Feedback Form

Hybrid Integration Project – April 22, 2022

Feedback Provided by:

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Following the April 22, 2022 webinar on the Hybrid Integration Project, the IESO is seeking feedback from participants on the foundational participation models, as well as on the enhanced participation models and participation model study being conducted by EPRI.

The referenced presentation can be found under the April 22, 2022 entry on the Hybrid Integration Project webpage.

Please provide feedback by May 13, 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.

Foundational participation models

Topic	Feedback
Are there any other items where the IESO could provide further clarification?	The EDA suggests that the IESO review its connections processes applicable to embedded wholesale market participants. As embedded renewable generators may be motivated to convert to hybrid facilities, possibly in large numbers, we see merit in the IESO's processes being scalable. We acknowledge the IESO's position is that "embedded retail generation and hybrids intending to participate in the IAMs must follow established authorization and registration processes, along with any applicable LDC requirements". We point out that these processes were developed during a period of slow resource development. They have not been updated since, e.g., to align with the anticipated magnitude or timing of supply needs as described in the IESO's Annual Acquisition Report (AAR).

Enhanced participation models

Topic	Feedback
Are there any additional data sources the IESO should consider when developing enhanced hybrid participation model?	The EDA suggests that, among the additional data sources, the IESO review and consider includes its Long-Term Storage Design Vision that was issued in September of 2020. We understand that the detailed design has not been finalized (e.g., it does not incorporate the long-term participation model for stand-alone energy storage, including changes made to the design to reflect MRP implementation). Accordingly, we seek clarification of whether additional stakeholder engagement will be provided.

EPRI participation model study

Topic	Feedback
What additional scenarios and sensitivities should be considered through the EPRI study?	The EDA proposes that the IESO engage stakeholders generally in a review of the EPRI study, beginning with a review of its scope and purpose. If the IESO is attempting to understand the benefits of implementing the longer-term vision for energy storage integration in the IAM, then there will be a need to link it to the necessary investment in IESO's dispatch tools. We see a need for a wider sector engagement on EPRI's work. Among other things, EPRI was tasked with evaluating the enduring market design for stand-alone energy storage as well as evaluating the benefits of the enduring storage design for hybrids. It is clear that the scope of EPRI's assignment on benefits overlaps with the IESO's activities and that EPRI will consider both hybrids and energy storage generally. The EDA expects the IESO to simultaneously address which market enhancements to enable, informed by the plan to acquire resources, and the deployment of MRP. Ontario is facing an anticipated supply shortage, as outlined by the IESO's AAR, and a significant amount of new energy storage and hybrid resources are expected to be developed to meet those needs. We propose that the IESO act expediently to ensure that it has the appropriate tools in place as the supply mix shifts to include more energy storage resources. The consequences of delay or proceeding sequentially may contribute to both the size and urgency of the supply shortage.

General Comments/Feedback

The EDA supports the IESO's focus on the Hybrid Integration Program and proposes that the IESO and LDCs establish coordinated approaches for reviewing existing processes as well as new processes (e.g., to ensure that they are adequate to handle the volume of activity anticipated through the IESO's upcoming procurements). As is outlined in the IESO's AAR, an unprecedented amount of resource development is needed in Ontario. This is expected to result in both new resources and uprated resources being connected, whether to the transmission gird or to the distribution grid. Storage offers the potential to 'firm up' (e.g., reduce variability) the capacity of existing and new resources as the forecasted need for electricity supply grows.