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SUBMITTED VIA ELECTRONIC MAIL TO ENGAGEMENT@IESO.CA

September 9, 2019

IESO Stakeholder Engagement

Re: Capacity Auction Stakeholder Engagement

Advanced Energy Management Alliance (“AEMA”), is an alliance of providers and supporters of distributed energy resources, including demand response (“DR”) and distributed generation, united to advocate for policies that empower and compensate customers appropriately in a manner which contributes to a more efficient, cost effective, resilient, reliable, and environmentally sustainable grid. AEMA members are pleased to provide the following comments based on the August 22, 2019 stakeholder engagement meeting for the Capacity Auction. These comments represent the views of the organization as a whole, not those of any one member.

1. Alignment with the Energy Payments for Economic Activation of DR Resource stakeholder engagement

AEMA recommends that the timing of the second Capacity Auction, align with the decision by the IESO on the Energy Payments for Economic Activation of DR Resources engagement to ensure that participants have time to prepare their bid strategies for the June 2020 Auction with the most up to date information. At least 20 business days in advance of the Auction from the IESO decision is recommended. The Capacity Auction engagement and the Energy Payments engagement should remain aligned and coordinated.

2. Inclusion of Reconfiguration Auctions in the Capacity Auction Work Plan

Reconfiguration auctions had been identified as a priority in the Demand Response Working Group for subsequent Demand Response Auctions (“DRA”), and was listed on the DRA work plan. AEMA recommends that this topic be included on the Capacity Auction work plan. As identified in the DRA work plan, reconfiguration auctions are an important tool for market participants to amend their commitments.

This topic is even more important in the Capacity Auction as the forward periods will be increasing beyond the forward periods of the DRA. For example, the December 2020 auction will be procuring resources for the 2022-2023 delivery year.

Thank you for the consideration of these comments. AEMA members look forward to continuing to contribute to the design of the Capacity Auction through this stakeholder engagement. Please feel free to contact me should you have any questions at Katherine@aem-alliance.org or +1-202-524-8832.

Best regards,

A handwritten signature in black ink, appearing to read "Katherine Hamilton". The signature is fluid and cursive, with the first name "Katherine" being more legible than the last name "Hamilton".

Katherine Hamilton
Executive Director
Advanced Energy Management Alliance