# Panel Discussion: Address Policy Barriers to Widespread Storage

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## **ISO Barriers to Widespread Storage**

- Size
- Rules
- Economics



#### **ISO Barriers - Size**

- ISO New England Operations Systems typically meant for sizes above 1 MW
- Accuracy of dispatching below that level is questionable
- ISO function is at the wholesale level which in in the thousands of MW at all times
- ISO systems are meant to handle hundreds or thousands, not ten of thousands or millions (electric vehicles)
- Current changes to dispatch software allows some control of ten of thousands of demand assets grouped into thousands of resources



#### **ISO Barriers - Rules**

- Current rules do not expressly preclude storage (as I stated in an earlier presentation we have other storage devices)
- Current rules (and systems) generally treat storage as separate devices
  - One device that consumes energy
  - One device that produces energy
- Current rules do not create a link between "devices"
- No effort has been made to determine what rules would need to change and how to change them
- Changes the rules is a long process in the ISO world
  - Any rule change is met with question of cost versus benefit



#### **ISO Barriers - Economics**

- Cost/Benefit Analysis for making any changes may fail in many cases
- Assume that short-term storage can only provide two service to the market
  - Shifting Energy Consumption from one period to another during the same hour(s)
  - Provide Regulation control (frequency control) to the system
- Usually within an hour or two prices do not diverge enough for short-term storage to make a material impact on market costs
  - The may not be true if more intermittent resources are running in the system



# ISO Barriers – Economics (Regulation)

- Regulation Market total dollars in 2010 was around \$14.5 million (as comparison energy was \$5 Billion)
  - Broken down further:
    - ~\$4.5M for Time on Payment (Capacity)
    - ~\$4.5M for Service Payment (Mileage or movement)
    - ~\$5.5M for Opportunity Cost (Energy Market "make-whole")
- What could be the market benefit if all Regulation was provided by short-term storage?
  - Could displace the Opportunity Cost completely (assuming these resources would not be "dispatched" in energy market so they would have no lost energy market opportunity
  - Let's say they only displace that cost then potential saving to the market are \$5 Million a year.
  - That leaves less than \$10M in revenue for these resources



#### **ISO Barriers – Economics Questions**

- Is \$5M in savings enough to incent the market participants to act on making changes to the design to get these resources?
- Is \$10M in revenue enough to incent these resources come to the market?
- These are the questions that need to be answered by our stakeholders before we can address any issues
- Our Alternative Technology Regulation Pilot program has only attracted 1-2 MW (while it had a limit of 13 MW), this only meets 1% of the Regulation Requirement
- Unless more resource provider come forward and can provide a higher percentage of the requirement, how can the market see enough savings to meet the cost/benefit ratio?
  - Cost of implementing systems and processes would not be insignificant



## What can the ISOs do to help?



