

Period of Comment: March 1, 2021 through March 31, 2021	Contact: Jordan Balaban
Comments From: Greengate Power Corporation	Phone: 403-630-4581
Date: 2021/03/31	Email: jordan@greengatepower.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.	<i>Agree. Energy storage market participation is not adequately explained in the current ISO rules, thus necessitating Energy Storage ISO Rule Amendments that will increase certainty for energy storage assets.</i>
2.	Do you agree or disagree with the potential purpose of the proposed Energy Storage ISO Rule Amendments? Why or why not? Please comment.	<i>Greengate supports consultation with Stakeholders on recommendations before the drafting of ISO rules.</i>
3.	Do you agree or disagree with the proposed consultation activities? Why or why not? Please comment.	<i>The consultation activities on the recommendations are sufficient. Further consultation will be required once the draft rules have been finalized.</i>
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.	<p><i>Greengate Power supports timely consultation and development of proposed Energy Storage ISO Rule Amendments. Greengate does not believe that the consultation and development of proposed Energy Storage ISO Rule Amendments should incur delays due to other initiatives underway with the AESO.</i></p> <p><i>It is important that rules are amended as soon as is feasible. Market participation clarity is essential to supporting development and deployment of energy storage projects in Alberta.</i></p> <p><i>Greengate requests that the AESO clearly communicates the anticipated timeline for the Energy Storage ISO Rule Amendments as soon as possible.</i></p>
5.	Do you agree or disagree with the AESO's recommendation regarding hybrid asset participation? Why or why not? Please comment.	<i>Greengate supports the AESO's recommendation regarding hybrid asset participation. Greengate applauds the AESO for including the hybrid asset configuration as a market participation option for co-located variable energy resources and energy storage. Hybrid asset participation will serve to increase utilization of grid infrastructure, and subsequently enhance the value of these assets to the Alberta electric system.</i>
6.	Do you agree or disagree with the AESO's recommendation regarding full-range participation? Why or why not? Please comment.	<i>Greengate supports the recommendation regarding full-range participation. Greengate appreciates and supports that energy storage proponents are granted flexibility to select half-range or full range participation. This will ensure that an energy storage asset, regardless of configuration, is capable of selecting a bidding mechanism that is suitable to the asset's intended use case(s).</i>

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7.	Do you agree or disagree with the AESO's recommendation regarding energy storage state of charge requirements? Why or why not? Please comment.	<i>Greengate agrees with the AESO's recommendation regarding state of charge requirements. It is encouraging that the AESO engages in technical discussions with Stakeholders to ensure the ISO rules do not result in a rapid issuance of dispatch instructions that could inflict unnecessary damage to installed equipment.</i>
8.	Do you agree or disagree with the AESO's recommendation regarding energy storage commissioning requirements? Why or why not? Please comment.	<i>The AESO recommendation on energy storage commissioning requirements is a reasonable extension of the current requirements for commissioning of generation.</i>
9.	Do you have any additional comments?	<i>Greengate appreciates the AESO's efforts towards creating a market participation framework that supports participation and operation of energy storage assets in the Alberta electricity market.</i>