Stakeholder Comment Matrix – June 10, 2020

DER Roadmap

Date of Request for Comment: June 10, 2020
Period of Consultation: June 10, 2020 through July 10, 2020
Comments From: Energy Storage Canada
Date [yyyymm/dd]: 2020/07/14

Contact: Justin W. Rangooni, Executive Director
Phone: 647.627.1815
Email: jranooni@energystoragecanada.org

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 July 10, 2020.

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

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
</table>
| Did you identify any content gaps in the DER Roadmap? If yes, please explain. | • DERs can offer services to the AESO market as well as directly to customers and grid operators (e.g., DFOs/TFOs). The DER Roadmap should consider the coordination and participation requirements for DERs offering multiple services to multiple parties.  
  • In addition to the above point, the DER roadmap should include a discussion on which entities should lead aspects of DER Roadmap evolution. For example, visibility requirements of DERs could be set by the AESO with additional requirements included for each DFO/TFO. On the other hand, visibility requirements could be set by the DFO/TFO and compiled by POD or Feeder before being passed along to the AESO. The responsible entity will be critical for defining roles and responsibilities for DER databasing, forecasting, planning and operational coordination.  
  • The DER Roadmap could be heavily influenced by government policy and regulatory changes. For example, changes to the Transmission Regulation would influence the foundation of system planning in the province. Given the ongoing consultations with respect to Bulk & Regional Tariff design as well as Substation fractioning, the DER Roadmap should include a description of how future government policy and regulatory changes will be coordinated and incorporated.  
  • Discussion on how timelines for activities were arrived at as well as which supersede other activities would be helpful information. Evolution of the market design for DERs is complex and requires coordination between different areas of expertise. Providing the linkage and explaining priorities would be useful in understanding where stakeholders should focus their analysis and participation. |
| Did you find value in the publication of the DER Roadmap? Would any additional information be helpful? How can it be improved? | The publication of the DER Roadmap was informative and useful for Energy Storage Canada. There are a number of related electricity market activities (e.g., Alberta Utility Commission Distribution System Inquiry, AESO’s Energy Storage Roadmap) that appear to be incorporated into the DER Roadmap.  
Energy Storage Canada believes that the DER Roadmap concentrates on many of the important changes required to integrate energy storage resources into the Alberta electricity market: 
- Changes to forecasting and planning are required to ensure energy storage resource attributes are understood in relation to reliability standards (e.g., supply adequacy, operating reserve needs, outage management). Energy Storage Canada is encouraged that both are prominent in the DER Roadmap action plans.  
- Coordination of planning and operations with TFOs/DFOs will be particularly important for integrating energy storage resources providing multiple services to different entities. Energy Storage Canada is looking forward to participating in the Tx/Dx Coordinated Planning Framework initiative. 
Further information on how the timelines for the DER roadmap were determined would be useful in understanding the priority of activities. 
Information on any sub-activities or stakeholder engagements planned for specific activities would be beneficial. In particular, Energy Storage Canada is interested in providing input on changes to the planning framework and operational coordination between the AESO/DFOs/TFOs; however, it is not clear where those engagement forums will take place. |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you have suggested changes to the activity timing in the DER Roadmap Integrated Plan? If yes, please be specific to why you would like to see the timing changed and what the suggested timing should look like.</td>
<td>Energy Storage Canada believes that the Bulk &amp; Regional rate design should be accelerated for energy storage resources. The treatment of energy storage resources, which are not end-use customers, is important in determining the economics for storage in Alberta.</td>
</tr>
<tr>
<td>Are you aware of any recent DER research/resources/information that would provide the AESO more insight on this topic? If yes, please provide details or explain.</td>
<td>Analysis of DER integration into electricity markets is rapidly growing. Much of the recent research has been provided in the ongoing Alberta Utility Commission Distribution System Inquiry.</td>
</tr>
</tbody>
</table>