

Stakeholder Comment Matrix – July 2, 2020

Request for Feedback on Energy Storage Industry Learnings Forum (ESILF) Kick-off Session Summary



Period of Comment: June 30, 2020 through July 31, 2020 Comments From: Farid Kachra Date: [2020/07/27]	Contact: Farid Kachra Phone: 403 592 8353 Email: Farid.kachra@gov.ab.ca
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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 evaluation per organization.**
4. Email your completed comment matrix to energystorage@aeso.ca by **July 31, 2020**.

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

Questions		Stakeholder Comments
1.	Is the publication of the ESILF kick-off session summary useful to you? Would any additional information be helpful? Please be specific.	The UCA finds the publication useful. However, the ESILF could provide additional information regarding how it plans to submit recommendations to the AESO regarding the identification and capturing of all the available value streams of storage. The summary could have identified information about the benefits of energy storage related to reduced transmission and distribution costs, as reducing delivery costs is the top priority for consumers.
2.	Below are the future workshop topics to be discussed. Are any topics missing that the AESO should to be aware of? Please be as specific as possible. <ol style="list-style-type: none"> 1. Economic modelling 2. Energy storage configuration options 3. Connection options 4. Market qualification parameters, process, models 	<p>The UCA recommends adding topics to the workshops, particularly focusing on energy storage as a non-wires-alternative and clear identification of all values provided by energy storage.</p> <p>The UCA recommends looking at all the values provided by storage, including benefits for retail customers and behind-the-meter (BTM) storage. The ESILF could explore and understand how self-supply would work for energy storage when market participants are charging the asset from on-site generation versus charging from the AIES. Another point that the ESILF could focus on is determining how energy storage could be considered in utility resource planning efforts.</p> <p>Other issues/matters ESILF could consider:</p> <ul style="list-style-type: none"> - Behind-the-meter (BTM) storage used for both retail and wholesale purposes. - Services that storage can provide. - Metering requirements for BTM storage participating in the wholesale market.

Questions	Stakeholder Comments
	<p>and data (SCADA) requirements</p> <p>5. Sharing of experiences in commissioning and testing of new technologies or configurations</p> <p>6. Storage as a transmission alternative (or a distribution alternative)</p> <p>7. Process efficiencies within our existing framework</p> <p>8. Markets opportunities in the energy and ancillary services markets, or other potential revenue streams</p> <p>9. Sharing learnings from other jurisdictions on legislation, regulations and policy</p>
3.	<p>Additional comments</p>
	<ul style="list-style-type: none"> - Limitations on utility ownership and operation of storage. - Methodologies for valuing transmission and distribution deferred investments, and customer level benefits. - Eligibility for aggregation and participation in utility programs. <p>With reference to the list of ESILF members posted on the AESO website, the UCA would like to see more intervener representation</p> <p>The UCA would like to explore the possibility of having a representative participating in the Forum meetings and discussions.</p>

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

Stakeholder Comment Matrix – June 30, 2020

Request for Feedback on Energy Storage Industry Learnings Forum (ESILF) Kick-off Session Summary



Period of Comment: July 3, 2020 through July 31, 2020 Comments From: ENMAX Date: 2020/07/07	Contact: Dallas West Phone: 403-689-6669 Email:
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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 evaluation per organization.**
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The AESO is seeking comments from Stakeholders with respect to the following matters:

Questions		Stakeholder Comments
1.	Is the publication of the ESILF kick-off session summary useful to you? Would any additional information be helpful? Please be specific.	Yes, this summary is helpful in providing a consistent summary of the activities of each meeting which can then be distributed throughout an organization for consistency.
2.	Below are the future workshop topics to be discussed. Are any topics missing that the AESO should be aware of? Please be as specific as possible. <ol style="list-style-type: none"> 1. Economic modelling 2. Energy storage configuration options 3. Connection options 4. Market qualification parameters, process, models and data (SCADA) requirements 5. Sharing of experiences in 	A suggested addition would be to review the market application requirements for market participants currently in the connection queue. I.e.) Is additional testing required of energy storage projects to prove frequency control ability, and if so, should this also be required for traditional generators?

