

Demand Response Working Group

November 2018: Response to Stakeholder Feedback

Following the November 15, 2018 Demand Response Working Group (DRWG) stakeholder meeting, the IESO invited stakeholders to provide comments and feedback to help advance efforts of the group. The IESO received feedback from:

Centrica Business Solutions
City of Toronto
Enel X
NRG
Rodan

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

Note on Feedback Summary

The IESO appreciates the feedback received from stakeholders. This stakeholder feedback, along with the comments provided at the stakeholder engagement sessions, is important to the collaborative approach the IESO has committed to. All feedback received has been noted and will be considered as the work of the DRWG moves forward. Below, the IESO has provided a summary table which outlines responses in respect of specific feedback or questions for which an IESO response was required at this time.

Stakeholder comments and IESO responses

Design Element / Issue	Stakeholder	Feedback	IESO Response
Metering: Additional Means of Collecting Data	Centrica Business Solutions	Data collection via a data logger using KYZ pulses has proven reliable and useful for some customer sites in other jurisdictions, such as PJM. Centrica Business Solutions would be happy to review our current and future data collection process in more detail with the IESO if that would be valuable.	IESO discussed the technical requirements for KYZ pulses at the Feb 12 DRWG meeting. Presentation material can be found here .

Design Element / Issue	Stakeholder	Feedback	IESO Response
Accounting for Loads Participating in the ICI and as DR Resources in the ICA	Centrica Business Solutions	The fourth option available to the IESO to manage reliability risk – to apply a ‘lever’ once the ICA is in market and its simultaneous effect with the ICI can be observed, appears prudent. To the principle of enabling customer flexibility within reasonable bounds, we could not support the ‘blanket ban’ inferred by option five.	The IESO understands Centrica’s preferences and will give it due consideration in the ICA detailed design.
General Comments / Feedback	Centrica Business Solutions	A general comment on meeting recording - when a decision is taken or deferred in a DRWG meeting, it would be helpful to provide a clear record of such. For example, the minutes of the September 11 meeting include an “Action Item Summary” box – perhaps a “Decision Taken” box could be added. To provide a tangible example - utilization payments have been discussed multiple times in 2018, with implementation tabled for now. For stakeholders who cannot necessarily attend each DRWG meeting, finding out what was decided (or tabled) via the printed materials is quite difficult.	A list of “Action Items” was added to the Nov 15 DRWG meeting minutes and will be included moving forward.
Operations: DR Activation Times	City of Toronto	The IESO approved DR market rule amendments will reduce activation notice, and increase activations; this may increase the challenge of managing the in-day adjustment for specific participants.	Recent Market Rule amendments only impact the DR stand-by notification and duration of DR activation. There are no market rule changes currently being considered to reduce the activation notice.
Operations: DR Activation Times	City of Toronto	The IESO has noted that there will be additional costs to the IESO to implement the Approach 2 update of the DR Activation Timeline since it impacts multiple components. Can the IESO provide details on the scale of these costs and/or the feasibility of investing in updates to meet the	IESO recommends Approach 1 mainly because of its alignment with the direction the ICA is seeking to take the DR product and allowing IESO to make activation decisions based on market conditions closer to real-time. As

Design Element / Issue	Stakeholder	Feedback	IESO Response
		system needs?	described in the slide-deck presented at the DRWG, the estimated cost to implement Approach 1 (recommended approach) is negligible.
Operations: DR Activation Times	City of Toronto	The City proposes that the IESO update the DR Activation Timeline to align with the 4 hours pre-activation In Day Adjustment Period and provide participants with a minimum 4 hour notification.	<p>With respect to your recommendation to increase the activation notice timeline, the primary objective of the changes proposed for DR activation timeline during the November DRWG was to introduce certainty with the DR activation timeline. Any changes to the activation notice timeline will require further analysis and stakeholder consultation.</p> <p>That being said, the IESO believes that increasing the activation timeline window will create misalignment with the direction the ICA is seeking to take the DR product and reduce IESO's ability to make activation decisions based on market conditions closer to real-time.</p>
Proposed Changes to the Contributor Management Process	City of Toronto	IESO has said that DRMPs must contact the IESO when interdependencies in contributor registration are identified. The City notes that this challenge has created contract issues that may have resulted in revenue losses. The City recommends that the IESO collaborate with the DRWG to identify a clear process.	Contributor interdependencies are being managed by the IESO through in-house processes. If City of Toronto believes that this issue has resulted in revenue losses, please contact the IESO to discuss.
Metering: Additional Means of	City of Toronto	IESO has said that there are currently no provisions in the Market Manual to allow for collecting meter data via KYZ pulses. The City of	IESO discussed the technical requirements for KYZ pulses at the Feb 12, 2019 DRWG meeting. Presentation

