Feedback Form

Hybrid Integration Project – January 27, 2022

Feedback Provided by:

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Following the January 27, 2022 webinar on the Hybrid Integration Project, the IESO is seeking feedback from participants on the proposed "day-in-the-life" for the foundational hybrid facility models, including any concerns from a participation perspective, as well as any dependencies between resources or technologies the IESO should be accounting for.

The referenced presentation can be found under the January 27, 2022 entry on the Hybrid Integration Project webpage.

Please provide feedback by February 17, 2022 to engagement@ieso.ca. Please use subject: *Feedback: Hybrid Integration Project.* To promote transparency, this feedback, if provided in an AODA-compliant format (e.g. using this form) will be posted on the Hybrid Integration Project webpage unless otherwise requested by the sender.

Thank you for your time.

Day-in-the-life Participation

Topic	Feedback
Did you see any concerns from a participation perspective for co-located or integrated facilities?	While the EDA has not identified any concerns from the perspective of a hybrid facility participating in the IESO market, we seek clarification of the LDC's role and duties related to hybrid facilities connected to the distribution system that wish to participate in the IAM. We also would like to explore the possibility of hybrid facilities offering services to LDCs for distribution services (e.g., as non-wires alternatives). Please see our General Comments below.
Are there any dependencies between resources or technologies that make up the hybrid models that the IESO should be accounting for?	The EDA has no comment on technological interdependencies.
Please indicate if you would like to set up a one-on-one call with the IESO team to discuss specific participation questions.	The EDA would appreciate the opportunity to review the concerns and questions noted below.

General Comments/Feedback

The EDA seeks clarity on matters pertaining to distribution connected generation facilities that will be eligible to become a hybrid facility and an IESO Market Participant (e.g., metering, settlement, payment, the applicability of the OEB's Distribution System Code, etc.). There are a significant number of distribution-connected wind facilities and solar facilities that were/are contracted by the IESO and the former Ontario Power Authority (e.g., RESOP and FIT projects). Today, most of these facilities are connected to distribution grids as embedded retail generators; they are not IESO Market Participants. Because they are embedded retail generators, the LDC meters them and they receive IESO contract payments via the connecting LDC in accordance with the Distribution System Code and Retail Settlement Code. Many of these projects are large scale (i.e., 10 MW) and, in the future, may be viable candidates for converting to hybrid facilities upon the addition of storage facilities. Also, in the future, new hybrid facilities may be proposed and connected to distribution systems in response to the IESO's Long-Term RFP.

Therefore, the EDA respectfully requests additional clarity on the following issues pertaining to an embedded retail generator converting to a hybrid facility and the future development of new hybrid facilities connected to the distribution system:

1. Will the embedded retail generators be required to notify the LDC and the IESO if they propose to become a hybrid facility?
2. Which party is responsible for metering infrastructure and the costs to complete any required changes when converting an existing embedded retail generator to a hybrid facility?
3. What is the LDC's role and duties to FIT/RESOP contract holders after they convert to a hybrid facility (e.g., settlement duties, role in facilitating payments)?
4. Since a FIT/RESOP generator that becomes a hybrid facility will be connected to the LDC's grid, please confirm that the LDC will continue to have visibility of the facility, post-conversion to a hybrid facility? Will LDCs have visibility of new hybrid facilities connected to the distribution system?
5. How can a distribution connected hybrid facility be utilized to provide distribution grid services to an LDC (i.e., as a non-wires alternative)?

Overall, the EDA is supportive of the IESO's Hybrid Integration Project. We believe there is benefit in leveraging existing renewable generation assets – by expanding them, firming their capacity with storage and providing them with flexibility to choose to participate in the IAM.

Thank you for your consideration of our comments. We appreciate that some of these topics may be well-suited for discussion in other IESO stakeholder engagements as well (e.g., the TDWG, etc.). We hope that the IESO acknowledges the overlap of these matters among different engagements.