Questions	Stakeholder Comments	
	<p>commissioning and testing of new technologies or configurations</p> <p>6. Storage as a transmission alternative (or a distribution alternative)</p> <p>7. Process efficiencies within our existing framework</p> <p>8. Markets opportunities in the energy and ancillary services markets, or other potential revenue streams</p> <p>9. Sharing learnings from other jurisdictions on legislation, regulations and policy</p>	
3.	Additional comments	<p>In keeping with ENMAX’s comments that were recently submitted to the AESO on its proposed DER Roadmap, ENMAX would like to highlight that the AUC’s Distribution System Inquiry recently concluded, and it is expected that a final report will be issued by the Commission in early fall 2020. As the AESO is aware, energy storage was a main topic of discussion throughout the inquiry and in order to avoid duplication of work, the AUC’s report should be referenced to help guide and inform future processes being considered through the AESO’s Energy Storage Industry Learnings Forum.</p>

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

Stakeholder Comment Matrix – July 2, 2020

Request for Feedback on Energy Storage Industry Learnings Forum (ESILF) Kick-off Session Summary



Period of Comment: June 30, 2020 through July 31, 2020 Comments From: Greengate Power Corporation Date: 2020/07/31	Contact: Jordan Balaban Phone: 403 930 1300 Email: jordan@greengatepower.com
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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 evaluation per organization.**
4. Email your completed comment matrix to energystorage@aeso.ca by **July 31, 2020**.

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

Questions		Stakeholder Comments
1.	Is the publication of the ESILF kick-off session summary useful to you? Would any additional information be helpful? Please be specific.	Yes, the summary is useful for Greengate and other interested parties that are not currently a member of this Forum.
2.	Below are the future workshop topics to be discussed. Are any topics missing that the AESO should to be aware of? Please be as specific as possible. <ol style="list-style-type: none"> 1. Economic modelling 2. Energy storage configuration options 3. Connection options 4. Market qualification parameters, process, models 	<p>For many storage assets the key issue is an effective and economic AESO and DFO storage tariff. As stated in the Distribution inquiry by Energy Storage Canada, for stand-alone energy storage the current AESO tariff using a reasonable analysis equates to a \$130/MWh charge for grid access for stand-alone storage assets. Until the AESO tariff situation is rectified this level of tariff will reduce the amount of storage that connects to the system.</p> <p>The AESO announced on July 27, 2020 that Phase 1 of its tariff (Bulk, Regional and Energy Storage) will now not be filed until March 31, 2021. This is a significant delay. It is highly likely that this AUC proceeding will be complex and lengthy. The 2020 AESO tariff began consultation in 2016, and may be implemented by the end of 2024, a 4 year process. Given this past process, it is possible that the storage tariff may not come into place until 2024. This process seems overly</p>

Questions	Stakeholder Comments
<p>and data (SCADA) requirements</p> <ol style="list-style-type: none"> 5. Sharing of experiences in commissioning and testing of new technologies or configurations 6. Storage as a transmission alternative (or a distribution alternative) 7. Process efficiencies within our existing framework 8. Markets opportunities in the energy and ancillary services markets, or other potential revenue streams 9. Sharing learnings from other jurisdictions on legislation, regulations and policy 	<p>lengthy and will likely cause new stand-alone storage and potentially other storage assets to wait to proceed with their projects until clarity is received on specific tariff economics.</p> <p>In turn, the lack of an effective storage tariff will cause delays in evaluating storage as an alternative to transmission or distribution wires solutions, since the grid economics of storage will be unknown. Private storage developers will need to know the cost of grid access to bid on potential wires solutions. The AESO has proposed significant wires expenditures over the next few years that may be reduced or deferred with the use of storage as a wires alternative. Therefore, expediting an effective storage tariff should be a priority. If coordination with the Bulk and Regional tariff design is required, this coordination could occur during Q4, 2020.</p> <p>Greengate generally supports the AESO's list of workshop topics but recommends that the AESO prioritize the list. Greengate recommends that discussions on the storage tariff should be top of the list. The Learnings Forum should be empowered to discuss the storage tariff in addition to the public consultation on a storage tariff, subject to the continuing practice of publicly sharing ESILF meeting summaries.</p> <p>Greengate strongly advocates for a separation of the storage tariff from the Bulk and Regional process. If separated, perhaps the storage tariff could be filed by the end of 2020 and approved much sooner than the Bulk and Regional tariff. This expedited process will help to facilitate storage assets connecting to the grid and allow the AESO to properly evaluate storage as a non-wires alternative.</p>
<p>3. Additional comments</p>	<p>Thank you for the opportunity of providing comments.</p>

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