

Period of Comment: March 1, 2021 through March 31, 2021	Contact: Saqib Chaudhary
Comments From: EPCOR Distribution & Transmission Inc.	Phone: 780-441-7109
Date: 2021/03/31	Email: schaudha@epcor.ca

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.	EPCOR has reviewed the letter of notice and also the recommendation summary. EPCOR does not have any comments on the 4 recommendations, however submits this response in regards to comments made in Section 1.3 of the Draft Recommendation document.
2.	Do you agree or disagree with the potential purpose of the proposed Energy Storage ISO Rule Amendments? Why or why not? Please comment.	See response to question 1.

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3.	Do you agree or disagree with the proposed consultation activities? Why or why not? Please comment.	<p>EPCOR is concerned with the assumptions made by the AESO, as described in section 1.3 of the Draft Recommendation document. More specifically, the third assumption which states:</p> <p>“The AESO’s current assumption is storage will be a market asset that may provide non-wires solutions, rather than a regulated asset capable of participating in the energy and ancillary services markets.”</p> <p>Recognizing that this consultation is focused “on the market design component of the Markets integration pillar” EPCOR is still concerned that the AESO has made pre-determinations on the eligibility of energy storage to qualify as a potential non-wires solution.</p> <p>In the quoted paragraph above, the AESO identifies two types of energy storage:</p> <ul style="list-style-type: none"> • a market asset that may provide non-wires solutions • a regulated asset capable of participating in the energy and ancillary services markets <p>EPCOR notes the energy storage can play a role as a regulated asset that is not participating in the energy or ancillary services market. For example, the Alberta Utilities Commission recently approved the addition of an energy storage system in Proceeding 26101 where “the electric energy from the energy storage system would not be exported to the AIES and that FortisAlberta would not be competing in the energy-only or ancillary-services markets”.</p> <p>As noted by EPCOR during the AUC’s Distribution System Inquiry, EPCOR’s view is that owners of distribution systems or transmission facility owners should be allowed, on appropriate terms, to own energy storage resources for utility purposes where such a resource is the most economical alternative.</p> <p>EPCOR is of the view that the role of energy storage as a regulated asset requires more consultation as energy storage as a regulated asset has the potential to provide benefits to customers.</p>
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.	It is not clear to EPCOR as to why the proposed recommendations are required at this time without further consultation on the treatment or use of energy storage as a regulated asset,

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5.	Do you agree or disagree with the AESO's recommendation regarding hybrid asset participation? Why or why not? Please comment.	See response to question 1.
6.	Do you agree or disagree with the AESO's recommendation regarding full-range participation? Why or why not? Please comment.	See response to question 1.
7.	Do you agree or disagree with the AESO's recommendation regarding energy storage state of charge requirements? Why or why not? Please comment.	See response to question 1.
8.	Do you agree or disagree with the AESO's recommendation regarding energy storage commissioning requirements? Why or why not? Please comment.	See response to question 1.
9.	Do you have any additional comments?	No.