

Stakeholder Comment Matrix – October 15th, 2020

DER Market Participation Options



Period of Comment: October 15 th , 2020 through October 30 th , 2020 Comments From: Direct Energy Date: 2020/10/30	Contact: Phone: Email:
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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 October 30th, 2020.**

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

	Questions	Stakeholder Comments
1.	In your view, are there barriers or issues with DER participation in the energy and/or OR market that should be addressed now? What are those barriers or issues and how should they be best addressed?	Direct Energy (“DE”) is a strong advocate for the creation of market rules that can withstand the test of time and allow for long-term investments in capital based on a stable operating environment. The consideration of DER in advance of the anticipated exponential growth in DER is to the benefit of all.
2.	Is it important for market participation for DER/small DCG to be addressed with market design changes now, or can this be deferred into the future? Can you identify priority items that should be addressed first?	This can be deferred into the future to a certain extent, but should be fully contemplated by 2025.
3.	If voluntary energy market participation were to be permitted for small DER (<5MWs), would you anticipate parties to use the opportunity to directly participate in the energy market? i.e. submit bids and offers, accept and respond to dispatches, comply with all applicable ISO rules? Why or why not? Please explain.	This may be an opportunity for central aggregators to manage aggregated assets on behalf of small generators. DE does not expect that the average homeowner would be interested in submitting bids and offers, following dispatch instructions or complying with ISO rules.

4.	<p>a) Do you support lowering the minimum market participation thresholds in the energy and/or operating reserves markets? Please provide rationale as to why or why not. If yes, to what level?</p> <p>b) Do you support lowering the minimum market participation thresholds now, or at a future date? Please explain.</p>	<p>Yes, DE is supportive of reducing the minimum to 1MW in the near term, as 5MW is not considered a small nameplate capacity.</p>
5.	<p>If market participation thresholds are lowered for energy and/or operating reserve market participation, is there a need to review aggregation rules surrounding market participation (outside of aggregation for the purpose of meeting the market participation threshold)? Please explain.</p>	<p>Yes, aggregation rules should be adjusted accordingly.</p>
6.	<p>When considering aggregation, has the AESO missed any essential components?</p>	<p>No.</p>
7.	<p>Do you have any concerns or suggestions on the DER market participation process and timeline?</p>	<p>No.</p>
8.	<p>Do you have any other suggestions or comments you would like to share on DER market participation or the engagement activities?</p>	<p>DE would like the FEOC operation of the market to continue so that there is a level playing field for all participants.</p>

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