Design Element / Issue	Stakeholder	Feedback	IESO Response
Collecting Data		Toronto supports the change to allow the collection of KYZ pules as some newly installed LDC meters do not allow customers access to the telemetry.	material can be found here .
DR Work Plan 2019	City of Toronto	IESO has proposed that the DRWG can be utilized as a forum for more focused discussions on the impact of particular ICA design decisions to provide clarity and understanding for both the IESO and DR participants. Can the IESO clarify how details discussed at the DRWG will be used to define DR for the ICA?	The IESO is bringing various ICA elements to the DRWG for discussion as some of these decisions could impact DR participation. However, all ICA decisions and feedback will be part of the ICA Stakeholder Engagement forum. More information can be found on the webpage .
DR in the ICA: Forward Period Obligation	City of Toronto	IESO has said that requirements during the Forward Period may need to change due to the longer forward period in the ICA. The City recommends that the IESO create 2 streams: A) Participants that require contributor identification should meet six months in advance of notification. B) Participants that have a construction requirement should provide confirmation 1 month prior to the final rebalancing auction.	As per the HLD, the IESO is contemplating a streamlined set of project milestones for projects below a certain size threshold and for certain resource types. For instance, project milestones for DR resources may be tied to acquiring a certain percentage of contributors at various stages during the forward period. The IESO will consider stakeholder's feedback as these streamlined milestones are established during detailed design.
DR in the ICA: Resource Eligibility - MCHD	City of Toronto	IESO has said that the ICA will have a MCHD requirement and DR must conform with the MCHD (which could be greater or less than the current four hour obligation in the DR auction). Is the IESO proposing that the ICA will have a unique DR MCHD?	At the present time, the IESO is not proposing a unique Minimum Continuous Hours of Deliverability (MCHD) for DR. The IESO is currently considering an MCHD as a minimum eligibility requirement that must be satisfied by all ICA resources.

Design Element / Issue	Stakeholder	Feedback	IESO Response
DR in the ICA: Resource Eligibility - MCHD	City of Toronto	If the IESO is standardizing MCHD for all resource types the City recommends that the MCHD reflect DR delivery capabilities.	At the present time, the IESO is planning to determine the MCHD based on the minimum reliability requirements as observed from analysis. The IESO understands that the MCHD will have ramifications for various resource types, and will therefore give this comment consideration in its detailed design.
DR in the ICA: Qualified Capacity	City of Toronto	IESO has asked "when is the right time for historical performance to begin counting towards future Capacity Qualifications in the ICA?" Can the IESO provide clarity on what metrics would be included in performance?	The ICA's Capacity Qualification methodology could use some, or all of, a DR resource's (a) bid data, (b) historical activations and (c) capacity check test results as performance metrics to determine a DR resource's future Qualified Capacity. The IESO will review and develop these metrics, and if need be, add other performance metrics during the detailed design stage.
DR in the ICA: Qualified Capacity	City of Toronto	The IESO has already introduced significant availability charges and non- performance charges placing the onus on the participant to ensure that the capacity is delivered. The IESO proposal to integrate a new deliverability assessment to reflect the historical availability will further reduce the available DR capacity potentially raising costs for rate payers.	The deliverability assessment will assess the impact of transmission constraints that may reduce the deliverability of a resource. This assessment is critical to ensure that capacity secured via the ICA can actually help meet resource adequacy needs Demand reduction resources impact the flow of electricity through the system in a similar way as supply resources and therefore may be subject to deliverability constraints.
DR in the ICA: Qualified Capacity	City of Toronto	The City recommends that the IESO acknowledge the significant changes and new operational requirements in participating in the	The IESO anticipates that the way in which DR resources participate in the IESO Administered Markets will continue

