

Summary of Stakeholder and Technical Panel Comments on the Impact of the Market Rule Amendment on Consumers Re: Price, Reliability, Quality of Electricity Service

This form summarizes any stakeholder comments and comments received from any *technical panel* discussions on the impact of a *market rule amendment* on the interests of consumers with respect to price and the *reliability* and quality of electricity service.

Terms and acronyms used in this Form that are italicized have the meanings ascribed thereto in Chapter 11 of the *Market Rules*.

Part 1 – Market Rule Information

Identification No.: MR00446-R00-R05

Title: Implementation of the Interim Storage Design

Date of Assessment: November 9, 2020

Part 2 – Summary of Comments

The following indicates the forum at which the comments were made and the applicable *market participant* class, if any, of the person making the comment.

Technical Panel Comments:

The Technical Panel unanimously voted to recommend the market rule amendment proposals to the IESO Board for consideration. In the discussion at the October Technical Panel meeting, members commented on how the proposed rules would pertain to storage resources that would clear the December 2020 capacity auction and asked about the timeline for a more permanent set of rules could be expected for storage resources. IESO staff indicated that the changes to fully integrate storage resources into the market rules would occur after the implementation of the Market Renewal Program. Technical Panel members submitted suggestions on improvements to rule language, several of which were incorporated into the recommended version.

At the September Technical Panel meeting, the Demand Response representative observed that by including energy storage resources as part of market rules related to reliability, other resource types were excluded. The IESO amended the proposal based on the

feedback to ensure all resource types were included. Additionally, the residential consumer representative asked a question about whether the storage community might benefit from preferential treatment during periods of surplus generation. The IESO confirmed that the current proposal is focused on market participant storage facilities which are exposed to market prices for electricity, upon which they can make economic choices to discharge or recharge their operations.

Technical Panel members also provided general comments at meetings where IESO staff presented education items on the progress of the interim storage design.

Stakeholder Comments:

No comments from the broader stakeholder community were received as part of the Technical Panel's request for stakeholder comment.

Stakeholders did provide feedback in discussions of the Energy Storage Advisory Group from March-July 2020. These comments along with IESO responses are available on the ESAG webpage.