

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: Utilities Consumer Advocate (UCA)</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?	<p>The UCA agrees and supports the AESO initiative to address the energy storage market participation within the current ISO rules and would like to bring the following considerations to the AESO's attention.</p> <ul style="list-style-type: none"> - The UCA would like a better understanding of the scope of this analysis regarding whether the AESO is considering only the transmission-connected energy storage or distribution-connected energy-storage or both. The UCA recommends that the AESO provide separate analysis at both the distribution and transmission levels as there may be different technical issues and considerations for each level of connection. In this regard, we also recommend that the AESO clearly identifies and considers the market access and participation of behind-the-meter storage at the residential, farm, and small commercial level. - The UCA recommends that the AESO provide a jurisdictional review regarding how ES is treated in other jurisdictions and develop the pros and cons of each option that could be implemented in Alberta. - The AESO may also provide analysis regarding how the ES owns by distribution and transmission owner will be treated in the future. Distribution facility owners (DFOs) and transmission facility owners ("TFOs") could potentially own ES to provide ancillary services for grid reliability purposes and not for selling into the

		energy market.. However, the UCA recognizes rules are also required for ancillary services in the distribution grid. The UCA recommends that AESO also considers a long-term initiative or coordination activity with DFOs that contemplate ES providing the ancillary service at the distribution system level.
2.	Are there additional options to energy storage market participation within the current market structure that AESO did not identify?	The AESO may investigate the options that other jurisdictions have adopted regarding the ES market participation and provide the pros and cons of those options that could be practical in Alberta.
3.	Do you agree with the evaluation of options?	The AESO may explain and evaluate the reason behind the dispatch variability issue more clearly when the variable energy resources and storage hybrids are permitted to participate and why this is not the case when these assets participate individually.
4.	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?	On page 5 of the report, it is mentioned that in the DSI, the AESO submitted "DER and Transmission Connected Generation (TCG) should continue to be treated consistently and is moving forward with the assumption that this will continue to be the case in the future". The UCA understands this statement is only related to the discharge period of the ES. It is important that the AESO continue to investigate the full range option in this initiative to clearly understand how the ES should be treated during the charging period, considering that the current bidding rules are designed for pure loads or exports. In this regard, the AESO may also examine how other jurisdictions treat the charging period of ES.
5.	Should Variable Energy Resources and Storage hybrids be permitted to participate? a. If no please explain why not b. If yes please provide a rationale as to why and how the dispatch variability issue should be addressed?	No comment.
6.	How should storage and potentially other demand side resources be required to participate in the energy market? a. Must submit full range	No comment.

	<p>b. May submit full range</p> <p>c. Only submit discharge capability</p> <p>Please provide a rationale for your choice.</p>	
7.	In regard to the full range market participation options, how do you feel the chosen option should land when trading off technology agnostic treatment and complexity against participation flexibility?	No comment.
8.	Do you have any comments on defining the state of charge? Is there anything the AESO has not considered? Please explain.	The AESO needs a clear definition and administration process regarding the ES's state of charge in the ISO rules to ensure that ES participants will not game the state of charge calculation in an effort to manipulate market outcomes.
9.	Do you have any comments on the commissioning requirements for storage? Is there anything the AESO has not considered? Please explain.	No comment.
10.	Do you have any concerns or suggestions on the energy storage market participation engagement process and timeline?	It would be helpful if the AESO shares a summary of the expertise and key learning that the AESO received from the industry learning forum (ESILF) with other stakeholders in this engagement session.
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?	See question 1.

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