

Market Development Advisory Group – Feedback Form

Meeting Date: April 2, 2020

<u>Date Submitted:</u> <i>2020/04/27</i>	<u>Feedback Provided By:</u> Organization: Energy Storage Canada Main Contact: Justin Wahid Rangooni, Executive Director Email: [REDACTED]
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Following the April 2, 2020 Market Development Advisory Group webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the following items discussed during the meeting. The presentation, which contains the information related to these feedback requests, can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by April 27, 2020. If you wish to provide confidential feedback, please submit 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 Table

Feedback Topic	Requests	Stakeholder Feedback
Expanding Participation in Operating Reserve and Energy	Is our current focus of generator/load with behind-the-meter storage solutions consistent with stakeholder expectations of what “hybrid participation” consists of?	The focus would appear to capture the majority of the current developments in the province and it should work with the potential opportunities that will arise as the FiT contracts expire and these resources seek to increase their capacity capabilities through the addition of storage to their resource.
	Do stakeholders have experience with hybrid participation in other jurisdictions? If so, are there any learnings we should be considering from other system operators?	IESO should carefully review the CAISO and NYISO stakeholder engagements, and other ISO/RTO initiatives, regarding enabling participation of hybrid projects within their respective wholesale electricity markets.
	Are the requirements to participate in energy and operating reserve (OR) clear and understandable?	Yes
	Based on the models and opportunities presented, is it clear what could be limiting a resource from participating?	Yes, but the restrictions on participation for Demand Response resources have been managed in other jurisdictions and EPOR-E should investigate the potential to implement similar resource types and procedures to further enhance the IAM.
	Based on the information that was presented, are your resources or a subset of your resources capable of meeting our current requirements?	The work being done in the MDAG and ESAG will need to merge at some point as the MDAG does not discuss Energy Storage as a resource and therefore it is not included in this evaluation. It is Energy Storage Canada’s hope that the work being done in the ESAG will eliminate the barriers currently restricting the participation of Energy Storage in all aspects of the IAM.
	Have you come across similar issues for participation in other markets?	IESO should carefully review the CAISO and NYISO stakeholder engagements, and other ISO/RTO initiatives, regarding enabling participation of hybrid projects within their respective wholesale electricity markets.
	Are you interested in participating in an individual teleconference with the IESO to discuss any participation issues for the resource types identified?	

Transmission Rights Clearing Account (TRCA) Disbursement Methodology	Please provide feedback on the revised disbursement methodology proposal here.	No comment
Transmission Rights Market Review	Please provide any feedback on the engagement approach here.	No comment
	Is the proposed scope appropriate?	No comment
	Does the sequencing of stages make sense or should MRP changes be prioritized?	No comment
	Are the timelines realistic?	No comment
	What stakeholder constituents would be most interested in participating in the review?	No comment
	How often would MDAG like to be engaged?	No comment
	What level of involvement would MDAG like to play?	No comment
	What do MDAG members believe is the purpose of the TR market?	No comment
<p>General Comments:</p> <p>Energy Storage Canada (ESC) appreciates the work the IESO is doing to enhance the ability for all resource types to participate in the IESO Administered Markets. ESC would like to see the EPOR-E consultation expanded to include Demand Response resources beyond the current defined HDRs. Other jurisdictions have managed to access the potential of DR or behind the meter storage resources and it would create a more efficient IAM if this was included in the consultation.</p> <p>ESC is concerned the work on the Increasing Competition in Ancillary Services through Regulation Service Procurement may have stalled or potentially ceased. While it is recognized moving the Regulation Service procurement from the RFP process to an auction may have some technical issues that will require investment by the IESO, there has already been investment in Energy Storage facilities that would participate in the proposed auction process. ESC would like to see the continued evaluation of this item in the MDAG Workplan.</p>		

