Feedback Form

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

Phase 2 - Regulation Service Design

Meeting Date: October 15, 2026

Feedback Provided by:

Name: Bennett Gardiner

Title: Head of Energy Management Americas

Organization: Neoen Renewables Canada Inc.

Email: [redacted]

Date: 2026-10-30

Following the **October 15** session, 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 **October 30, 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 this session and any input on the engagement process for future sessions.	Neoen wants to thank the IESO for their work on this engagement session. Perhaps in future sessions IESO could present some more examples of how a typical BESS could respond to the sample AGC signals the IESO have provided, including details on how participation in real time and operating reserve is affected, and how settlements are determined.
Please provide feedback on the eligibility requirements.	It's still not entirely clear to Neoen how a battery will qualify a portion of its capacity, and how changes or derates in available power, usable energy and SOC limitations will affect eligibility over time. It would also be useful to hear how the proposed 10MW minimum for eligibility was derived, and whether there is a maximum amount of regulation IESO would want to procure from individual facilities.

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Please provide general feedback on the participation model.	Neoen understands that facilities should be able to support both raise and lower regulation while charging and discharging. Neoen asks the IESO preserve a pathway toward separate regulation-up and regulation-down products, and eventual co-optimization with energy and operating reserve, in line with the flexibility of this product in other markets (such as the NEM). We would also like full clarity on how participation in regulation services would interact with our must-offer obligations under the LT1 / LT2c contracts, and how if at all this might change in future procurements. We generally support removing the blanket ramp-rate limit during regulation provision, subject to AGC respecting validated facility-specific limits. Please clarify how these limits, temporary deratings, response-time requirements and associated performance assessments will be coordinated.
Please provide feedback on the energy reservation approach of the participation model.	IESO could perhaps provide some validation of the proposed one-hour day ahead/pre-dispatch reservation and ten-minute real-time buffer using a simulated typical battery and the historical AGC signal provided, and provide worked examples of SoC recovery during sustained directional regulation, explaining how costs from required uneconomic dispatch would be treated.

Feedback Question	External Feedback
Please provide feedback on enabling simultaneous regulation service and operating reserve participation for all resources.	Neoen understands this is more complex operationally, but support simultaneous participation, subject to explicit power, ramp-rate and energy constraints to ensure both commitments can be delivered together. IESO should make clear the service that takes precedence in a given situation, and make sure that following one instruction in regulation does not constitute a failure to provide operating reserve (for instance).
Please provide feedback on the resource selection process of the participation model.	Neoen thinks the IESO should evaluate how the ability of BESS to respond extremely quickly and precisely to small and rapid changes to regulation requirements via AGC should be valued under its participation model, resource selection should recognize reliability contribution, cost of providing the service, demonstrated tracking accuracy, useful response speed and sustained availability.
Please provide feedback on the performance evaluation.	Neoen is generally supportive of the MAE method of measuring performance, alongside exceptions for availability and explicit treatment of missing data. We look forward to more advice regarding the effects of underperformance on the regulation capacity.

General Comments/Feedback

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