

## 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> EDF Renewables Development Inc. <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?	<ul style="list-style-type: none"> <li>• In Section 4.1.3, the AESO discusses the ability of hybrid dispatched energy storage assets to select whether it is operating as “firm” or “non-firm”. Can the AESO elaborate on when that selection will occur (e.g., during the interconnection process, during operation)? Can a facility change from one operation type to another and what would be the process to do so?</li> <li>• Section 7.3 – For hybrid applications the Energy Storage dispatch is typically limited by the size of the transformer, and therefore the GUOC payment should be limited by the transformer size and not the combination of the renewable energy nameplate capacity and the MWh/MW of the ESS. This should also be the consideration for Losses (STS).</li> </ul>
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?	<ul style="list-style-type: none"> <li>• The AESO is investigating with stakeholders moving to sub-interval settlement (i.e., 15-minute settlement). Has the AESO considered any unique impacts of this change on energy storage resources?</li> <li>• Load Shed Services for imports (LSSi) is a unique reliability product procured by the AESO to manage import contingency events. In short, LSSi providers</li> </ul>

		<p>must be able to respond within 12 cycles. Inverter-based energy storage can respond as fast as a half-cycle depending on communication system capability. Energy storage resources would be a unique asset to provide LSSi, can the AESO share their views on the ability of energy storage resources to provide LSSi? At a high-level, what would be the requirements for energy storage resources to participate in LSSi?</p>
3.	Additional comments	<ul style="list-style-type: none"> <li>• Overall, EDF Renewables supports the short-term implementation requirements for energy storage participation outlined in the report</li> <li>• In particular, the ability to select whether a hybrid project is a single entity for participation or two separate metering points and participation types is an important decision by the AESO that allows greater flexibility for energy storage resources.</li> <li>• EDF Renewables would be interested to understand in greater detail:             <ul style="list-style-type: none"> <li>○ what short-term implementation decisions are most likely to be revisited for the long-term implementation plan; and,</li> <li>○ what decisions will carry over and shape the long-term implementation plan? In other words, does the AESO have a view on what aspects of the short-term implementation plan will be final decisions?</li> </ul> </li> </ul>

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