

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

## Submission

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**Feedback Provided By:**

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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.

## Energy Storage Design Project – Feedback Form

### **General Comments/Feedback**

Ontario Power Generation (OPG) appreciates the opportunity to provide feedback on the recent Energy Storage Working Group (ESAG) webinar, which was presented by the IESO on July 23rd, 2020.

During the stakeholder session, the IESO mentioned that the IESO SDP enduring storage vision will not be part of the MRP, and as a result there will be a period during MR “go-live” where there will need to be a “2nd Interim Design”, to ensure the framework implemented during the Interim Period design is not lost. The IESO should provide clarity around what will be included in this “2nd Interim Design”, and if there is a risk that the Interim Design changes that are currently going through the Market Rule/Manual review would potentially not continue through and beyond the MRP process.

OPG believes the Interim design changes should be able to be easily implemented into MRP, with minimal disruption, as it does not require any significant tool changes or adaptations to the DSO or MRP design. The proposed changes to the Market Rules and Manuals for the Interim SDP, should be transferred during the MRP to avoid duplication of work once MRP is in the “go-live” phase. This inefficiency comes at a cost to the IESO and stakeholders who have dedicated significant time to this process.

The IESO needs to clarify how the enduring storage design project can proceed through Market Renewal, as there needs to be a clear path to implementation.

### **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

OPG supports the IESO's recommendation of SoC Management Lite approach. However, as stated before, OPG would prefer the design include optionality to have Self-SoC management options for Energy Storage Resources (ESRs) that are complex and would benefit from management solely by MPs. Exploring options such as allowing 'Infinite SoC' where it enables a facility to monitor and control their own parameters through market offers and bids. EPRI had previously presented that other jurisdictions have multiple SoC Management options available to participants that were dependent on the ESRs technology needs.

OPG is pleased to hear that the MRP vendor ABB, will have the functionality to implement SoC Management Lite, and the new DSO will be able automatically manage overlapping offers/bids and changes in the Mandatory window with regards to SoC for Energy and OR, and continuous offer curves. In order to facilitate the most effective solution, the IESO should provide clarity and transparency with regards to their discussions with ABB, and inform participants exactly what design principals are readily available with the vendor, and what capabilities the vendor has with regards to integrating ESRs in the market. MPs should have a sense of which design principals still need to be developed/created, as this will give MPs a sense of clarity on which design proposals have a high chance for success in the Long-Term Storage Design.