Design Element / Issue	Stakeholder	Feedback	IESO Response
		updated Demand Response program, and allow for adequate time for participants to adjust to the market rule changes before considering the historical performance.	to evolve going forward. To help DR participants manage these changes, the IESO will continue to engage stakeholders through various forums. The TCA will begin the process of evolving the DR product in a measured manner so that DR resources can effectively participate, and provide the required product, in the ICA.
DR in the ICA: Qualified Capacity	City of Toronto	The City recommends that any qualified capacity decisions should reflect hours of availability. For example a peak summer resource should receive a reduced Q-Cap that allows the site to place energy bids for their hours of availability without penalty.	The IESO is still determining the Capacity Qualification process for DR in the ICA, as well as the associated performance obligations and non-performance implications.
DR in the ICA: Capacity Payments	City of Toronto	IESO has said that failing to reduce load within a threshold will result in dispatch non-performance charges being applied. It is expected to be similar in nature to existing DR Auction Dispatch Charge (CT 1317). Does the IESO intend to have an equal non-performance penalty for all types of generation participating in the ICA?	The Dispatch Non-Performance Charge that currently exists for virtual HDR resources under the DR Auction was created to reflect some of the unique characteristics of that resource type (e.g., to reflect that these resource do not have real-time telemetry and are not Market Participants and as such are not subject to the same compliance obligations as other resources). For the purposes of the ICA, the IESO intends to review the appropriate mechanism(s) to ensure that virtual HDR resources have the correct real-time incentives to perform as required to provide the capacity product being secured.

Design Element / Issue	Stakeholder	Feedback	IESO Response
DR in the ICA: Capacity Payments	City of Toronto	Regarding dispatch non-performance charges, demand response should be provided with an equal opportunity and not burdened with unique penalties that would create a competitive advantage for other resource types.	This will be considered in the ICA design.
Accounting for Loads Participating in the ICI and as DR Resources in the ICA	City of Toronto	The IESO on the November 17th 2017 DRWG meeting had assigned a \$100 price bid threshold to ensure that DR resources will not be double counted. Can the IESO confirm this?	No, the \$100 bid price threshold was not introduced to eliminate the potential double counting of capacity. The bid price threshold was introduced to reduce payments to a DRA resource for their unavailability on days where they already planned to reduce their consumption for the ICI program. The price threshold's effectiveness is as true-up of payments to reduce financial "double-dipping". The bid price threshold does not change the amount of capacity procured, and does not increase the likelihood of DR capacity being available to reduce its consumption when called upon to do so.
Accounting for Loads Participating in the ICI and as DR Resources in the ICA	City of Toronto	As a comment, demand response is a unique resource that provides a full value stack of system benefits including that it can be contracted, dispatchable, has daily availability, can supply during a winter peak, and can support control actions on the EOSCA list. ICI does not do any of these.	The IESO accepts this characterization of DR. The "lever" option to make DR participation contingent on not participating in the ICI is not based on an IESO preference for the ICI program over the ICA, but simply a recognition that the ICI is not an IESO program (it is established by Ontario regulations) and it may be a disincentive to participating in the ICA.
Accounting for Loads	City of Toronto	Can the IESO confirm that the ICI program is expected to continue through 2023 and once the	ICI is a government program and therefore not at the purview of the IESO.

Design Element / Issue	Stakeholder	Feedback	IESO Response
Participating in the ICI and as DR Resources in the ICA		ICA is implemented?	Should the government make any adjustments to the program the IESO would adjust our assumptions accordingly. For more information on the consultation process see: https://www.ontario.ca/page/consultation-industrial-electricity-prices
Accounting for Loads Participating in the ICI and as DR Resources in the ICA	City of Toronto	Is the IESO proposing to adjust load forecasts and the amount of capacity required to meet daily system reliability requirements?	The IESO currently adjusts its demand forecast to include the anticipated effects of the ICI program. This process will be reviewed in the ICA's detailed design.
Accounting for Loads Participating in the ICI and as DR Resources in the ICA	City of Toronto	Does the IESO plan on engaging stakeholders on proposed changes to the contracted capacity and/or changes in system reliability?	Yes.
Accounting for Loads Participating in the ICI and as DR Resources in the ICA	City of Toronto	The City recommends that the IESO provide details of the changes for accounting for loads participating in the ICI and as DR resources in the ICA and clarify how the Industrial Conservation Initiative is meeting Ontario's electrical grid reliability needs.	The IESO intends to provide the required level of transparency into how supply and demand forecasts are established to help inform stakeholders regarding how Target Capacity is established.
DR Test Activations	Enel X	Enel X would like changes such as dispatching resources from 1 to 4 hours and having resources on standby more frequently to occur in advance of the May 1st 2019 commitment period.	IESO notes the concerns expressed regarding the HDR testing. IESO plans to provide an update on HDR testing in the February 12 meeting.
DR Registration Update	Enel X	Enel X supports the proposed changes for the Record of Installation and the Single Line Diagram as outlined at the WG.	IESO discussed the DR Audit process including use of LDC statement at the Feb 12 DRWG meeting. Presentation

