expected AC for the delivery hour; however, this requires the owner to predict whether they will be dispatched in energy. This will result in situations where the owner predicts wrongly that the BESS will be in merit/out of merit and result in ACs and offers being less/more than the actual SOC and necessitate AC restatements. The owner has no intent to misstate the BESS' capability but rather the inaccurate AC/offers are a result of the complexity of predicting merit orders and BESS dispatch.</p> <p>There are other cases, such as when owners are selling operating reserves from the BESS, where the owner will have no way to predict if they will be directed to provide operating reserves and for how long the directive will last. In such circumstances, the owner SOC and AC will track the AESO's directions and energy instructed to be discharged from the BESS. This could result in numerous AC restatements being submitted to the AESO in very short periods of time.</p> <p>We encountered a similar issue with respect to the pilot program for wind generation where AC was being restated on nearly a minute-by-minute basis to match energy output – this practice was subsequently clarified, rationalized and modified by the AESO so that AC restatements were only necessary when there was a derate/outage that impacted the capacity of the wind generator rather than for changes in wind generation energy output.</p> <p>TransAlta recommends that, at a minimum, the AESO should state its expectation on the magnitude of change to AC that the BESS should restate. For example, stipulating that a > 5 MW or > 10 MW change in AC requires a restatement could significantly reduce the frequency of restatements while still providing the system controller the information he/she requires to dispatch the market. An ideal solution would be to mirror the requirements for wind generation, where no AC restatement is required unless the BESS is derated or on outage. In such situations the AESO may be able to view the AC/SOC of the battery through the SCADA or other data feed to provide the information required to the system controllers.</p>
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Thank you for your input. Please email your comments to: energystorage@aeso.ca .