

Period of Comment: March 1, 2021 through March 31, 2021	Contact: Nicole Black
Comments From: Direct Energy	Phone: (403) 463-3520
Date: 2021/03/30	Email: Nicole.black@directenergy.com

Instructions:

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

The AESO is seeking Stakeholder comments regarding the following questions related to the development of proposed amendments to ISO rules to enable energy storage (“Energy Storage ISO Rule Amendments”):

	Development of a Proposed ISO Rule	Stakeholder Comments
1.	Do you agree or disagree that the issue identified in the letter of notice requires the proposed Energy Storage ISO Rule Amendments? Why or why not? Please comment.	Direct Energy agrees with the majority of the issues identified in the letter. The primary concern of Direct Energy is that load is not unfairly burdened with the costs of enabling the participation of energy storage assets.
2.	Do you agree or disagree with the potential purpose of the proposed Energy Storage ISO Rule Amendments? Why or why not? Please comment.	Direct Energy agrees with the potential purpose for most amendment items but is of the view that full-range participation should be required by all.
3.	Do you agree or disagree with the proposed consultation activities? Why or why not? Please comment.	The proposed consultation activities allow for a fair evaluation of the market.
4.	Do you have any comments in relation to the prioritization of the development of the proposed Energy Storage ISO Rule Amendments or the related timeline? Please comment.	No comment.
5.	Do you agree or disagree with the AESO's recommendation regarding hybrid asset participation? Why or why not? Please comment.	Hybrid asset participation should require unique virtual meters for each asset - one as a sink and one as a source. A bid or offer should be provided for each virtual asset.
6.	Do you agree or disagree with the AESO's recommendation regarding full-range participation? Why or why not? Please comment.	Disagree. If an asset is taking power off the grid, there should be two asset IDs (either virtual or real). If the assets are not capable of meeting ongoing bid and offer requirements, they should not participate.
7.	Do you agree or disagree with the AESO's recommendation regarding energy storage state of charge requirements? Why or why not? Please comment.	Agree. This energy storage state of charge information should be provided in real time to the AESO for the benefit of the entire market.
8.	Do you agree or disagree with the AESO's recommendation regarding energy storage commissioning requirements? Why or why not? Please comment.	No comment.
9.	Do you have any additional comments?	Direct Energy is supportive of exploring the establishment of a congestion market, which works well in other jurisdictions in which Direct Energy operates.