

# Energy Storage Design Project – Feedback Form

March 26, 2020

<b>Date Submitted:</b> <i>2019/04/16</i>	<b>Feedback Provided By:</b> Company Name: Capital Power Corporation
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Following the March 26, 2020 Energy Storage Advisory Group (ESAG) webinar to discuss the Energy Storage Design Project, the IESO is seeking feedback from participants on the state-of-charge (SoC) management options. 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 March 26, 2020 entry on the [ESAG webpage](#).

**Please provide feedback by April 16, 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.

Topic	Feedback
<p>What design principles and considerations (as listed in March 26 webinar deck) are most important to you in developing a state-of-charge management framework and why?</p> <p>E.g., efficient market outcomes, the ability for storage to compete on a level playing field, a practical approach that could be implemented on a timely basis, etc.</p>	<ul style="list-style-type: none"> <li>The principles of competition and ensuring a level playing field are the most important principles for guiding the IESO’s design of its state-of-charge management framework. The principles of competition and efficiency - both tenets of the MRP - are critical aspects of any electricity market design and Capital Power generally objects to market design decisions that prioritize considerations such as, “a practical approach that could be implemented on a timely basis”, over competition and efficiency.</li> </ul>
<p>Based on the Storage Design Project principles and considerations, what state-of-charge management option(s) do you support and why?</p> <p>E.g., Self-Schedule, Self-SoC-Management, SoC-Management-Lite, ISO-SoC-Management</p>	<ul style="list-style-type: none"> <li>Capital Power supports the option of Self-Management of SOC. This option best ensures a level playing field between storage and other resources in a competitive and efficient market.</li> </ul>

**General Comments/Feedback:**

It is understood that the IESO is looking to prioritize its Stakeholder Engagement streams so that it can focus on those design activities of critical importance to the market and market participants. The IESO may want to consider whether its work plan for Long Term Design should be paused until the future of critical priority Stakeholder Engagements such as Resource Adequacy and the IESO’s Planning Outlook have been addressed. As these Engagements move forward, it is imperative that the IESO’s market design support a “level playing field” and that long-term procurement mechanisms are technology agnostic. While not under consideration by ESAG at this time, should the IESO design an RFP for long term supply contracts sometime in the future, these contracts should not discriminate, nor lead to discrimination, based on resource type. A level playing field for providers of capacity is necessary for the long-term competitiveness, efficiency and reliability of the IESO-Administered Markets.

