

# MRP Energy Detailed Design Document: OFFERS, BIDS AND DATA INPUTS

## Stakeholder Feedback Form

<b>Date Submitted:</b>	August 14, 2020
<b>Feedback Due:</b>	July 24, 2020
<b>Feedback Provided by:</b>	
Company Name:	Advanced Energy Management Alliance
Contact Name:	Katherine Hamilton, Executive Director
Phone:	████████████████████
Email:	████████████████████

The IESO is posting a series of detailed design documents which together comprise the detailed design of the MRP energy stream.

This design document is posted to the following engagement webpage: <http://ieso.ca/en/Market-Renewal/Energy-Stream-Designs/Detailed-Design>

Stakeholder feedback for this design document is due on **July 24, 2020** to [engagement@ieso.ca](mailto:engagement@ieso.ca).

Please let us know if you have any questions. IESO Engagement.

**General feedback on the Detailed Design Document** (please expand any section as required)

## **Introduction**

Advanced Energy Management Alliance (“AEMA”)\* has become aware of a harmful design element that straddles several Detail Design documents recently posted. The DD documents referenced are “Offers, Bids and Data Inputs”, “Market Settlements” and “Facility Registration”. The element of concern is the relationship between “Hourly Demand Response” resources and “Price Responsive Loads”. In the current framework Non-dispatchable (“ND”) loads are permitted to participate as a virtual DR resource in an aggregated portfolio. Some customers opt to participate in this manner to reduce risk and maximize value.

In the Facility Registration Detail Design Document Section 3.5.2 Load Facilities, under the heading “Virtual Hourly Demand Response Resources” it is stated “A virtual hourly demand response resource can continue to only be registered to fulfill a virtual demand response capacity obligation with non-dispatchable loads and/or virtual contributors that are not metered with the IESO. As with dispatchable loads today, a price responsive load will not be able to register as a contributor to a virtual hourly demand response resource.”

Price responsive loads (“PRL’s”) will be able to participate in the Day-ahead market and secure financially binding energy positions which is expected to deliver increased efficiencies to the market. They will continue to be non-dispatchable in Real Time, so ND Loads that choose to also be a price responsive load will not be able to continue the current option to participate in an aggregated portfolio.

As the Capacity Market continues to evolve and forward delivery periods become more distant into the future and loads make commitments with their DR provider, they will limit their ability to opt to become PRL’s for years.

The IESO has indicated this is a tool limitation and is not a desired Market Design outcome. After discussions with other stakeholders, it is apparent this consequence was not identified during the review of the Facility Registration Detailed Design document.

AEMA suggests the IESO reconsider this design element and present the issue to the broader stakeholder community for further discussion and possible solution.

\*AEMA is a North American trade association whose members include distributed energy resources, demand response (“DR”), and advanced energy management service and technology providers, as well as some of Ontario’s largest consumer resources, who support advanced energy management solutions due to the electricity cost savings those solutions provide to their businesses. The comments herein represent those of the organization, not those of any individual member.

Design Document: Section	Detailed Comments (Areas of Support or Concern)
1. Introduction	
2. Summary of Current and Future State	
3. Detailed Functional Design	
4. Market Rule Requirements	
5. Procedural Requirements	
6. Business Process and Information Flow Overview	