

# Stakeholder Comment Matrix – Oct. 1, 2020

## Request for Feedback on Long-term Energy Storage Market Participation Options Paper



<b>Period of Comment:</b> Oct. 1, 2020 through Oct. 30, 2020 <b>Comments From:</b> Direct Energy <b>Date:</b> 2020/10/30	<b>Contact:</b> <b>Phone:</b> <b>Email:</b>
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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. **Please submit one completed matrix per organization.**
4. Email your completed comment matrix to [energystorage@aeso.ca](mailto:energystorage@aeso.ca) by **Oct. 30, 2020**.

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

	Questions	Stakeholder Comments
1.	Are there additional issues to energy storage market participation within the current ISO rules that AESO did not identify?	Direct Energy (DE) requests that the AESO clarify resource specific issues pertaining to batteries. DE believes that carbon tax should be considered based on the commodity consumed in the charging of batteries (i.e. coal is not “washed clean” by charging that occurs during predominantly coal powered hours). The desired outcome for DE is a level playing field which is mindful of the FEOC principles. DE would like to see a link to the FFR pilot project
2.	Are there additional options to energy storage market participation within the current market structure that AESO did not identify?	No.
3.	Do you agree with the evaluation of options?	Yes.
4.	Is full range market participation an important priority for energy storage right now; or is half-range providing required market	Full range market participation is important with transparency and clarity for all market participants. Once again, carbon intensity should be considered during charging for storage.

	access? Should full range market participation be deferred for investigation and implementation at a future date?	
5.	<p>Should Variable Energy Resources and Storage hybrids be permitted to participate?</p> <p>a. If no please explain why not</p> <p>b. If yes please provide a rationale as to why and how the dispatch variability issue should be addressed?</p>	<p>As long as rules are clear and applicable to all participants and all assets. Whether assets can be considered both a sink and a source or whether multiple asset ID (one as a sink and one as a source) will need to be created, or the creation of “virtual asset IDs” should be considered by the AESO. These are technical issues that should be considered in order to ensure rules are followed and enforceable, proper reporting can be performed, and bids and offers are distinguishable. Further, batteries behind load should be considered.</p>
6.	<p>How should storage and potentially other demand side resources be required to participate in the energy market?</p> <p>a. Must submit full range</p> <p>b. May submit full range</p> <p>c. Only submit discharge capability</p> <p>Please provide a rationale for your choice.</p>	<p>Resources should be required to submit full range.</p>
7.	<p>In regard to the full range market participation options, how do you feel the chosen option should land when trading off technology agnostic treatment and complexity against participation flexibility?</p>	<p>Technology agnostic should be the goal.</p>
8.	<p>Do you have any comments on defining the state of charge? Is there anything the AESO has not considered? Please explain.</p>	<p>Up to date “state of charge” information should be available to all market participants and included in the dispatchable resource information.</p>
9.	<p>Do you have any comments on the commissioning requirements for storage? Is there anything the AESO has not considered? Please explain.</p>	<p>As previously stated, the carbon intensity of the battery charging should be considered.</p>

10.	Do you have any concerns or suggestions on the energy storage market participation engagement process and timeline?	No.
11.	Do you have any other suggestions or comments you would like to share with the AESO related to the Long-term Energy Storage Market Participation Options Paper or the engagement activities?	The goal for DE is to continue to enhance the FEOC principles of the Alberta electricity market. In the view of DE, “out of market” payments lead to poor market outcomes and should be completely avoided.

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