

Non-Emitting Resources Request for Information

Feedback on the Draft Phase 1 RFI – March 21, 2018

On February 16, 2018 the IESO posted a draft version of its Phase 1 Non-Emitting Resources Request for Information (RFI), for stakeholder review and feedback. The IESO invited stakeholders to provide written feedback by March 2, 2018.

The IESO received written feedback from the following stakeholders (listed in alphabetical order) by the deadline:

- Consortium of Renewable Generators and Storage Providers
- DER AC
- HydroStor Inc.
- ITC Holdings
- Kelvin TE
- Ontario Waterpower Association
- TransCanada Energy

This feedback has been posted on the RFI [webpage](#).

A summary of feedback received and the IESO's responses is included below. As several stakeholders provided feedback on similar subjects, the IESO has grouped similar feedback into themes. The IESO appreciates the feedback received and has incorporated this into the plan and process for the RFI.

Please note that the information and responses provided by the IESO herein are for information and discussion purposes only and are not binding on the IESO. This document does not constitute, nor should it be construed to constitute, legal advice or a guarantee, representation or warranty on behalf of the IESO.

Summarized feedback and IESO responses:

General Feedback

Out of Context Feedback on the Draft RFI

There were several submissions that provided information or suggestions to the IESO that is more reflective of the information being sought through the RFI submission process. These included requests to address regulatory barriers and take learnings from other jurisdictions, as opposed to comments on the content of the draft RFI document

IESO Response:

This type of feedback was appreciated; however it was of the type the IESO is hoping to receive as part of responses to the final Phase 1 RFI, itself.

Defining Non-Emitting Resources and Eligibility

A number of respondents requested that the IESO clarify its definition of a non-emitting resource. A previous definition that was provided through IESO stakeholder feedback was identified as potentially having unintended consequences for some renewable generation facilities, such as biogas facilities, whose emissions are not subject to regulation per the *Climate Change Mitigation and Low-carbon Economy Act, 2016*. A suggestion was made that the IESO should allow for respondents to describe their resource and why it should be considered non-emitting.

Some further clarification was sought regarding the applicability of storage facilities as non-emitting resources. This particular comment questioned whether the IESO would consider the emissions of the resources being deployed at the time that the storage facility is withdrawing energy.

An additional question was posed inquiring whether non-emitting imports from other jurisdictions or furthermore transmission projects would be considered as eligible resources under this RFI.

Finally a respondent asked whether this RFI was open to non-market participants.

IESO Response:

The term “non-emitting resource” is intentionally not defined in the RFI to provide the broadest and most inclusive meaning possible, encompassing many different fuel types, projects or facilities. If you would like to respond to the RFI, and you believe there may be questions about your resource, please describe in your response why you believe it is “non-emitting”.

The IESO would be interested in receiving information about storage, imports and transmission in response to this RFI. Similarly, although a number of questions in the RFI target services provided market participants, it is not necessary to be a market participant to respond to this RFI.

Participation in the future Phase 2 of the RFI

Some respondents requested that the IESO clarify whether participation in Phase 1 of the Non-Emitting Resources RFI would be considered a pre-requisite to Phase 2 participation. Additional information on the contents and objectives of Phase 2 was also requested.

IESO Response:

Participation in Phase 1 of this RFI is not a prerequisite to participation in Phase 2. Participation in both phases of the RFI will provide the most robust information to the IESO regarding how non-emitting resources can participate in current and future IESO markets. The IESO will be using the information received in Phase 1 to refine Phase 2.

Review of Submissions and Further Analysis

A number of comments asked that the IESO describe what the review and analysis of Phase 1 submissions will entail. Further clarification was sought as to how exactly the information collected during Phase 1 will be used to inform a variety of activities including planning and the Market Renewal Program (MRP) high-level design activities.

IESO Response:

The information received through Phase 1 of the NER RFI will be used to support the MRP—through the Market Renewal Working Group (MRWG) and its Non-Emitting Resource

Subcommittee (NERSC)—and other internal IESO initiatives, aligning with the efforts of other working groups and stakeholdering efforts. The information received in response to the Phase 1 RFI will provide input in to the MRP high level design work later this year. The information received will also be shared directly with the NERSC.

