

## Stakeholder Comment Matrix – April 9, 2020

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



<b>Period of Comment:</b> April 9, 2020 through April 27, 2020 <b>Comments From:</b> Turning Point Generation (TPG) <b>Date:</b> 2020/04/27	<b>Contact:</b> [REDACTED] <b>Phone:</b> [REDACTED] <b>Email:</b> [REDACTED]
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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](mailto: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?	<i>Further clarity is required in relation to Section 4.1.2. of the document regarding the terms of an AC restatement under AOR. The AESO states that an energy storage asset will only be permitted to restatement under limited conditions, specifically at relative 0% and relative 100% charge. TPG requests further clarity to understand the interplay between this limitation and an energy storage asset's ability to sustain its commitments in both the Energy and AS markets. TPG recommends that this scenario be permitted as an AC restatement under AOR.</i>
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?	<i>Yes, it is TPG's view that tariff treatment needs special consideration in AESO's Short-Term Market Implementation Requirements for Energy Storage Participation. TPG absolutely supports and commends the AESO's efforts to clarify energy storage asset participation under the current Authoritative Documents (AD). As per the AESO's stated view though, energy storage is a unique asset class and requires unique treatment which the current AD does not provide. Specifically, TPG suggests that the current tariff design does not recognize the unique nature of energy storage assets and may result in tariff charges that are not just and reasonable under the FEOC test. While the Short-Term Market Implementation considers some important issues, TPG</i>

		<p><i>submits that these issues could be viewed as secondary, if the practical implications of unjust and unreasonable tariff charges cause a significant enough barrier to hinder commercial deployment of energy storage assets. TPG believes that the tariff treatment, if left unprioritized, could contribute to this unfortunate result in the short-term. TPG believes that this prioritized clarity is required for all energy storage assets, regardless of development stage and anticipated ISD. TPG recommends that the AESO prioritize the tariff treatment of energy storage assets as part of the short-term implementation plan.</i></p>
3.	Additional comments	<p><i>TPG commends and supports the AESO's overall plan to integrate energy storage and the AESO's recognition that energy storage is unique; neither a load, nor a generator. We appreciate AESO's continued work and focus on this subject matter.</i></p>

Thank you for your input. Please email your comments to: [energystorage@aeso.ca](mailto:energystorage@aeso.ca).