

IESO Engagement

Feedback on Request for Information for Non-Emitting Resources

January 17, 2018

Energy Storage Canada (ESC) is pleased to provide comments to the IESO on the proposed Request for Information (RFI) for Non-Emitting Resources. ESC supports the IESO's goal to learn more about the potential for non-emitting resources against the backdrop of market renewal. At the same time, we believe that in order for the RFI to generate the most valuable and relevant information, the context (objectives, system needs, timing) should be modified and the types of information requested should be more established in real-world criteria. With additional rigour, structure and context, the input to the RFI will provide a more accurate picture and better serve the IESO's ultimate objectives.

RFI Objectives

We recommend that the IESO provide greater clarity regarding what system needs are being considered when asking proponents about what services and/or products they can offer (i.e., Capacity, Energy, Regulation Service, Flexibility/Ramping/Operation Reserve, Other). In addition, the IESO should be quantifying these needs in order to set the appropriate context for respondents. Needs in these various areas have been articulated in different IESO consultations or documents and should be clarified here.

We also recommend that the IESO clarify and include all the initiatives that the results of the RFI have the potential to inform and influence. While Market Renewal is critical, we also maintain that the outcome of other ongoing processes, such as LTEP Implementation and System Planning, can benefit from the information gleaned in the RFI and provide greater consistency in the IESO's approach to a broader set of initiatives.

Commercial Information and Storage Capabilities

Given that storage has the potential to offer more than one service, the RFI should also explicitly ask and look at the extent to which services can be offered concurrently from the same facility. In addition, a request for commercial information should separate energy cost and capacity cost to capture the cost of services that storage facilities could potentially provide.

RFI Timing/Phasing

The RFI should be complete and the results provided to the Non-Emitting Resource Sub-Committee (NERSC) as an input to formulating its recommendations to the Market Renewal Working Group (MRWG) in the fall of 2018. Otherwise, the NERSC is faced with a significant information gap in the baseline information from which it can make credible recommendations to the Working Group.



There also needs to be reasonable lead time for the NERSC to review the RFI findings to adequately consider the information in order to make appropriate recommendations. For this reason, we believe the timelines should be shortened and the RFI can be completed in one phase.

Conceptual Projects Vs Real Projects

The RFI should consider not just the operational characteristic of the technologies but also provide the IESO with a sense of how real (i.e., buildable) the projects actually are, including:

Land/property Control

- What does the developer have in terms of rights (e.g., property access or ownership) to build the project?
- What permits will be required (e.g., OP amendments, rezoning, variances, EA and other permits). How will permit requirements be addressed over what expected time frame.

The Proponent

- What is the respondent's capacity to deliver the technology (experience, financial resources)?

Community and Stakeholder Engagement and Plans

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- What level of public support does the project have? Council resolutions? Letters from approval authorities? Indication from the community at large (local residents, landowners, local businesses) of their perspectives on the project? Other?
- Past or existing community/stakeholder engagement plans (including plans for engaging with First Nations and Métis communities)?
- Identification of any future community/stakeholder engagement plans (including plans for engaging with First Nations and Métis communities)?
- Identification of any declarations/agreements with communities/stakeholders (including declarations/engagements with First Nations and Métis communities)
- Identification of any past, existing, or future environmental assessment plans, approvals, permits, etc.?

Transmission Interconnection

- Does the project have access to transmission connection and is there capacity available?
- What studies or other work have been completed to confirm connection feasibility?

Other Socioeconomic Benefits

- Related employment in manufacturing, construction, operations? Sustainable?
- Other spin off development/employment?



Environmental Benefits (This RFI is about non-emitting resources, after all)

- Carbon reduction potential?
- Brownfield recovery

Confidentiality & Proprietary Information

ESC requests that the IESO clarify and state in the RFI that the information collected is confidential and any output from the IESO will respect the proprietary nature of the data and information supplied by respondents.

We appreciate the opportunity to comment and look forward to ongoing work with the IESO on this important initiative.

Yours truly,

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