

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: Signalta Resources Linlimited</p> <p>Date: 2022/03/16</p>	<p>Contact:</p> <p>Phone:</p> <p>Email:</p>
---	--

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>	Yes, the ability for Small DER interested to voluntarily participate in the energy and OR market is a positive step forward. Many have been waiting for this opportunity.
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. Avoids changing the existing rules and the time and effort that would entail for further consultation. Allows proponents below 5MW (min 1MW) to voluntarily opt in to gain potential benefit and aids in the FEOC market. Many proponents may be either unable or unwilling to upgrade their facilities as the cost versus benefit may not be feasible for their specific installation so voluntary participation strikes the correct balance.
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. Small DER proponents can make their own economic decision to participate or not.

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. Small DER proponents can make their own economic decision to participate or not.
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. Small DER proponents can make their own economic decision to participate or not.
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?	Yes. With voluntary opt in lowered to 1MW, the Asset size limitation is no longer a concern. Most smaller facilities either would still be unable or unwilling to meet the aggregation requirements. If the data systems that can recognize generation levels less than 1 MW are changed in the future, the issue can be revisited.
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?	Yes. With voluntary opt in lowered to 1MW, the Asset size limitation is no longer a concern. Most smaller facilities either would still be unable or unwilling to meet the aggregation requirements. If the data systems that can recognize generation levels less than 1 MW are changed in the future, the issue can be revisited.
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.	The recommendations should be implemented as soon as reasonably possible. We've been advocating for the ability for Small DERs to participate in both the energy and OR market for some time. Most decisions take far too long to implement. This is a minor however significant change for the few smaller proponents who have wanted in to these areas for some time but have been prevented from participating.
9.	Do you have any concerns or suggestions on the DER market participation process and timeline? Please comment.	Not at this time.
10.	Do you have any other suggestions or comments you would like to share on DER market participation or the engagement activities? Please comment.	Not at this time.

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