



Enabling Resources – April 21, 2021

Feedback Provided by:

Name: Michael Pohlod

Title: Senior Energy Markets Manager

Organization: Voltus Energy Canada Ltd.

Email: [REDACTED]

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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?	Yes. Voltus is aware of at least one non-dispatchable generator that is currently unable to provide Capacity and could do so easily, but this situation is not addressed in this analysis
Is the prioritization and sequencing approach sound and is there clear alignment between the approach and the analysis presented today?	The prioritization and sequencing is generally sound and aligned with the analysis, except that Demand Response's priority should be aligned with or included among other DERs. In its Enabling Resources Presentation, the IESO identified Demand Response as a Medium Priority Resource and DERs as a High Priority Resource. We believe that DR and DERs are two sides of the same coin and our participation in ERCOT, MISO, CAISO, PJM, NYISO, SPP and ISO-NE has reinforced this understanding. These ISOs are driving participation in all of their markets for heterogeneous aggregations of demand-side storage, demand response, and demand-side generation. These resources all participate behind the utility meter, are offered in as aggregated volumes, have their performance assessed individually and then the aggregation is settled based on the aggregate performance of each individual site. Voltus believes that this is an appropriate opportunity to properly align the IESO's demand side participation models with other North American ISOs and as a result, should view both resources as having the same priority.

Additional input

Topic	Feedback
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?)	Voltus disagrees with the estimated quantity of Demand Response that may be available to provide Opportunity Reserves. There are a large number of non-dispatchable loads and other participants that are able to respond on a 10-minute or 30-minute basis that use technologies other than energy storage.
Do stakeholders agree with the prioritization outcomes?	Voltus would like to see Demand Response prioritized equal to other DERs. A pilot can still be used to test different participation models at this level in the system; however, the IESO needs to drive changes to how DR/DERs are modelled in its system and enable virtual aggregations of heterogeneous resources to provide all products that they are able to provide. This will align the IESO with other North American ISOs.
Are there any additional timing considerations IESO should be aware of (e.g., time-sensitive resource re-investment decisions)?	

Engagement Plan

Topic	Feedback
Are stakeholders supportive of the objectives and approach detailed in the draft Enabling Resources Engagement Plan?	Voltus is concerned with the lack of mention of the Demand Response OR pilot within the stakeholder engagement plan. Voltus would appreciate the IESO providing detail on the

	forecasted timing and scale of this pilot, or a timeline on when this information will become available.
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General Comments/Feedback

Voltus is broadly supportive of this initiative and is looking forward to the development of new participation models that enable the full dispatchability of Distributed Energy Resources and Demand Response. One question that remains: Is the IESO able to confirm if the Market Integration of Hybrid Storage-Generation Resources will also address current barriers preventing large embedded storage resources from participating in Operating Reserves?