

Energy Storage Design Project – Feedback Form

July 23, 2020

<u>Date Submitted:</u> <i>2020/08/13</i>	<u>Feedback Provided By:</u> Company Name: EDF Renewables Canada Inc Contact Name: David Thornton Contact Email: [REDACTED]
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In light of the additional information provided in the July 23 Energy Storage Advisory Group (ESAG) presentation, the IESO is again seeking stakeholder feedback on whether the State-of-Charge (SoC) Management Lite proposal offers a pragmatic solution for the participation of energy storage in the IESO-Administered Markets in the long-term. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation and design document can be found under the July 23, 2020 entry on the [ESAG webpage](#).

Please provide feedback by August 13, 2020 to engagement@ieso.ca. Please use subject: *Feedback: Energy Storage Design Project*. To promote transparency, this feedback will be posted on the [ESAG webpage](#) unless otherwise requested by the sender.

Thank you for your time.

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Topic

State-of-Charge (SOC) Management:

The IESO has proposed an SoC Management Lite approach that will provide the same market access as a generator and account for the practical operating realities of a storage facility

Feedback:

EDF thanks the IESO for providing greater clarity on the SOC Management Lite design proposal. As a preliminary design decision, EDF supports the proposal.

However, there are a number of areas where further details will be required. For example, when in the scheduling process the SOC management constraints will be applied is important. During the day-ahead scheduling process, there is an error margin in the IESO's demand forecast. If the SOC management restricts the schedules of energy storage resources too early the flexibility benefits of energy storage will be limited. Details on the parameters and application of the SOC management are required.

General Comments and Feedback:

The SDP project has appropriately begun the integration process for energy storage resources into the IESO-Administered Markets (IAM). The IESO has been clear that the Market Renewal Program (MRP) will not include the full integration of energy storage resource due to resource constraints. The MRP process has proceeded through a number of stages: preliminary design, high-level design, detailed design, market rules/manuals amendments and implementation.

In EDF's view, the long-term phase of the SDP is equivalent to the preliminary design phase. The IESO must establish a timeline and process for the proceeding stages to implement the design decisions discussed in the SDP. As the IESO and stakeholders proceed through the process, adjustments and amendment to the design decisions may be required as greater details and issues are discussed. EDF strongly recommends that the IESO establish a similar process as MRP to ensure implementation for energy storage is timely. In particular, the implementation of storage design decisions should proceed in step with the MRP, albeit delayed compared to the MRP timelines. This way, the storage process can incorporate MRP implementation into the storage design decisions.