

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
<p>Are there resource enablement opportunities missing from this analysis?</p>	<p>The IESO should tease out the broad category of “Distributed Energy Resources” in more detail. As was noted at the session and in previous engagements, there are many types of DER’s, some of which may be suitable for market participation, others of which may not. In this regard, it should also be noted that the Resource Adequacy Framework is supposed to include “Programs” to facilitate “Investments in assets, resources and businesses that can meet both electricity and non-electricity objectives.”</p>
<p>Is the prioritization and sequencing approach sound and is there clear alignment between the approach and the analysis presented today?</p>	<p>The IESO has proposed the following criteria for the purposes of option evaluation:</p> <ul style="list-style-type: none"> • The timing and magnitude of forecasted system needs; • The timing, quantity (MW), and capability, that would be made available by each enablement opportunity; • Potential interrelationships between enablement opportunities; and • IESO capacity (e.g. human resources, budget availability, etc.) for additional initiatives <p>It would be helpful to add the concept of “ease/cost of implementation” to this framework, both with respect to the IESO and to prospective market participants.</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>The direct linkage of this initiative to the Resource Adequacy Framework must be noted. That framework, as currently proposed, will not support ongoing investment in Ontario’s 224 hydroelectric</p>

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	<p>facilities – 145 of which are Distributed Energy Resources. The IESO's focus on acquiring or re-acquiring resources with short term commitments (Capacity Auction, mid-term RFP commitment for a period of three (3) years) is fundamentally inconsistent with the long lifespan and long capital investment lead times that define hydroelectric assets. As such, efforts to enable the participation of Distributed Hydroelectric Resources in the market are likely to be frustrated.</p>
Do stakeholders agree with the prioritization outcomes?	
Are there any additional timing considerations IESO should be aware of (e.g., time-sensitive resource re-investment decisions)?	<p>There are a number of distributed resources that are scheduled to come off contract before this initiative is completed. What is the IESO's plan to address this situation?</p>

Engagement Plan

Topic	Feedback
Are stakeholders supportive of the objectives and approach detailed in the draft Enabling Resources Engagement Plan?	<p>The IESO has identified the following as its engagement objectives:</p> <ul style="list-style-type: none"> • To ensure that stakeholders understand the purpose of this initiative; • To purposefully engage on the development of the work plan, incorporating stakeholder feedback and considerations where possible; • To produce an integrated work plan that will outline the sequencing, timing and scope of activities to be undertaken by the IESO to enable existing electricity resources to provide electricity system services that they cannot fully provide under current market design.

Topic	Feedback
	<p data-bbox="935 163 1495 321">To this, and consistent with the emerging approach the IESO is taking in other engagement initiatives, it is suggested that the following be added:</p> <ul data-bbox="984 363 1495 756" style="list-style-type: none"><li data-bbox="984 363 1495 520">• To provide stakeholders with transparency with respect to the data and information used to inform and arrive at decisions<li data-bbox="984 520 1495 756">• To provide stakeholders with timely and comprehensive responses to input and advice received and an indication on how input has been considered and applied, as appropriate.

General Comments/Feedback