

<b>Period of Comment:</b> February 17, 2021 through March 31, 2021	<b>Contact:</b> Craig Barnes
<b>Comments From:</b> TERIC Power Ltd. (“TERIC”)	<b>Phone:</b> 403.660.5236
<b>Date:</b> 2021/03/31	<b>Email:</b> craig.barnes@tericpower.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>TERIC believes that energy storage is playing a key role in the energy market and that it will continue to develop. Ensuring the rules allow for various purposes and configurations will foster grid stability, commercial opportunities, and, ultimately, a vibrant and reliable electricity market.</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>TERIC believes that the purpose of some of the proposed rule amendments are required, it also believes that in some cases the adjustment of tariffs may suit the same purpose without having to change a rule. See our specific comments re: rule changes in answers to 5, 6, 7, and 8 below.</i>
3.	Do you agree or disagree with the proposed consultation activities? Why or why not? Please comment.	<i>TERIC agrees that consultation with market participants &amp; stakeholders is an appropriate course of action to gather understanding and insight from those that will be affected by various rule changes.</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.	<i>TERIC believes that an appropriate level of pragmatism be employed with a recognition that storage technology is developing rapidly and has already made its way into the current market design and rules. Any rule changes must keep in mind the assets that have already been installed and are operating under the current structure to maintain a fair, efficient, and openly competitive environment.</i>
5.	Do you agree or disagree with the AESO’s recommendation regarding hybrid asset participation? Why or why not? Please comment.	<i>TERIC agrees that hybrid assets should be able to participate; however, the definition and applicability of a “hybrid asset” should be genericized to allow for a variety of configurations, beyond what is contemplated as “Energy Storage”. The configuration should allow for other dispatchable forms of electricity production, such as a simple-cycle turbine supporting a solar installation or a battery storage facility supporting a non-renewable generation source.</i>
6.	Do you agree or disagree with the AESO’s recommendation regarding full-range participation? Why or why not? Please comment.	<p><i>TERIC does not necessarily agree with the recommendation to change the ISO Rules. TERIC believes a more efficient method would be to address the needs from a tariff perspective to “level the playing field”, so to speak.</i></p> <p><i>When discharging to the grid, an Energy Storage facility receives Energy payment minus Line Loss. Alternatively, when charging from the grid, an Energy Storage facility pays Energy, Line Loss, Distribution &amp; Transmission charges. The disparity between charging and discharging could be equalized through effective rate design rather than changes to ISO Rules.</i></p>

	Development of a Proposed ISO Rule	Stakeholder Comments
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>TERIC agrees. The AESO's requirement for the System Operator to have visibility on the state of charge for Energy Storage facilities is reasonable to maintain grid stability.</i>
8.	Do you agree or disagree with the AESO's recommendation regarding energy storage commissioning requirements? Why or why not? Please comment.	<i>TERIC agrees. Modifying the commissioning rules rather than the AOR definition given that commissioning is not part of standard operating practice.</i>
9.	Do you have any additional comments?	<i>TERIC has no further comments at this time.</i>