

Comments to:  
Independent Electricity System  
Operator (IESO)

- Stakeholder Engagement for Demand Response Working Group on July 18, 2017
- 

Submission by  
City of Toronto

## IMPROVED UTILIZATION OF DR

Proposed changes to dispatch criteria (Slide 8)

**IESO 3. Activation Length** – *“The length and hours activated are determined by how many consecutive hours are scheduled at PD-3 for the first scheduled hour, 1 hour as the min schedule and 4-hours as the max.*

**Question:** How would the IESO consider a participant who is operationally restricted to minimum 2- 4 hour DR activations?

Proposed changes to dispatch criteria: (Slide 10)

**IESO** *The analytical results below are modelled on data from May 2016 to June 2017 at DR specific locations, and assume a participant bid price of \$1999*

**Question:** Can the IESO share the dates and times of the modelled data from May 2016 to June 2017? The City would like to correlate the data with our historical consumption data to verify the impact.

## Utilization Payments – 2017 Work Plan Item

Discussion Paper Scope: (Slide 3)

**IESO** – *“DR Participation – The likely impacts of utilization payments to the dispatch frequency of HDR resources in Ontario “*

**Comment:** When compensated with utilization payments, HDR resources may benefit from increased activations including activations below \$100.

**Recommendation:** The City recommends that the IESO include an analysis of DR activations below the \$100 minimum price.

## PEAKSAVER TRANSITION AND DR AUCTION TARGET CAPACITY

Proposed Strategy to Transition (Slide 6)

*IESO- The proposal to transition peakersaver MW into the DR Auction target capacity over a three-year period.*

*IESO Summer 2019: Target Capacity plus estimated incremental transitioning peakersaver capacity OR minus over estimated peakersaver capacity (if necessary)*

**Question 1:** How does the IESO define peakersaver MW?

**Question 2:** What happens if the 2018 IESO auction results include a participant who implements new technology or behavioral DR instead of using existing peakersaver equipment?

**Recommendation:** The City recommends that “Peakersaver” capacity represent aggregated residential and small commercial loads. Similarly the 2019/2020 re-evaluation of peakersaver capacity would include available aggregated residential and small- commercial loads.