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: Faizan Farooqi

Title: Founder & Principal

Organization: Sedona Renewables Inc.

Email:

Date: October 28, 2026

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.

SEDONA RENEWABLES INC.
Development | Procurement | Delivery

FORMAL STAKEHOLDER FEEDBACK

Storage Integration | Phase 2

Regulation services | October 15, 2026 engagement

Submitted by	Faizan Farooqi | Founder & Principal, Sedona Renewables Inc.
Submission date	October 28, 2026
Consultation deadline	October 30, 2026

Position in brief. Sedona supports enabling transmission-connected single-model storage resources to provide regulation alongside energy and operating reserve where feasible. The value of this design is contingent on practical SoC constraints, auditable resource selection and performance measurement, clearly specified EMS/SCADA interfaces and predictable commercial rules before equipment procurement and financing.

Basis of this feedback. I am Faizan Farooqi, Founder & Principal of Sedona Renewables. I draw on more than 15 years in power and renewable-energy infrastructure, including owner-side development and delivery, technical due diligence, equipment procurement and commissioning interfaces. My conversations with project teams, technology suppliers, investors and operational stakeholders at recent industry events informed the emphasis on implementable control requirements and auditable revenue assumptions. The recommendations are my own.

Priority actions

- Validate the proposed full-hour day-ahead/pre-dispatch and 10-minute real-time SoC reservations using published stress cases.
- Define the interaction of regulation, energy and operating reserve (including reserve activation) and prevent double counting.
- Publish the performance-factor test method, telemetry tolerance and correction procedures before qualification.
- Release a FAT/SAT, AGC, SCADA, cybersecurity and communications checklist suitable for lenders and OEMs.
- Provide transition detail for Q1 2027 settlement-design engagement and later distributed-resource participation.

1 | Reserve sufficient energy without over-constraining dispatch

The October 15 presentation proposes adjusting SoC constraints to reserve energy for one hour of scheduled regulation in the day-ahead market and pre-dispatch, and for 10 minutes in the current real-time interval. These buffers are intended to assure regulation availability while allowing energy and operating reserve participation.

Request. Provide operating traces for neutral AGC, sustained upward/downward bias, nearly full and nearly empty batteries, high and low basepoints, efficiency losses, derates and an operating reserve activation. Show the impact on available energy and operating reserve, scheduled regulation MW, rejected awards and modeled reliability.

The one-hour reservation and ten-minute real-time buffer should be periodically tested against actual performance, with a transparent process for revisiting overly conservative reserves without compromising reliability.

2 | Resource selection and measurable reliability

The IESO proposes reliability-based regulation selection, considering ramp rate and offered capacity in advance of the day-ahead market. As a practical owner and controls-integration consideration, the criteria should be disclosed before resources spend capital on bidirectional inverters, control algorithms and communications upgrades.

Request. Publish the eligibility, minimum offered capacity and ramp requirements, validation priority and operational treatment of simultaneous energy and operating reserve obligations. Provide a path for resource owners to test expected eligibility using published plant and control-system specifications. Explain how cost is evaluated as regulation capability expands.

3 | Performance: distinguish controllable faults from system effects

The IESO discusses monthly evaluation using mean absolute error (MAE) against requested AGC setpoints, potentially informing capacity or ramp-rate adjustments. A single numerical metric is useful only if time alignment, data completeness and externally caused errors are handled consistently.

Request. Define timestamp synchronization, allowable telemetry delay, bad-data treatment, outage windows, AGC signal interruptions, deadbands, minimum sample density, communication failures and appeal rights. Distinguish resource non-performance from system-side setpoint errors, and publish a worked MAE/performance-factor report and remediation pathway before commercial testing.

4 | Technical readiness: commissioning is a contractual deliverable

Practical commissioning and operations often determine how fast a nominally ready asset can provide an ancillary service. Standardization avoids vendor-by-vendor interpretations at field acceptance.

Request. Provide a commissioning checklist for EMS/SCADA/AGC interface, supervisory control priorities, ramp tests, data-point lists, cybersecurity requirements, remote dispatch and fail-safe behavior, protection relays, metering and communications. Publish example factory acceptance (FAT), site acceptance (SAT) and integrated system acceptance scripts and clarify re-testing after firmware or control-system changes.

5 | Clear settlement and investor revenue allocation

The presentation defers detailed make-whole, EOP and settlement treatment to Q1 2027. Revenue modeling for financing should not assume a fully settled value stack before these rules are defined.

Request. Explain anticipated treatment of charging energy required for AGC, market revenues foregone due to regulation reservations, operating reserve activation and opportunity-cost netting. Publish worked one-day settlement scenarios before procurement, together with the contracted service performance and payment hierarchy.

6 | Roadmap for distributed and co-located resources

Phase 2 is focused on a specific resource model. The October 27 PULSE report and announced distribution-planning reforms highlight the wider need for coordination as the network sees higher load growth and increasing DER penetration.

Request. Identify, without expanding this Phase 2 scope unexpectedly, the technical prerequisites for future distribution-connected batteries, aggregators and co-located hybrid resources: utility telemetry responsibilities, baseline and metering standards, export constraints, safety, cyber interfaces, outage coordination and transparent visibility of local network capability. Meaningful local, municipal and Indigenous community engagement remains important at the physical project-siting stage, even if it is not a market-settlement rule.

Closing position

The IESO can strengthen market confidence and reliability by publishing rules that are independently testable, administratively feasible, and capable of being priced and delivered by accountable proponents. I would welcome continued technical engagement on these implementation details.

Faizan Farooqi
Founder & Principal
SEDONA RENEWABLES INC.
[redacted]

Reference material reviewed

IESO, Storage Integration Phase 2 October 15 presentation (slides 23-40) | Official source (click to open)

IESO, ERP Storage engagement | Official source (click to open)

Ontario, PULSE report issued October 27, 2026 | Official source (click to open)