

## 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> Nutana Power Ltd. <b>Date:</b> 2020/4/29	<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?	<p>1. <i>The third paragraph of Section 4.1.2 discusses non-compliance with a dispatch instruction. ID #2009-003R provides guidance on the definition of the term "acceptable operational reason", and specifies that subsection (iii) of the definition only applies where the constraint is "unanticipated or could not have been avoided by the exercise of reasonable diligence". It would be helpful for the AESO to clarify the following:</i></p> <ol style="list-style-type: none"> <li><i>ID #2009-003R indicates that "...a pool participant that has insufficient fuel after exercising reasonable diligence to secure fuel may have an acceptable operational reason". For a stand-alone energy storage asset that is both a source and a sink, does the AESO believe the pool participant must exercise reasonable diligence to re-charge that asset in order for it to have an AOR under subsection (iii) of the definition?</i></li> <li><i>If the answer to question 1.a is "yes", what qualifies as the exercise of reasonable diligence when re-charging, keeping in mind that the ISO rules do not obligate sink assets to bid?</i></li> <li><i>If the answer to question 1.a is "no", what is the AESO's rationale for treating energy storage assets differently from thermal assets? In</i></li> </ol>

		<p><i>particular, how does the supply of fuel as energy differ from the supply of electricity as energy?</i></p> <p>2. <i>Sections 3 and 7 discuss the characterization of hybrid assets and application of the ISO tariff. Consider a hybrid asset configured as two independent source assets, each of which has an MC &gt;5MW, where one source asset is a variable renewable (Asset A) that is capable of charging the other energy storage source asset (Asset B). It would be helpful for the AESO to clarify the following:</i></p> <ul style="list-style-type: none"> <li>a. <i>Does the AESO view a pool participant's decision to use power from the Asset A to charge Asset B as a withdrawal of power from the AIES?</i></li> <li>b. <i>If the answer to question 2.a is "yes", must the pool participant comply with the normal bid / offer process in order to do so?</i></li> <li>c. <i>If the answer to question 2.a is "yes", will the pool participant be assessed rate DTS?</i></li> <li>d. <i>If the answer to question 2.a is "no", does the AESO's proposed asset characterization regime conform with AUC decisions on self-supply?</i></li> </ul>
2.	<p>Are there areas of market participation that in your view need special consideration for energy storage that are not identified in the overview document?</p>	<p><i>Hybrid assets raise special considerations in the context of ancillary services products. Has the AESO considered whether a pool participant should be paid to remedy voltage and frequency issues that its asset causes?</i></p>
3.	<p>Additional comments</p>	<p><i>Nutana Power strongly supports the timely integration of energy storage and the AESO's leadership in this area.</i></p>

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