Feedback Form

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

Phase 1 Settlements Design Module

Meeting Date: August 6, 2026

Feedback Provided by:

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Date: Aug 20, 2026

Following the **August 6, 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 by **August 20, 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.

Stakeholder Feedback:

Feedback Question	External Feedback
Please provide feedback on the overall Settlements design within the Storage project of ERP.	(1) Atura remains concerned with the proposed claw back of Day-Ahead Make-Whole Payments (MWPs) against profits earned in other hours. MWPs are intended to compensate resources for uneconomic dispatch decisions and should not be offset by revenues earned during separate dispatch periods, as this weakens the fundamental purpose of the mechanism. (2) The proposal appears to treat storage resources differently from other market participants without sufficient justification. The examples cited for hydro resources and Generator Offer Guarantee (GOG) programs are not directly comparable to storage resources, raising concerns regarding consistency and equitable treatment across resource types. (3) Atura continues to have concerns regarding the Initial State of Charge (ISoC) proposal. Requiring storage resources to submit an initial State of Charge well in advance introduces financial and operational risks when actual operating conditions differ from forecasts. Additional clarity is needed regarding how these risks will be managed.
Please provide specific scenarios or examples you would like the IESO to consider in the upcoming engagement on Make-Whole Payments for Energy Limited Resources in Q3 or Q4 of 2026.	Click or tap here to enter text.

General Comments/Feedback

Before moving forward with any market design changes, the IESO should conduct and publish a detailed assessment of the size, frequency, and materiality of the issues it is seeking to address, including "over-compensation" concerns and ISoC-related risks. Stakeholders would benefit from analysis based on actual market outcomes and settlement data, including practical examples demonstrating the impact of the proposed changes. Such evidence is necessary to determine whether the benefits of the proposed changes outweigh their potential adverse impacts on market efficiency, participant behaviour, and future procurement outcomes.