Design Element / Issue	Stakeholder	Feedback	IESO Response
		<p>Enel X does not support the changes to Record Retention. As discussed at the DRWG meeting, it will be a business process change for Aggregators to collect and retain monthly LDC statements. One which will be a massive undertaking since Aggregators may have hundreds of customers. Currently, statements are only required during the audit process. Since IESO staff have advised that the audit process will be reviewed at a future DRWG, Enel X recommends that this change not be implemented until the review is completed with Market Participants and the new audit process has been completed.</p> <p>Enel X recommends that the IESO defines the data accuracy comments and then let the market figure out the solution.</p>	<p>materials can be found here.</p>
DR Registration Update	Enel X	<p>Enel X looks forward to further discussion on the use of KYZ pulse data including guidelines on how and when KYZ pulse data will be acceptable. For example, there are some instances where data has now become unavailable because the customer's utility moved their meter onto a private server and is refusing to provide interval data. These customers are being denied access to the markets because of the current lack of guidelines from the IESO on what is admissible for KYZ pulse measurement data.</p>	<p>IESO discussed the technical requirements for KYZ pulses at the Feb 12 DRWG meeting. Presentation material can be found here.</p>
DR Work Plan 2019	Enel X	<p>Enel X supports the following elements for the 2019 Work Plan:</p>	<p>Thank you for providing your support on the 2019 work plan.</p>

Design Element / Issue	Stakeholder	Feedback	IESO Response
		<ul style="list-style-type: none"> - Review of DR Testing Regime - Audit Process Review – including measurement data submission process - DRA Transition to the ICA - Participation of Load in the Day Ahead Market - Unforeseen impacts due to the Operational Changes in 2019 	
DR Work Plan 2019	Enel X	Enel X would welcome a discussion on the potential to allow multiple aggregations in a given zone. This change could ensure better efficiencies at the aggregation level for the portfolios.	Modifications to the existing aggregation rules are not currently being considered as part of the ICA project. Any future changes to aggregation requirements in the Market Rules, including any changes resulting from the work of the TCA project, would also be applicable to the ICA going forward.
Metering: Additional Means of Collecting Data	NRGCS	KYZ pulses would allow DRMPs another option for meter data access while staying within the required $\pm 1\%$ threshold.	IESO discussed the technical requirements for KYZ pulses at the Feb 12 DRWG meeting. Presentation material can be found here .
DR in the ICA: Performance Assessment	NRGCS	The DR class average, based on actual test and activation data, will lag at least 4 years. While it might be easy to administer, it certainly would not reflect true capacity of new DR resources. Additionally, it would make it very difficult from a planning perspective to capture the effect of demand response on the peak load forecast.	One of the options for assessing DR's Qualified Capacity is to create a class average performance factor based on existing DR, which could be used to evaluate expected performance of New DR. For this option, the IESO understands stakeholder's perspective that the class average used to assess new DR's Qualified Capacity may not be indicative of its performance in the commitment period. This may be due to the fact that Capacity Qualification of the base auction occurs four years in advance

Design Element / Issue	Stakeholder	Feedback	IESO Response
			<p>of commitment period and also because there can be a lack of data that demonstrates the DR resource's performance over the peak load period. These considerations for this option, along with other options, will be reviewed as part of detailed design.</p>
DR in the ICA: Performance Assessment	NRGCS	<p>NRGCS is concerned that the proposal to develop performance and availability penalties for DR could create an unlevel playing field for different types of resources since traditional generators are not currently assessed non-performance penalties. Resources that provide load curtailment would be especially harmed by this proposal since the diurnal pattern of baseload could vary significantly. In addition this proposal has the potential to increase customer costs associated with procurement of capacity to meet the system's peak load.</p>	<p>The Dispatch Non-Performance Charge that currently exists for virtual HDR resources under the DR Auction was created to reflect some of the unique characteristics of that resource type (e.g., to reflect that these resource do not have real-time telemetry and are not Market Participants and as such are not subject to the same compliance obligations as other resources). For the purposes of the ICA, the IESO intends to review the appropriate mechanism(s) to ensure that virtual HDR resources have the correct real-time incentives to perform as required to provide the capacity product being secured.</p>
DR in the ICA: Performance Assessment	NRGCS	<p>Concerns about how resources would perform during reliability events because of their limited duration nature could be properly reflected in penalties for non-performance rather than via restriction on qualified capacity based on a unified MCHD number.</p>	<p>As stated above, MCHD will be a minimum threshold for eligibility. It will not be a measure of the relative value of one type of capacity over another. Non-performance charges, assessed through Resource Performance Assessment process, in the ICA are intended to ensure capacity resources make their ICA-obligated capacity</p>

