

# Demand Response Working Group – *Feedback Form*

Meeting Date: November 15, 2018

<b>Date Submitted:</b> <i>2018/12/07</i>	<b><u>Feedback provided by (optional):</u></b> Company Name: Rodan Energy Solutions Contact Name: _____ Phone: _____ Email: _____
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Following the November 15 meeting of the Demand Response Working Group (DRWG), the Independent Electricity System Operator (IESO) is seeking feedback from participants on questions posed during the presentation.

The presentation can be accessed from the DRWG engagement [webpage](#).

Please provide feedback by **December 7, 2018** to [engagement@ieso.ca](mailto:engagement@ieso.ca). To promote transparency, this feedback will be posted on the DRWG engagement webpage unless otherwise requested by the sender. Any feedback on specific ICA design considerations should be made directly through the ICA engagement, rather than through this feedback mechanism.

Section	Question/Topic	Stakeholder Feedback
<b>Operations: DR Activation Times</b>	Recommendation: update to DR activation timeline - Approach #1 (Activation notice will be issued approximately 2 hours and 30 minutes but at least 2 hours before the start of the first dispatch hour)	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.

<p><b>Metering: DR Registration Updates</b></p>	<p>Proposed Changes to Contributor Management Process:</p> <ul style="list-style-type: none"> <li>- Record of Installation</li> <li>- LDC statement submissions</li> <li>- Single Line Diagrams</li> <li>- Identification of Records</li> <li>- Record Retention Period Requirement</li> </ul>	<p>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 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.</p> <p>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.</p> <p>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.</p>
<p><b>Metering: Additional Means of Collecting Data</b></p>	<p>Reasons why data collection via KYZ pulses should be allowed.</p>	<p>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 and limitations.</p> <p>From this viewpoint, we await clarification from the IESO on their specific concerns as to why they are considering that KYZ data should be <i>disallowed</i>. To facilitate productive discussion, Rodan expects that the IESO's concerns</p>

		<p>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.</p> <p>As a related item, Rodan requests that the IESO provide a definitive statement on the suitability of Green Button data for 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>
<b>2019 DR Workplan</b>	<p>What is required, and what would be most efficient, to transition from the DR Auction to the Incremental Capacity Auction?</p> <p>What does the DR Community need?</p>	
<b>2019 DR Workplan: Website changes</b>	<p>What changes to the DR webpage(s) would help demonstrate the value of DR and support communication about this resource to the broader sector?</p>	
<b>DR in the ICA</b>	<p>Of the items presented regarding ICA design features that may be most impactful for DR resources, which ones do you believe should be a top priority for discussion when establishing the 2019 DRWG work plan</p>	<p>Rodan believes that the influence of ICI participation on the qualification process must be thoroughly explored. We thank the IESO for introducing the topic during this session.</p>

	<ul style="list-style-type: none"> <li>•Resource Eligibility</li> <li>•Qualified Capacity</li> <li>•Forward Period Obligation</li> <li>•Performance Assessment</li> <li>•Capacity Payments</li> </ul>	
<p><b>Accounting for Loads Participating in the ICI and as DR Resources in the ICA</b></p>	<p>Comments on potential approaches and suggestion for other approaches to address the reliability risk.</p>	<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"> <li>• The ICI and DR in the ICA must continue to coexist</li> <li>• Participation in ICI should not devalue the qualification or availability of DR capacity</li> <li>• 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.</li> </ul>
<p><b>Future Meetings</b></p>	<p>Proposed first 2019 meeting date (Feb 12) and meeting frequency (8-10 week cycles).</p>	

**General Comments/Feedback:**