Resource Adequacy – Feedback Form

Meeting Date: September 28, 2020

Date Submitted:	Feedback Provided By:	
YYYY/MM/DD	Organization:	Peterborough Utilities Inc.
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Following the September 28, 2020 Resource Adequacy webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the following items discussed during the webinar. More information related to these feedback requests can be found in the presentation, which can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by October 20, 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.

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Stakeholder Feedback Table

IESO Requests	Stakeholder Feedback
Principles to Guide the Resource Adequacy Framework Conversation	
The IESO proposes to use the MRP guiding principles to guide the discussion with stakeholders on the development of a high-level Resource Adequacy framework. Are there other principles that should be considered throughout this discussion?	The MRP guiding principles are stated as efficiency, competition, implementability, certainty and transparency. In addition, the IESO should be considering the principles of sustainability (i.e. climate change, environmental impacts), security & reliability (i.e. through decentralized and distributed energy resources) and non-electricity benefits that provide a common good. We recognize that several of these additional principles may require the support of government policy. Accordingly, the IESO should be advancing with engagement of government and stakeholders in parallel with the MRP engagement to address these principles and all options for meeting resource adequacy.
Draft Resource Adequacy Framework	
Do these three capacity acquisition timeframes (commitment and forward periods) provide sufficient options for meeting the needs of your resource type?	The commitment periods for undertaking major upgrades (3-4 years) and for new builds (5+ years) is, in our opinion, inadequate to support undertaking renewable generation projects that are capital intensive, but have low ongoing O&M costs. Furthermore, these commitment periods appear inadequate to support third party financing of such major upgrades or new builds.
Which option(s) are most suited to your resource type?	All of our resources are distributed renewable energy resources. We are currently not market participants. The MRP appears solely focused upon market participants but has not provided any clarity on the role of DER's in addressing resource adequacy. We believe that the IESO needs to include engagement on and prepare a framework for the important and growing role that DER's will contribute to meeting resource adequacy.
Based on timing when various mechanisms are going to be available, do you see timing gaps when a resource needs a mechanism before that mechanism is ready?	In addition to addressing the role of DER's, the three identified MRP streams do not provide adequate timing or an appropriate mechanism for hydro power facilities. The IESO has identified that government policy may be required for nuclear and large hydro facilities. Government policy or a targeted program for small hydro should also be provided as the typical time frame for undertaking major upgrades or new builds exceeds the forward periods in the MRP. Furthermore, these assets provide a number of non-electricity benefits that serve a common good (i.e. flood control).
Resource Adequacy Engagement Plan	
What needs to be considered in future engagement phases to develop the details of the mechanisms in the framework?	As noted, the role that DER's will play and the mechanisms that will be implemented to promote and account for DER's in addressing resource adequacy. In addition, the

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	framework on specific programs targeting common good objectives such as small hydro, remote communities, indigenous participation, etc. should be developed.
What other areas need to be discussed with stakeholders to operationalize the framework?	As above.
What other areas need to be discussed with stakeholders to operationalize the framework?	As above.