Design Element / Issue	Stakeholder	Feedback	IESO Response
			<p>available in the energy market. The Capacity Qualification process establishes the amount of capacity each individual resource can, on average, contribute towards meeting resource adequacy needs for the relevant obligation period. This process helps to ensure resource adequacy needs are met. As such, both the Capacity Qualification and Resource Performance assessment process are essential to procuring a reliability product.</p>
<p>Accounting for Loads Participating in the ICI and as DR Resources in the ICA</p>	<p>NRGCS</p>	<p>It was NRGCS' understanding that ICI and DRA were already mutually exclusive and that double dipping of MWs was not permitted. The reductions that come from ICI and DRA are separate since customers' running load is already reflective of what they have been reducing for the ICI program. For example, a 60 MW running load customer is signed up to reduce 10 MWs in the DRA based on their estimated baseline of 40 MWs, which accounts for peak shaving days that the customer participated in. As the market rules stand today, if a customer participates in ICI, it would be unlikely they could participate in DRA, since they would have no baseline.</p>	<p>The IESO is exploring the interaction of ICI and DRA participation to ensure that MWs are not double counted in reliability planning.</p> <p>The ICI and DRA programs are not currently mutually exclusive.</p> <p>There are currently non-performance charges for DRA participants that act to discourage non-performance, but these do not assure that MWs are mutually exclusive for reliability planning purposes.</p> <p>Baseline calculations are an estimate of what a resource's consumption profile would have been had a DR activation not taken place. Baselines are used for settlement purposes and do not assure</p>

Design Element / Issue	Stakeholder	Feedback	IESO Response
			mutually exclusive MWs in reliability planning.
Accounting for Loads Participating in the ICI and as DR Resources in the ICA	NRGCS	NRGCS is interested in developing rules that will allow participation in both Operating Reserves and DRA, similar to how PJM allows a customer to participate in both Economic DR and EDRP. Right now there are a lot of MWs that cannot participate in DRA because they chose to participate in Operating Reserves.	Expanding Participation in OR will be considered further by the Market Development Advisory Group (MDAG).
Operations: DR Activation Times	Rodan Energy Solutions	Rodan will reluctantly accept the proposed change in notification timeline, but with the proviso that the revised language clearly stipulates that 2.5 hours is the target and not 2 hours. Based on past experience with transitional DR3/CBDR/DRA rule changes, the spirit and intent of the rules aren't always adequately captured for future interpretation. The new wording must be such that the original intent of the rule endures and preserves the consensus understanding.	To clarify, IESO will add the following to the Market Manual 4, Part 4.3, Section 7.2.1: "If required to provide demand response, the IESO will issue dispatch instructions to HDR resources in the form of an activation notice at least 2 hours and 30 minutes in advance but not later than 2 hours ahead of each dispatch hour." And a footnote for further clarity as follows: "IESO will target to issue DR activation notification at least 2.5 hours before the dispatch hour."
Metering: DR Registration Updates	Rodan Energy Solutions	Rodan does not support the mandatory gathering of LDC statements every month. The logistics of collecting statements for multiple accounts is an unreasonable burden and will further erode the minimum capacity level at which aggregation makes commercial sense. We are happy to share statistics with the IESO on a	The IESO discussed the DR Audit process including use of LDC statement at the Feb 12 DRWG meeting. Presentation materials can be found here .

