

Stakeholder Feedback Form

Capacity Auction Engagement Webinar January 23, 2020

Date Submitted: <i>2020/02/07</i>	Feedback provided by:
Feedback Due: February 7, 2020	Company Name: Advanced Energy Management Alliance (AEMA)
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Please provide comments on the section of the presentations delivered at the January 23 engagement session through the completion of this form. Please insert the feedback in the corresponding boxes in the table below.

For any questions or to submit this feedback, please email engagement@ieso.ca

IESO Engagement - Feedback from the January 23 Capacity Auction webinar:

June 2020 Capacity Auction

	Stakeholder Comments
Proposed rules amendments and next steps	

General Comments:

December 2020 Capacity Auction

Topic	Stakeholder Comments
<i>Broadening Participation</i> • Resource backed Capacity Imports	<p>As noted in public comments during the January 23rd IESO Capacity Auction Webinar and through comments posted on the public website, AEMA members are concerned that proposed priorities for DRWG members may be caught up in the longer forward periods. Those priorities will lead to a more efficient capacity auction resource and increased participation in the market – they should be reviewed with all reasonable alacrity.</p>
<i>Broadening Participation</i> • Self Schedulers	<p>For example, a Market Rule must be amended by August 2020 to ensure it will be part of the May 2022 commitment period (i.e. the capacity obligations allocated by the December 2020* auction). Therefore, AEMA highlights the need to move forward in an efficient manner on priorities and proposals to ensure changes may occur over the next two years. There is a real risk that critical market improvements will slip into the 2024/25 delivery year or later.</p>
<i>Market Power Mitigation Mechanisms</i>	<p>The priorities identified in the 2020 Work Plan for the DRWG continue to be of importance to the DR community; however, additional priorities have been identified, leading to an efficient resource mix being procured through the Capacity Auction for the upcoming commitment periods. This includes:</p>
<i>Auction Engine Mechanics</i>	<ul style="list-style-type: none"> - Minimum resource size for participation in IAM - Separation of aggregation – per zone: Ability to have more than one resource per market participant in one zone

	<ul style="list-style-type: none"> - Separation of aggregation – for testing: Allow individual resources within an aggregation to be exempt from retesting if cleared initial test. For example, PJM allows the re-testing of only individual resources (“Registrations”) under reasonable conditions. - Changes to testing for dispatchable loads: Dispatchable loads demonstrate their DR capacity by following dispatch instructions. Dispatchable loads should only be tested if they do not receive a dispatch instruction demonstrating the DR capacity obligation within the DR availability window. <p>*AEMA recognizes the proposal to move the “December 2020” Auction to March 2020 outlined in the February 11th Stakeholder Advisory Committee meeting materials.</p>
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General Comments:

Advanced Energy Management Alliance (AEMA), is an alliance of providers and supporters of distributed energy resources, including demand response (“DR”) and distributed generation, united to advocate for policies that empower and compensate customers appropriately in a manner which contributes to a more efficient, cost effective, resilient, reliable, and environmentally sustainable grid. The above comments reflect the opinions of AEMA as an organization not those of any individual member.