

# Energy Storage Design Project – Feedback Form – July 23, 2020

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## Submission

**Date Submitted: 2020/08/13**

**Feedback Provided By:**

Company Name: Electricity Distributors Association (EDA)

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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](mailto: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**

While the EDA appreciates the additional detail provided during the webinar with respect to the application of the proposed SOC-lite approach, and in response to the feedback that the EDA provided to the IESO in June 2020, we note that the IESO has declined to provide further analysis related to either risk assessment or to the alternative processes for managing risk associated with infeasible dispatch instructions.

We continue to seek this additional detail and analysis so that the implementation of the long-term design will achieve the desired outcomes.

### **General Comments/Feedback**

EDA members continue to express interest in energy storage, for example as it relates to the use of energy storage as a non-wires alternative. We look forward to the IESO's next steps as it develops its long-term storage design proposals.