The information gathered through the RFI will be aggregated and provided to these groups, as applicable. Analysis of the data received through the RFI will be conducted by the individual workgroups in coordination with the information gathered through separate stakeholdering activities being conducted. The IESO encourages respondents to engage directly in the MRP stakeholdering activities to understand the processes that feed into the high level design. Similarly, respondents are encouraged to engage in the work carried out by the NERSC to understand the process that is being undertaken to produce the report to the MRWG.

Generally, the use of the data received under the Phase 1 RFI will depend somewhat on the quantity and depth of the submission provided as well as the level of confidentiality requested by respondents.

Questions and Comments

With regards to anticipated questions and comments from respondents on the final RFI, some respondents requested that the IESO clarify how it will implement its question and comment process (i.e., whether there would be set question and comment periods, and anticipated IESO response times).

IESO Response:

Upon posting of the final Phase 1 RFI, the IESO will continue to accept questions and comments. Questions will be responded to as they are received, as practicable.

Any response to a question or comment that may be relevant to all potential respondents will be shared publicly. If a comment or question is posted publicly the IESO will redact any respondent or facility specific information.

Confidentiality and Disclosure of Information

Further clarity was sought with regards to how the IESO plans to treat confidential information. A suggestion was made for the IESO to treat all information received as confidential, and if a respondent requested, that the IESO clarify how it will maintain confidentiality or share information in a non-identifiable manner. Furthermore, the question of how the analysis of information will be used by the IESO and what aggregate data (for example as an input to the NERSC report) will be published.

A respondent also asked the IESO to allow for information within Appendix A to also be marked as confidential, by providing unlocked cells.

IESO Response:

In keeping with the goal of transparency and information sharing with stakeholders, all information received in a RFI response will be treated as public and non-confidential, unless clearly indicated otherwise by a respondent. A respondent should clearly mark any confidential information in its submission as confidential, and include an explanation of why the information is confidential, where practicable. Marking an entire RFI submission as confidential may not guarantee its confidentiality to the extent the IESO must comply with any information requests pursuant to the *Freedom of Information and Protection of Privacy Act*, in which instance the IESO will contact the respondent to specifically review the contents of the submission prior to making any disclosures.

The IESO encourages respondents to structure their submissions in a manner that ensures as much information as possible is reviewed and considered by as many internal and external stakeholders as possible.

A comment field column has been added to Appendix A to allow the respondent to mark which responses should be considered confidential.

Defining the Submission Deadline

A question regarding the submission deadline for the RFI was raised, asking the IESO to establish an exact time for the deadline.

IESO Response:

By end of day on May 4, 2018. If an exact time is more helpful, then 11:59:59 pm, Toronto time.

Other / General Questions

Some respondents requested that the IESO provide additional, more specific system information regarding Ontario's future needs in order for the RFI to result in useful technical submissions.

IESO Response

Please see the IESO's previous response to the questions regarding "System Needs and Connection Information" on page 6 of the [February 15, 2018 Summary of Feedback](#) document.

A question was raised about how market gaps will be addressed and how the financeability of new non-emitting resources will be encouraged.

IESO Response

A number of questions in the RFI drive at the ability of various resources to provide different products and services in the market and the roadblocks or gaps that prevent a resource from participating.

A question was raised about whether information will be collected regarding available resource potential in Phase 1 of the RFI.

IESO Response

The IESO is interested in the potential of a resource in the Ontario market context. The RFI tries to balance requesting information regarding individual existing or planned/potential facilities with general information about a resource type.

If it is not clear where in the RFI a piece of information should be provided, this information can be provided in a supplemental format to the answers to the questions outlined in the RFI.

Requests were made again to remove the two phase approach to ensure the data for phase 2 is included in the MRP high level design and the NERSC report to the MRWG.

IESO Response

Please see the IESO's previous response to the questions regarding "Timelines and Phases" on page 4 and 5 of the [February 15, 2018 Summary of Feedback](#) document.

Feedback on Appendix A

New Fields in Appendix A

Requests were made to add new fields to the Respondent and Technical Information Spreadsheet to capture additional data points.

IESO Response:

A number of existing cells have been modified and new fields have been added. If a data point is not requested in the Respondent and Technical Information Spreadsheet and you believe it is important and relevant to the purpose of the RFI, please provide the information in an additional/separate document or page.

Errors in Appendix A

A number of errors within the Appendix A spreadsheet were identified by respondents, including an inability to populate certain cells and issues with data validation.