Design Element / Issue	Stakeholder	Feedback	IESO Response
		confidential basis if desired, but the IESO can easily estimate the number of monthly statements involved by reviewing the total number of registered contributor sites.	
Metering: DR Registration Updates	Rodan Energy Solutions	Rodan does support the acceptance of an LDC statement in lieu of an ROI, whereby either document can be used to enroll a contributor. Rodan suggests that the IESO might also consider allowing the participant to furnish data from alternate sources (LDC-supplied data or third party) to provide reconciliation for any period where a contributor statement is not available.	IESO's position is that the submission of the LDC Statement allows the IESO to fulfill contributor registration requirements as has been discussed at the Nov 15th DRWG meeting . Therefore, IESO will be requesting an LDC statement when the DRMP registers a new contributor.
Metering: DR Registration Updates	Rodan Energy Solutions	With respect to audits, Rodan requests that the IESO clarify the maximum number of years back audits can be expected. As per page 3 of the minutes of the September 11, 2018 meeting, the IESO commented that that they did not anticipate that the audit period for contributors would extend beyond 2 years. However, the discussion at the most recent session seemed to indicate that the IESO would not limit themselves to 2 years and might consider auditing over the full 7-year document retention period.	IESO reserves the right to audit the DRMPs going back seven years.
Metering: Additional Means of Collecting Data	Rodan Energy Solutions	Rodan believes KYZ data should be accepted by the IESO since Measurement Canada already recognizes the use of such devices as an approved method of procuring consumption data for settlement. In this respect, it is no different than any other measurement technology and subject to the same standards	IESO is not disallowing meter data collected through the KYZ pulses. IESO discussed the technical requirements for KYZ pulses at the Feb 12 DRWG meeting. Presentation material can be found here .

Design Element / Issue	Stakeholder	Feedback	IESO Response
		and limitations.	
Metering: Additional Means of Collecting Data	Rodan Energy Solutions	We await clarification from the IESO on their specific concerns as to why they are considering that KYZ data should be disallowed. To facilitate productive discussion, Rodan expects that the IESO's concerns will be clearly articulated at or before the next DRWG. If this discussion requires the context of the audit results, then we would expect to have that conversation at the same time.	IESO discussed the technical requirements for KYZ pulses at the Feb 12 DRWG meeting. Presentation material can be found here .
Metering: Additional Means of Collecting Data	Rodan Energy Solutions	<p>Rodan requests that the IESO provide a definitive statement on the suitability of Green Button data as measurement data for settlement purposes – both in the DRA and ICA. Green Button promises to provide an additional avenue of data collection as LDCs (hopefully) adopt the initiative.</p> <p>We urge the IESO to consider reinstating the ability of participants to submit revised measurement data (as was permitted in DR3/CBDR) to allow participants to proactively correct any errors that might be detected after the initial submission window.</p>	IESO had a broader discussion regarding the DR Audit process at the Feb 12 DRWG meeting. Presentation materials can be found here .
DR in the ICA: Qualified Capacity	Rodan Energy Solutions	Rodan believes that the influence of ICI participation on the qualification process must be thoroughly explored.	The influence of ICI will be further reviewed as part of ICA's detailed design. The IESO will continue its engagement with the stakeholders through the ICA and the DRWG forums to discuss relevant topics such as the one raised by the Market Participant.

Design Element / Issue	Stakeholder	Feedback	IESO Response
Accounting for Loads Participating in the ICI and as DR Resources in the ICA	Rodan Energy Solutions	<p>As an adjunct to comments made in the MR feedback stream, Rodan believes that several principles must be kept in mind when discussing ICI and DR in the ICA:</p> <ul style="list-style-type: none"> • The ICI and DR in the ICA must continue to coexist • Participation in ICI should not devalue the qualification or availability of DR capacity • DR participation and qualification in the ICA should be as independent of ICI constraints as possible to limit the impacts from ICI changes by government. Binding DR too tightly to ICI could lead to volatility and uncertainty by making the qualification process for DR overly sensitive to out-of-market influences. 	<p>There is a potential for consumers to be counted as both a reduction to peak demand in the demand forecast (as a result of ICI), and as resources available to satisfy peak demand (through DR). The IESO will need to explore the issue further to ensure that the interaction of DR resources in both the ICA and ICI does not lead to an unacceptable reliability risk, and does not inappropriately distort market signal for the value of capacity. The IESO will consult DRWG before recommending the preferred approach during ICA's detailed design.</p>

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. In the event that there is any conflict or inconsistency between this document and the Market Rules, Market Manuals or any IESO contract, including any amendments thereto, the terms in the Market Rules, Market Manuals or contract, as applicable, govern.