

# Demand Response Working Group – *Feedback Form*

Meeting Date: September 4, 2019

<b>Date Submitted:</b> <i>2019/09/12</i>	<b>Feedback provided by (optional):</b> Company Name: _____ AEMA _____ Contact Name: Katherine Hamilton Phone: (202) 524-8832 Email: katherine@38northsolutions
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Following the September 4, 2019 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 submit feedback 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.

## **Agenda Item: Cost Recovery for Out-of-Market Activation Payments**

Stakeholders are asked to review and provide feedback on the proposed market rule amendments and market manual concepts, to enable out-of-market activation payments, by **September 11, 2019**.

Please provide comments relating to the section of the draft amendment and concept proposal in the corresponding box below. Please include any views on whether the draft language clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language below and red-lining the suggested changes.

MR Chapter	Design Element (MR section)	Stakeholder Comments on Amendments
7	System Operations and Physical Markets	AEMA is supportive of comparable treatment for resources during testing and supports the market rule change.
9	Settlements and Billing	

MM	Design Element (MM section)	Stakeholder Comments on Concepts
5.5	Physical Markets Settlement Statements	
7.3	Outage Management	
12	Capacity Auctions	
	IESO Charge Types and Equations	
	Format Specifications for Settlement Statement Files and Data Files	

Stakeholder comment is requested on the following IESO directed questions that will be forwarded to Technical Panel for their consideration in the recommendation of market rules to the IESO Board of Directors:

Question	Stakeholder Comment
Do you believe there is a clear and common understanding of the intent and purpose of the draft market rule amendment?	There is an understanding that comparable treatment between resources is achieved by compensating HDR resources when they are activated out of market – capacity based test activations and Emergency Operating State Control activations – similar to traditional supply resources under the current Market Rules.
In your view, is this market rule amendment in the interest of consumers with respect to prices?	
In your view, is this market rule amendment in the interest of consumers with respect to the reliability of electricity service?	
In your view, is this market rule amendment in the interest of consumers with respect to the quality of electricity service?	
In your view, are there any adverse effects (not identified in a previous answer) that may be caused by implementing these proposed changes, either to consumers or market participants?	The current Market Manuals will treat the payment differently for tests and for EOSC activations, however both activations will be out of market and therefore the costs will be similar theoretically. HDR resources have recommended that similar to other markets, if resources are only going to be paid \$250 for their tests, instead of their bid price, then HDR resources should be able to schedule their own tests within agreed upon parameters, similar to other jurisdictions. AEMA recommends that IESO review PJM Manual 18 (section 8.7) that outlines ELRP’s current DR testing standards. Further rationale for this

	point is included in comments submitted during the Stakeholder Engagement on this topic at the DRWG.
General Comments:	

**Other Agenda Items:**

Feedback on all other agenda items is requested in the form below.

Agenda Item	Question/Topic	Stakeholder Feedback
<b>Estimates of Demand Response Potential in Ontario</b>	<p><b>Please provide feedback by September 11, 2019</b></p> <p>DRWG members interested in participating in a one-on-one meeting with the IESO to discuss demand response potential are asked to identify their interest.</p>	<p>AEMA members will reach out individually to express interest in meeting one-on-one with the IESO to discuss Demand Response potential.</p>
<b>HDR Resource Testing - Proposal</b>	<p><b>Please provide feedback by September 18, 2019</b></p> <p>Seeking stakeholder feedback on the proposal</p>	<p>AEMA will respond to this proposal later</p>
<b>M&amp;V/ Data Submission - Proposal</b>	<p><b>Please provide feedback by September 18, 2019</b></p> <p>Seeking stakeholder feedback on the proposal</p>	<p>AEMA will respond to this proposal later</p>

**Other Comments/Feedback:**

AEMA is a North American trade association whose members include distributed energy resources, demand response (“DR”), and advanced energy management service and technology providers, as well as some of Ontario’s largest consumer resources, who support advanced energy management solutions due to the electricity cost savings those solutions provide to their businesses.