IESO Response:

The IESO has reviewed the comments provided and has made edits to the Technical Spreadsheet where applicable. The IESO asks respondents to identify any issues that may still exist and promptly contact the IESO with these issues.

Appendix A – General

Recommendations were made that the IESO differentiate “a project” and “a facility”. This would allow the respondent to provide information about an operating resource and a specific project that might be proposed, such as an upgrade, modification or expansion of an existing facility. In some cases, the project may be the same as the facility (e.g., new projects).

IESO Response:

Appendix A has been created to help facilitate receiving information in an organized fashion, but it is understood that not every field will be applicable to all cases. Modifications were made to Appendix A to ensure, where applicable, each field refers to a project/facility. The intention is that most fields should be able to be responded to whether the respondent is referring to an existing facility or a proposed project.

If you wish to provide information about an existing facility as well as a potential upgrade or expansion to that facility, you may provide additional Respondent and Technical Information Spreadsheets or provide the information in another format as you see fit.

Please provide as much context as possible to the responses to ensure the intention of the response is clear.

Appendix A Section 2

A request was made to modify this section or provide an alternative Section 2 that would allow respondents to submit a portfolio of projects as opposed to a singular facility.

IESO Response:

If you wish to provide information about more than one facility, the respondent may provide more than one Respondent and Technical Information Spreadsheets. If the intention is to respond about the portfolio in aggregate, the respondent may provide additional information outside of Appendix A to clarify the intention of the information provided.

Appendix A Section 3

A number requests were made with regards to the information requested by the IESO in Section 3 of Appendix A, including:

- Add "Estimate time to achieve COD" as a fillable item
- Add "If the project or facility is distribution-connected, has the respondent contacted the LDC to assess connection capability. If yes, are there any notable capacity constraints or limitations."

IESO Response:

The intention is to have Section 3 filled out regarding either the experiences developing existing facilities, or regarding timelines for facilities currently under-development. This information can be provided under the fields provided.

Note there is no limit to the amount of information that can be provided in each cell. In addition, respondents may provide additional information in another format as they see fit.

Appendix A Section 4

A comment mentioned that there is currently no option to indicate if a facility is transmission connected.

IESO Response:

This information can be provided in item 9 of Section 4 of the Respondent and Technical Information Spreadsheet.

Additional Questions on Appendix A

Questions were raised about whether certain fields were mandatory or if fields could be left blank.

IESO Response:

There are no mandatory requirements in this RFI. Respondents are requested to provide as much information as applicable to the facility or technology that is being described in Appendix A.

Feedback on Appendix B

General Feedback

A number of respondents identified that the lack of information on the status of current MRP work streams may inhibit the responses provided in the RFI.

IESO Response:

The intention of the Phase 1 RFI is that information gathered will supplement the stakeholdering efforts being undertaken by the various MRP work streams. The IESO encourages all potential respondents to actively participate in the separate MRP work group activities so you are able to fully understand the status and progress of those groups. The Non-Emitting Resource E RFI is not intended to replace any stakeholdering activities currently or previously undertaken by those groups.

Additional questions re: Appendix B

A question was raised about certain questions in Appendix B appearing to refer only to existing facilities. Clarity was requested as to whether certain questions (specifically 1, 7 and 9) were applicable only to facilities in operation.

IESO Response:

Per Appendix B: “If a particular question appears to target a specific technology or resource type, it does not preclude other parties from answering. Please provide context around answers that will help the IESO more easily understand the responses and the information provided.”

In general, the intention is that most of the questions in Appendix B could be responded to in relation to an existing facility or a potential project, or more broadly, in relation to a technology.

Requests were made to add questions to Appendix B which include asking for the duration of service and lead time of facilities.

IESO Response:

New questions were added to Appendix B. Please see the final Phase 1 RFI.

Modifications to Questions

A number of suggestions were made to modify questions in Appendix B to broaden the scope of the question or to clarify the context in which the question is asked.

IESO Response:

Some changes were made to the questions, and further detail was added to the RFI document to ensure it is clear that if a question does not specifically cover a piece of information a respondent wishes to provide, that they can still provide it as either a response to an Appendix B question or as supplemental information in their submission.

The RFI is structured in a manner that encourages participation by various technologies, projects or facilities at any development or lifecycle stage.

Therefore, some questions are intentionally phrased in a general manner to capture a broad range of responses. There is no limit on the size of response or on providing supplemental information, if more information is needed to better explain your specific context.