

# Stakeholder Comment Matrix – February 23rd, 2021

## DER Market Participation Draft Recommendations



<p><b>Period of Comment:</b> February 17th, 2021 through March 17th, 2021</p> <p><b>Comments From:</b> Direct Energy</p> <p><b>Date:</b> 2021/03/18</p>	<p><b>Contact:</b></p> <p><b>Phone:</b></p> <p><b>Email:</b></p>
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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 stakeholderrelations@aeso.ca **by March 17th, 2021.**

**The AESO is seeking comments from Stakeholders with regard to the following matters:**

	Questions	Stakeholder Comments
1.	<p>a) In your view, has the AESO’s approach reasonably addressed potential barriers to participation for Small DER in the energy and OR markets? Please comment.</p> <p>b) If significant barriers to participation in the energy and/or OR markets remain, what are they? Please comment.</p>	<p>a) Stakeholders could benefit from clarification of the technological requirements for Small DER participation. Small DER may require a large technological investment for participation which would prevent a customer from taking part.</p> <p>b) Technological requirements may be a barrier to entry for Small DER as a Small DER may not have the sophistication to fulfill the system requirements to submit bids.</p>
2.	Do you agree with the AESO recommendation to maintain ISO Rules Section 203.1 <i>Offers and Bids for Energy</i> (must offer) requirement for energy submissions for source assets 5 MW and greater? Why or Why not.	Yes – this should be maintained.
3.	Do you agree with the AESO recommendation of allowing voluntary participation in the energy market for small DERs 1 MW and greater? Why or Why not.	Yes – a small company could participate and seek to reduce demand charges (avoid peak) and actively manage the distribution components of the bill, which is a benefit and creates a more level market.

4.	Do you agree with the AESO recommendation of lowering the OR asset qualification thresholds to provide operating reserves for regulating reserve, spinning reserve, and supplemental reserve from the current requirement of 15 MW, 10 MW and 5 MW, respectively, to 1 MW? Why or Why not?	Yes – the reduction in the asset qualification thresholds allow more participants to provide operating reserves which enhances the flexibility of the market and should allow for more efficient outcomes.
5.	Do you agree with the AESO recommendation of allowing small DER (1 to 5 MW) participation in the OR market without a requirement to submit offers in the energy market? Why or why not.	Yes – this allow more participants to provide operating reserves which enhances the flexibility of the market and should allow for more efficient outcomes.
6.	Do you agree with the AESO recommendation of discontinuing exploration of aggregation options for small DERs in the energy market? Why or Why not?	No – the ability to aggregate options for small DERS is beneficial as it allows for more participation in the market.
7.	Do you agree with the AESO recommendation of discontinuing exploration of aggregation options for small DERs in the OR market? Why or Why not?	No – the ability to aggregate options for small DERS is beneficial as it allows for more efficient market outcomes. More participation allows for better price discovery.
8.	In your view, what is the priority and pace required to progress the recommendations? Do they need to be progressed now or can they be implemented in the future? Please comment.	These recommendations should be progressed as quickly as possible in order to advance the market.
9.	Do you have any concerns or suggestions on the DER market participation process and timeline? Please comment.	No comments.
10.	Do you have any other suggestions or comments you would like to share on DER market participation or the engagement activities? Please comment.	If the process created is expensive to implement, time consuming and administratively burdensome, Small DERS will not be likely to participate..

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