

Stakeholder Comment Matrix – Oct. 1, 2020

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



<p>Period of Comment: Oct. 1, 2020 through Oct. 30, 2020</p> <p>Comments From: Greengate Power Corporation</p> <p>Date: 2020/10/30</p>	<p>Contact:</p> <p>Phone:</p> <p>Email:</p>
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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 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?	The AESO's longer term market participation document outlines potential changes to the treatment of storage that could make storage Market Participants offer on a distinct and different basis than other DTS load customers. This modification on the load or charging treatment of storage should not be contemplated unless the AESO implements a revised storage tariff. Storage should not be treated differently from other loads unless it is offered a tariff more in line with other Market Participants such as exporters and importers. Any distinction on the load treatment of storage should not be contemplated until a storage tariff is approved and implemented.
2.	Are there additional options to energy storage market participation within the current market structure that AESO did not identify?	
3.	Do you agree with the evaluation of options?	<i>The AESO's evaluation of the options is a reasonable approach. However the design principles are overlapping and complex and it is difficult to determine how the AESO will combine the assessment of each principle into its recommendation. Scoring the principles is very subjective and it seems like each alternative scored is close to the other alternatives. Some other higher level principles may be helpful such as: Fairness, minimize changes to existing rules, maximize value to consumers</i>

		<p><i>from storage participation. The visibility of the system operator needs to be a key factor however, the AESO's system operators have shown in managing dual use sites, that it can operate the grid even if net to grid output is reasonably opaque. More stringent rules for energy storage as compared to dual use sites should not be considered.</i></p>
4.	<p>Is full range market participation an important priority for energy storage right now; or is half-range providing required market access? Should full range market participation be deferred for investigation and implementation at a future date?</p>	<p><i>The full range advantages outlined by the AESO seem to all provide the benefit to the AESO while the disadvantages impact Market Participants. The half range works within existing rules. Greengate advocates that the full range should only be an option for Market Participants, not a requirement.</i></p>
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><i>Sites have already energized that are storage hybrids, therefore they should be allowed. The variability issue seems most concerning when a variable resource offers non-zero dollar offers. However, this currently does not occur. Therefore, this is currently not an issue. It seems reasonable that the AESO system controllers should have visibility on the state of charge for these type of assets. The AESO should also have the ability to review a site's past performance and determine if the Market Participant is withholding energy or simply charging their storage asset. Real time verification of following a dispatch may not be required, especially when so few storage assets are on the system. While it is helpful to have a vision of the future and rules that will last for decades to come perhaps it is best to design rules that will fit in the next several years and can be adjusted at a later date as the market unfolds.</i></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><i>Storage assets should submit discharge capability and only submit for a full range if desired by a Market Participant. The discharge capability will give the AESO's system controller required information to enable dispatch and market participation.</i></p>
7.	<p>In regard to the full range market participation options, how do you feel the chosen option should land when trading off</p>	<p><i>Generally Greengate supports the AESO allowing market participants to have full range market participation as an option. Generally the scoring of the alternatives in table 6 seems slanted in favor of the options that are best for the system controller</i></p>

	technology agnostic treatment and complexity against participation flexibility?	<i>and less so for the market participant. Further consultation is required to fully unpack each option for evaluation.</i>
8.	Do you have any comments on defining the state of charge? Is there anything the AESO has not considered? Please explain.	<i>It seems reasonable, if not a burden on Market Participants, to allow the AESO to have visibility on the state of charge.</i>
9.	Do you have any comments on the commissioning requirements for storage? Is there anything the AESO has not considered? Please explain.	<i>The rule change proposed to allow the Market Participant to have two offer blocks should allow the assets to be commissioned in a reasonable fashion.</i>
10.	Do you have any concerns or suggestions on the energy storage market participation engagement process and timeline?	<i>Given the complexity of the issues, it would likely be beneficial to stakeholders if the AESO held smaller group sessions to allow more two way dialogue. This will enable some debate to occur that would not be possible in the larger consultation sessions and an improved understanding of each option.</i>
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?	<i>Greengate advocates for a recognition on how connected the AESO storage tariff is with market rules and time significant changes appropriately. Greengate continues to advocate for a reasonable storage tariff.</i>

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