

# Feedback Form

## Enabling Resources Program (ERP) - Storage and Co-located Hybrid Integration Project

Meeting Date: May 20, 2026

### Feedback Provided by:

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Date: June 5, 2026

Following the **May 20, 2026**, webinar, the Independent Electricity System Operator (IESO) is seeking feedback on the items discussed during the webinar. The presentation and recording can be accessed from the engagement web page.

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by June 5, 2026.** If you wish to provide confidential feedback, please submit it as a separate document, marked "**Confidential.**" Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

## Design Memo Feedback:

The following tables are intended to capture feedback on the four design memos within Phase 1 of the ERP Storage and Co-located Hybrid Integration project.

<b>Optimization</b>	<b>Feedback</b>
Please provide any final feedback or concerns with the design concepts outlined in this memo prior to pivoting to the implementation and rules phase of this engagement.	<ul style="list-style-type: none"><li>• ESC requests additional clarity on how the optimization engine will prioritize storage dispatch when State-of-Charge (SoC) constraints interact with system needs, particularly during tight supply or high-volatility periods.</li><li>• More transparency is needed on how violation pricing will be applied when SoC limits are binding, and how frequently the engine is expected to rely on violation relaxation for storage.</li><li>• Further detail is required on how the engine will treat storage during uncertainty events (e.g., forecast error, ramping, reserve scarcity) to ensure storage is not disproportionately constrained.</li><li>• ESC seeks confirmation that the transition to a Single Model Storage Resource (SMSR) will not disadvantage storage relative to legacy dual-resource configurations.</li></ul>
Please note any requests for specific scenarios that you would like the IESO to consider in additional "Day-in-the-Life" examples to support the next phase of engagement.	

<b>Connection and Registration</b>	<b>Feedback</b>
<p>Please provide any final feedback or concerns with the design concepts outlined in this memo prior to pivoting to the implementation and rules phase of this engagement.</p>	<ul style="list-style-type: none"> <li>• Registration timelines for new parameters (Absolute Max/Min SoC, Cycle Efficiency, bi-directional capability) should reflect commissioning realities, as many values cannot be finalized until late-stage testing.</li> <li>• ESC requests clarity on how auxiliary load and Internal Service Load (ISL) will be treated within SoC calculations and settlement, given that ISL varies with operating conditions.</li> <li>• The process for updating registration parameters (e.g., MaxSoC) should be streamlined to avoid delays in MIM validation that could affect operational flexibility.</li> </ul>
<p>Please note any requests for specific scenarios that you would like the IESO to consider in additional “Day-in-the-Life” examples to support the next phase of engagement.</p>	

<b>Dispatch Data and Other Inputs</b>	<b>Feedback</b>
<p>Please provide any final feedback or concerns with the design concepts outlined in this memo prior to pivoting to the implementation and rules phase of this engagement.</p>	<ul style="list-style-type: none"> <li>• ESC requests clarity on how the DSO will reconcile discrepancies between telemetered SoC and submitted SoC limits, and how such discrepancies will affect dispatch.</li> <li>• More detail is needed on how Cycle Efficiency is applied in real time, especially when telemetered SoC diverges from calculated SoC.</li> </ul>

<b>Dispatch Data and Other Inputs</b>	<b>Feedback</b>
Please note any requests for specific scenarios that you would like the IESO to consider in additional “Day-in-the-Life” examples to support the next phase of engagement.	

<b>Market Power Mitigation (MPM)</b>	<b>Feedback</b>
Please provide any final feedback or concerns with the design concepts outlined in this memo prior to pivoting to the implementation and rules phase of this engagement.	<ul style="list-style-type: none"> <li>• ESC supports the exclusion of charging laminations from ex-ante mitigation but requests additional transparency on monotonicity adjustments to ensure economic signals are not distorted.</li> <li>• The energy reference level methodology (charging cost + opportunity cost) must reflect real-world cycling economics rather than theoretical arbitrage assumptions.</li> <li>• Operating reserve reference levels should explicitly incorporate auxiliary load and inverter efficiency impacts to ensure accurate cost representation.</li> </ul>
Please note any requests for specific scenarios that you would like the IESO to consider in additional “Day-in-the-Life” examples to support the next phase of engagement.	

## General Comments/Feedback

Energy Storage Canada (ESC) appreciates the opportunity to provide feedback on the IESO’s May 20 webinar and the associated Phase 1 design memos for the Storage and Co-located Hybrid Integration Project. ESC supports the IESO’s continued leadership in advancing a modernized storage participation model and the transition to a unified SMSR.

Given the scale of change introduced through the ERP, ESC encourages the IESO to provide clear, operator-focused guidance and training materials to support a smooth transition for market participants. Ensuring that participants understand how the new model functions in practice will be essential to successful implementation.

ESC also highlights the value of a testing or simulation environment that would allow operators to validate their systems and processes ahead of Phase 1 go-live. This would help reduce operational uncertainty and support more accurate participation from day one. One option could include developing a test case with a single proponent to ensure the program runs smoothly before the full rollout.

ESC looks forward to continued collaboration with the IESO to ensure the ERP reflects operational realities and enables storage to fully support system reliability and affordability. We appreciate the IESO's consideration of this submission and its ongoing engagement with the storage sector.