

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: Lionstooth Energy Date: 2020/04/27	Contact: [REDACTED] Phone: Email: [REDACTED]
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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 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?	Since the AESO intends to use Information Documents to provide additional clarity, it would be helpful to understand the AESO’s process for engagement, drafting, and implementing these IDs. How does the AESO plan to address an contentious IDs?
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>Does the AESO plan to rely on grandfathering concepts to account for any differences between the short- and longer-term phases / projects in development?</p> <p>As it relates to energy storage that is combined with other forms of generation, does the AESO have any views on self-supply and export?</p> <p>Has the AESO considered the impacts of the ongoing consultation on participant-related costs on both short- and longer-term phases / projects in development?</p> <p>How does must offer / must comply apply, especially during charging periods, for stand-alone and hybrid projects? Can the AESO expand on the concepts of “flexibility” in how an asset participates and is dispatched in the energy market? Please expand on “hybrid dispatch”.</p> <p>How does the AESO plan to report energy storage availability, given the additional</p>

		complexities of state of charge?
3.	Additional comments	<p>While we agree, energy storage and other forms of dispatchable generation, can act as non-wires alternatives, these are generation assets, not a regulated wires asset.</p> <p>We support the approach of Tx-connected storage incurring DTS and STS charges, or the appropriate distribution rates for two-way energy flows.</p> <p>Lionstooth notes that any market design treatment / options that are extended to storage would also need to be available to other customers that behave in a similar manner.</p> <p>As always, we encourage the AESO to consider the impact of two-way energy flows on the end-use customer, including those customers beyond the transmission system.</p>

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