

Stakeholder Comment Matrix – February 23rd, 2021

DER Market Participation Draft Recommendations



<p>Period of Comment: February 17th, 2021 through March 17th, 2021</p> <p>Comments From: Enel North America</p> <p>Date: [2021/03/17]</p>	<p>Contact:</p> <p>Phone:</p> <p>Email:</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>	Enel supports the direction of the AESO in addressing the barriers to participation of small DER resources in the energy and OR markets.
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.	Enel supports this recommendation.
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.	Enel supports this recommendation.
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,	Enel supports this recommendation. As noted in previous comments filed by Enel, recognition has now been made that DER resources are smaller and can provide value in different ways than larg-scale traditional supply resources. As resources types evolve, so should the market design. The recommended requirement of 1 MW

	respectively, to 1 MW? Why or Why not?	threshold for qualification in OR will allow new resource types to provide value to the Alberta electricity system and the ratepayer and enable further competition in the OR market.
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.	Enel supports this recommendation.
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?	AESO has a fair and productive aggregation participation model which follows best practices. However, as DERs proliferate in AB, barriers may be identified and improvements may be recommended to enable greater participation. AESO should continue to consider improvements and recommendations as they are brought forward through public consultations.
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?	AESO has a fair and productive aggregation participation model which follows best practices. However, as DERs proliferate in AB, barriers may be identified and improvements may be recommended to enable greater participation. AESO should continue to consider improvements and recommendations as they are brought forward through public consultations.
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.	To enable the participation of DERs and therefore competition to provide resources to the AB market, Enel recommends moving forward with the recommendations immediately. This is especially true of recommendations where market rule amendments will be necessary such as lowering the minimum threshold for OR participation to 1 MW. By not enabling the 1 MW threshold, AB will continue to lose out on valueable, competitive, cost efficient resources.
9.	Do you have any concerns or suggestions on the DER market participation process and timeline? Please comment.	
10.		

Thank you for your input. Please email your comments to: stakeholderrelations@aeso.ca.