Stakeholder Comment Matrix – April 21, 2020

2020 Plan for Energy Storage Roadmap Integration Activities

Period of Comment: April 21, through May 5, 2020 **Comments From:** AltaLink **Date:** 2020/05/05	**Contact:** [redacted] **Phone:** [redacted] **Email:** [redacted]

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 May 5, 2020**.

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

	Questions	Stakeholder Comments
1.	Is the publication of the *2020 Plan for Energy Storage Roadmap Integration Activities* ("2020 Plan") useful to you? Would any additional information be helpful? Please be as specific as possible.	Yes, the publication of the *2020 Plan for Energy Storage Roadmap Integration Activities* ("2020 Plan") has been useful to AltaLink. However, AltaLink has some concerns with how the AESO has made decisions on certain energy storage issues prior to consulting with stakeholders as part of this forum. AltaLink is of the opinion that the most efficient result for ratepayers will come as the result of an effective stakeholder consultation process where the AESO will carefully evaluate all options through an industry collaborative approach using agreed upon principles prior to making any final decisions.
2.	Are there additional energy storage activities that in your view require the AESO's and stakeholders' attention in 2020 that are not listed in the 2020 Plan?	AltaLink recommends the AESO include a new activity under Phase 2 Long-term Implementation titled "Storage as Transmission" (SaT) or Transmission Only Energy Storage. The SaT activity should be carried out in parallel with what is currently planned for SATA (or Transmission plus Market Energy Storage) with a similar scope such as: identify the different use cases for energy storage which are benefitical for transmission, develop evaluation criteria and quantification of benefits, identify technical parameters and configurations, and assess ownership options. The addition of a SaT work stream will not result in a delay to the energy storage roadmap process as the work stream can be executed in parallel to SATA.

		A SaT facility is configured to provide reliability and other grid services for optimizing grid operation. The evaluation of SaT's benefits should include cost savings from the deferral or replacement of traditional transmission facilities and from reducing volumes of services to support grid operations which are procured through the ancillary services market. In the conceptualization phase, the AESO should compare both SaT and SATA based on a set of principles that take into account cost/benefit, risk to customers in terms of reliability performance, and impact on the FEOC market. The objective is to define under what circumstances/use cases a SaT facility would deliver a better outcome than SATA in terms of minimizing costs to consumers, delivering reliable transmission services, and minimizing market impacts from a FEOC perspective. Transmission only SaT facilities are characterized by being high capacity, short duration discharge with no or negligible energy exchange with the AIES and no operational synergies with market incentives. SATA or Transmission plus Market Energy Storage facilities tend to be long duration and have large amount of energy exchange with the AEIS in order to capture value from markets that is synergistic to its operation for reliability support. An example of SATA would be an energy storage facility configured for delaying transmission transmission for integerating renewables to reduce/remove congestion. In AltaLink's view, both SaT and SATA could potentially help optimize the transmission grid under unique circumstances. The Roadmap process should evaluate both options and strive to find the ideal balance with stakeholder input that results in the most effcient design for Alberta customers and market participants.
3.	Do you have suggested changes to the timing of activities in the 2020 Plan schedule? If yes, please be specific to why you would like to see the timing changed and what the suggested timing should look like.	The timeline for SATA and AltaLink proposed activities regarding SaT should be aligned to allow for an effective comparison between the two options. AltaLink believes that this can be accommodated within the AESO's current process schedule. In the event the AESO believes more time is required for analyzing SaT, during the Analysis Phase, the timeline should then be extended for the SATA Analysis phase.
4.	Do you have any other suggestions or comments you would like to share with the AESO related to the 2020 Plan?	AltaLink appreciates the opportunity to provide comments on the 2020 Plan and encourages the AESO to make adjustments based on stakeholders' input where reasonable.

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