

Energy Storage Design Project Feedback

Form- June 24, 2020

Stakeholder Feedback Form

Date Submitted:	July 15, 2020
Feedback Provided by:	
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Following the June 24, 2020 Energy Storage Advisory Group (ESAG) meeting to discuss the Energy Storage Design Project, the IESO is seeking feedback from participants on the draft redlined Market Rules and Manuals and the recommended approach to uplift charges. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage. The referenced presentation and associated redlined Market Rules and Manuals can be found under the June 24, 2020 entry on the [ESAG webpage](#).

Please provide comments relating to the section of the draft amendments in the corresponding box in table 1 below. Please include any views on whether the draft language clearly articulates the requirements for either the IESO or market participants , and provide any alternative language by inserting the draft language and red-lining the suggested changes (example below). Further, please provide comments relating to the uplift proposal in table 2 below.

Redlined Market Rules and Market Manuals

Chapter or MM Name	Section Reference	Stakeholder Comments
E.g., Ch7	E.g., Section 21.2	Stakeholder comment
E.g., MM 4.2	E.g., Section 1.2	Stakeholder comment

Please provide feedback by July 15, 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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Table 1: Redlined Market Rules and Market Manuals

Chapter or Market Manual Name	Section Reference	Stakeholder Comments
n/a	n/a	The amendments to the IESO Market Rules and Market Manuals appear to adequately capture the interim proposal of the Energy Storage Design Project. The EDA has no additional comments.

Table 2: Uplift Charges

Topic	Feedback
Proposal: Storage should be exempt from uplift charges on 'fuel'	<p>The EDA supports the proposed approach; it addresses the concerns raised by energy storage providers as summarized by the IESO in its report “Removing Obstacles for Storage Resources in Ontario”. The EDA agrees that the exemption should only apply to energy withdrawn for the sole purpose of providing services back to the grid.</p> <p>The EDA looks forward to the IESO detailing the implementation of this approach (e.g., definitions, formulas)</p>
General Comments/Feedback	<p>The EDA acknowledges that the IESO has determined that the enduring storage design (i.e., per long-term design proposal) is out of scope of the MRP and that as a result the IESO will need to adapt its interim design. The EDA recommends that the IESO conduct additional stakeholdering on the Market Rule and Market Manual amendments required to appropriately implement an adapted interim design. The EDA assumes that these changes will need to be implemented in parallel with the implementation of MRP (i.e., for a projected ‘go-live’ March 2023 date).</p>