

Stakeholder Comment Matrix – April 9, 2020

Overview of Short-term Market Implementation Requirements for Energy Storage Participation



Period of Comment: April 9, 2020 through April 27, 2020 Comments From: AltaLink Date: 2020/04/27	Contact: ██████████ Phone: ██████████ Email: ██████████
---	--

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 energystorage@aeso.ca by April 27, 2020.

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

	Questions	Stakeholder Comments
1.	Are there areas where further clarity on expected participation would be helpful?	<p>Tariff Treatment for Energy Storage Hybrid Facility.</p> <p><i>On page 10, the document states “Under the current tariff, energy storage facilities will be treated similar to all other facilities. Energy withdrawals from the AIES will be assessed rate DTS.” On the same page, the document further states that “A wind or solar facility located on the same site charging the energy storage facility will not incur DTS charges provided the energy flows are not withdrawn from the AIES.”</i></p> <p><i>It would be helpful for the AESO to clarify, for the purpose of tariff settlement, if totalization (i.e net metering) applies to an energy storage hybrid facility. If totalization is proposed for an energy storage hybrid facility, please provide the rationale for the AESO’s tariff treatment in light of Decision 23418-D01-2019 concerning the EPCOR E.L.Smith Solar Plant application as well as subsequent decisions on applications regarding self-supply and export.</i></p> <p><i>It is AltaLink’s understanding that based on the principles established through Decision 23418-D01-2019, unless the “site” for a hybrid facility is qualified as an ISD, energy consumption and export of any on-site generation should be considered to be a self-supply facility and should be separately metered on a gross basis, unless the facility is</i></p>

		<i>not exporting to AIES.</i>
2.	Are there areas of market participation that in your view need special consideration for energy storage that are not identified in the overview document?	<p>Connection Costs and AESO Investment.</p> <p><i>As energy storage facilities have unique characteristics of both generation and load, it would be important for the AESO to clarify its policies with respect to connection costs and its investment policy for connecting energy storage facilities.</i></p>
3.	Additional comments	<p><i>AltaLink is supportive of the AESO's intention to treat energy storage facilities like traditional power system facilities on an interim basis to enable the integration of storage facilities in the near term. However, in the longer term, AltaLink agrees with the AESO's underlying premise, as stated in the AESO's Energy Storage Roadmap, that energy storage is unique compared to traditional power system facilities. It will be important for the AESO to define Rules, Standards and Tariffs that are appropriate for each application of this unique type of asset in the future.</i></p> <p><i>AltaLink has submitted in the AUC's Distribution Inquiry proceeding that energy storage facilities can take on the role of a transmission facility under certain circumstances. Energy storage facilities as transmission should be investigated as part of the AESO's process.</i></p>

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