

<b>Period of Comment:</b> March 1, 2021 through March 31, 2021	<b>Contact:</b> Leonard Olien
<b>Comments From:</b> Canadian Renewable Energy Association	<b>Phone:</b> 587-971-0049
<b>Date:</b> 2021/03/30	<b>Email:</b> lolien@renewablesassociation.ca

Instructions:

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

**The AESO is seeking Stakeholder comments regarding the following questions related to the development of proposed amendments to ISO rules to enable energy storage (“Energy Storage ISO Rule Amendments”):**

	Development of a Proposed ISO Rule	Stakeholder Comments
1.	Do you agree or disagree that the issue identified in the letter of notice requires the proposed Energy Storage ISO Rule Amendments? Why or why not? Please comment.	<i>Yes. Energy storage market participation is not adequately explained in the current ISO rules</i>
2.	Do you agree or disagree with the potential purpose of the proposed Energy Storage ISO Rule Amendments? Why or why not? Please comment.	<i>CanREA supports consultation with Stakeholders on recommendations before the drafting of ISO rules.</i>
3.	Do you agree or disagree with the proposed consultation activities? Why or why not? Please comment.	<i>The consultation activities on the recommendations are sufficient. Further consultation will be required once the draft rules have been finalized.</i>
4.	Do you have any comments in relation to the prioritization of the development of the proposed Energy Storage ISO Rule Amendments or the related timeline? Please comment.	
5.	Do you agree or disagree with the AESO's recommendation regarding hybrid asset participation? Why or why not? Please comment.	<i>CanREA supports the recommendation regarding hybrid asset participation. The recommendation is flexible enough to allow market participants to operate their facility in an optimal way. In particular, hybrid assets with result in more efficient use of existing transmission infrastructure.</i>
6.	Do you agree or disagree with the AESO's recommendation regarding full-range participation? Why or why not? Please comment.	<i>CanREA supports the recommendation regarding full-range participation. The recommendation allows sufficient flexibility for market participants, who may still choose half-range participation if it supports optimal operation of the storage asset.</i>
7.	Do you agree or disagree with the AESO's recommendation regarding energy storage state of charge requirements? Why or why not? Please comment.	<i>CanREA agrees with the AESO recommendation regarding the state of charge requirement. CanREA encourages the AESO to engage in technical discussions with Stakeholders prior to drafting the ISO rules to ensure the rules do not result in a quick sequence of dispatch instructions that may be damaging to installed equipment.</i>
8.	Do you agree or disagree with the AESO's recommendation regarding energy storage commissioning requirements? Why or why not? Please comment.	<i>The AESO recommendation on energy storage commissioning requirements is a reasonable extension of the current requirements for commissioning of generation.</i>

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9.	Do you have any additional comments?	<i>CanREA is encouraged by the AESO efforts to develop market rules that reflect the unique nature of energy storage assets. We look forward to working with the AESO to ensure the evolving regulatory framework enables the delivery of the many services energy storage can provide.</i>