

Stakeholder Comment Matrix – February 23rd, 2021

DER Market Participation Draft Recommendations



<p>Period of Comment: February 17th, 2021 through March 17th, 2021</p> <p>Comments From: Voltus Energy Canada Ltd.</p> <p>Date: 2021/03/05</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. Email your completed comment matrix to stakeholderrelations@aeso.ca **by March 17th, 2021.**

The AESO is seeking comments from Stakeholders with regard to the following matters:

	Questions	Stakeholder Comments
1.	<p>a) In your view, has the AESO's approach reasonably addressed potential barriers to participation for Small DER in the energy and OR markets? Please comment.</p> <p>b) If significant barriers to participation in the energy and/or OR markets remain, what are they? Please comment.</p>	<p>a) Yes.</p> <p>b) Prohibiting aggregation of assets by geographic zone (which is allowed for Supplemental Reserves) poses a barrier to participation in the Spinning Reserves market.</p>
2.	<p>Do you agree with the AESO recommendation to maintain ISO Rules Section 203.1 <i>Offers and Bids for Energy</i> (must offer) requirement for energy submissions for source assets 5 MW and greater? Why or Why not.</p>	<p>No comment.</p>
3.	<p>Do you agree with the AESO recommendation of allowing voluntary participation in the energy market for small DERs 1 MW and greater? Why or Why not.</p>	<p>Voltus agrees with this recommendation. Small DERs should be able to participate in the energy market if they are capable and desire to do so. The current rule poses a barrier to participation inconsistent with FEOC operation of markets.</p>
4.	<p>Do you agree with the AESO recommendation of lowering the OR asset qualification thresholds to provide operating reserves for regulating reserve, spinning reserve, and supplemental reserve from the current requirement of 15 MW, 10 MW and 5 MW, respectively, to 1 MW? Why or Why not?</p>	<p>Voltus agrees with this recommendation. However, we would like to better understand how the AESO intends to measure performance and conduct settlement for small assets, inclusive of all forms of DER and Demand Response (consistent with the definition of DER in American ISOs/RTOs, Demand Response <u>is</u> a DER). Currently, DER <5 MW SCADA requirements are defined by the DFOs and not visible to the AESO. If AESO maintains this 5 MW minimum requirement and unless more stringent DFO requirements are in place, how are small assets expected to comply with the SCADA requirements for OR participation?</p>
5.	<p>Do you agree with the AESO recommendation of allowing small DER (1 to 5 MW) participation in the OR market without a requirement to submit offers in the energy market? Why or why not.</p>	<p>Voltus agrees with this recommendation. Mandatory participation in the energy market if participating in the OR market would pose a barrier to participation in the OR market for small DERs and thereby reduce competition in the OR market.</p>
6.	<p>Do you agree with the AESO recommendation of discontinuing exploration of aggregation options for small DERs in the energy market? Why or Why not?</p>	<p>No comment.</p>

7.	Do you agree with the AESO recommendation of discontinuing exploration of aggregation options for small DERs in the OR market? Why or Why not?	Voltus agrees with this recommendation. Lowering the OR asset qualification thresholds to 1 MW will significantly reduce the need for aggregation in the OR market for most small DERs and the potential benefit of further aggregation options is limited. However, we do see the current prohibition against aggregating assets by geographic zone (which is allowed for Supplemental Reserves) as a barrier to participation in the Spinning Reserves market which should be addressed.
8.	In your view, what is the priority and pace required to progress the recommendations? Do they need to be progressed now or can they be implemented in the future? Please comment.	The recommendation to reduce asset qualification thresholds should be progressed now. The AESO thresholds are much higher than those of other North American jurisdictions and pose a significant barrier to participation.
9.	Do you have any concerns or suggestions on the DER market participation process and timeline? Please comment.	Voltus would like to see the OR Market Design initiative accelerated. We look forward to engaging in the stakeholder sessions throughout the conception and development phases in 2021.
10.	Do you have any other suggestions or comments you would like to share on DER market participation or the engagement activities? Please comment.	Not at this time.

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