

Feedback Form

Distributed Energy Resources (DER) Market Vision and Design Project – October 20, 2021

Feedback Provided by:

Name: Matt Burton

Title: VP of Business Development

Organization: Recurve

Email: [REDACTED]

Date: 11/9/2021

Following the October 20th public webinar on the DER Market Vision and Design Project, the Independent Electricity System Operator (IESO) is seeking feedback from participants on the focus areas and questions for Phase I of the project, whether the scope of the project is clear, and any additional inputs to the project the IESO should consider.

The referenced presentation can be found on the [DER Market Vision and Design Project webpage](#).

Please provide feedback by November 10, 2021 to engagement@ieso.ca. Please use subject header: *DER Market Vision and Design Project*. To promote transparency, this feedback will be posted on the [DER Market Vision and Design Project webpage](#) unless otherwise requested by the sender.

The IESO will work to consider and incorporate comments as appropriate and post responses on the webpage.

Thank you for your contribution.

Phase I focus areas and questions

Topic	Feedback
Has the IESO identified the right focus areas and questions to complete Phase I of this project?	Recurve believes that the focus areas and goals established for the project are foundationally correct.

Project scope and inputs

Topic	Feedback
Is the scope of the project clear? If not, what additional information would be most helpful at this early stage?	<p data-bbox="933 541 1502 737">IESO currently has participation pathways for both single DERs and aggregated DERs. Is the goal of the project to alter these participation pathways, or create entirely new participation pathways?</p> <p data-bbox="933 783 1502 1052">Two of the focus areas is IESO-Distributor Coordination and Metering/Settlement. Is it within the scope of this project to set up customer-level meter data transfer between electric distribution companies and IESO for consistent, large-scale metering and settlement?</p>
Are there other inputs to the project that the IESO should consider?	<p data-bbox="933 1094 1502 1247">Recurve would encourage IESO to consider the Demand FLEXmarket case study in California in regard to participation pathways and M&V methods for IESO.</p> <p data-bbox="933 1293 1469 1446">In addition, we would encourage IESO to review Recurve's CAISO report regarding enhanced M&V methods for settlement purposes.</p> <p data-bbox="933 1493 1502 1682">Recurve is always available to attend a call with the IESO team to provide an overview for both of these case studies. We have attached documentation surrounding them for convenience.</p>

General Comments/Feedback

Recurve Background:

Recurve is an industry leader in meter-based demand flexibility. Recurve provides transparent, accessible analytics to track changes in consumption and demand due to program interventions for both individual buildings and in aggregate to support resource planning and facilitate performance-based transactions. We have consistently encouraged and supported market-based solutions for decarbonization that have the ability to scale and ensure demand-side resources can make a meaningful contribution to the grid.

Recurve General Comments/Feedback

Recurve is encouraged by IESO's dedication for designing a market focused around DER participation. In general, we would like to recommend that IESO:

- Set aggregation MW thresholds as low as possible to encourage early participation.
- Streamline participation pathways to account for the large number of aggregated resources that will be brought to market.
- Implement robust, consistent, transparent, and reproducible M&V methods for large-scale metering and settlement of behind-the-meter assets. Recurve recommends settling resources (especially those part of a larger aggregation) at the utility interval meter to significantly streamline M&V as opposed to device-level DER settlement. Device-level settlement introduces uncoordinated data streams, irreproducible M&V models, and uncertainty into the results pool for settlement purposes that can hamper implementation and participation.
- Streamline meter data collection for aggregated resources participating in the IESO market, to reduce any data collection burdens for aggregators.