

Feedback Form

Enabling Resources – April 21, 2021

Feedback Provided by:

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Following the April 21, 2021 webinar on Enabling Resources, the IESO is seeking feedback from participants on the analysis, prioritization and sequencing approach and outcomes, the engagement plan objectives, and additional stakeholder inputs and considerations. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the April 21, 2021 entry on the [Enabling Resources webpage](#).

Please provide feedback by May 12 2021 to engagement@ieso.ca. Please use subject: *Feedback: Enabling Resources*. To promote transparency, this feedback, if provided in an AODA-compliant format (e.g. using this form) will be posted on the [Enabling Resources webpage](#) unless otherwise requested by the sender.

Thank you for your time.

Analysis and approach

Topic	Feedback
Are there resource enablement opportunities missing from this analysis?	<p>AEMA would like to confirm that aggregated DR, similar to aggregation models found in AESO and ISO-NE will be studied under the Demand Response banner. Flexibility should not be limited to just load resources that have behind the meter storage or generation as per the example given.</p> <p>AEMA supports the inclusion of enhanced participation models for DERs including aggregations to provide capacity, and energy. This should also include operating reserves (versus 'potentially OR'). Aggregation has been proven as a valuable and reliable participation model for resources in ISOs throughout North America, including the HDR resource in Ontario.</p>
Is the prioritization and sequencing approach sound and is there clear alignment between the approach and the analysis presented today?	<p>An identified limitation has been resources/capacity within the IESO to handle the Resource Type Enhancements identified in the prioritization. IESO should be clear in the issues that it is facing – if the IESO is not properly resourced then this should be dealt with in the appropriate venues. To ensure Ontario keeps up with the energy transition, the agencies need to be properly resourced.</p> <p>The prioritization and sequencing does not take into account the hundreds of MWs that already exist behind the meter, that want to participate in the wholesale (and potentially distribution) markets. Instead, the focus of prioritization is on the anticipation of assets over the next two decades. If a capacity gap is expected to emerge, the focus should be enabling what already exists and could provide value to the electricity system in Ontario.</p>

Additional input

Topic	Feedback
<p>Do stakeholders have additional information or comments on input assumptions for consideration (e.g. limited resource life after contract expiration, additional contribution to meeting local system needs?)</p>	
<p>Do stakeholders agree with the prioritization outcomes?</p>	<p>As noted above, the IESO should take into account the current status of the resource in the IESO prioritization list (especially those resources that are already 'on the ground'). HDR resources have participated formally in some form in the electricity system since the creation of the original Demand Response programs at the OPA, yet, only have access to one 'market'/revenue stream. They are not under contract and have not been since the end of the OPA DR3 program – they are exposed to the market risks and non-transparent decisions by IESO (such as not procuring MW in winter 2021/2022). Other resources are under a contract for a specified time frame and have not been exposed to the risk of the market. The HDR resources ability to participate in Operating Reserves should move to a high priority project for IESO and should be enabled as soon as the MRP project is implemented. The IESO should launch the engagement on the a Grid Innovation Fund pilot in Q2 to ensure the findings are ready to be implemented.</p>
<p>Are there any additional timing considerations IESO should be aware of (e.g., time-sensitive resource re-investment decisions)?</p>	<p>Unlike other resources identified in the prioritization, HDR resources are only able to participate in one market and have access to only one revenue stream that is highly dependent on market risk and IESO's past non-transparent decision making.</p> <p>Valuable MW that can provide cost-savings to customers are being left out of competitive markets/procurements. The</p>

Topic	Feedback
	IESO needs to move forward with the enablement of the identified resources with a much quicker pace than identified in the sequencing/prioritization plan. FERC has identified this need with the FERC Order 2222 and ISOs are currently outlining their compliance plans. IESO should follow suit.

Engagement Plan

Topic	Feedback
Are stakeholders supportive of the objectives and approach detailed in the draft Enabling Resources Engagement Plan?	

General Comments/Feedback

AEMA is a North American trade association whose members include distributed energy resources (“DER”), 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. These comments represent the views of AEMA as an organization, not any individual company.