

Feedback Form

Resource Adequacy webinar – April 22, 2021

Feedback Provided by:

Name: Allen Freifeld

Title: Counsel

Organization: Demand Power Group Inc.

Email: I have a question: The material presented on April 22nd indicates that the capacity auction participant must be the capacity market participant. And that wording has been included in the Manuals to clarify that the Capacity Auction Participant (CAP) will become the Capacity Market Participant (CMP) to ensure participants are aware that ownership requirements for physical resources will apply to CAPs as well. The revised Manual language indicates that *“Except in the case of a capacity import resource, the capacity market participant must be the registered owner, as described in “Market Manual 1.5: Market Registration Procedures”, of the registered facility associated with the capacity auction resource”*. The question is this: Does this language prohibit a resource owner from engaging another party to submit an offer and/or engage another party to manage interactions with the IESO? In other words, can a market participant that does not own a resource represent the resource in the market?

Date: April 29, 2021

Following the April 22, 2021 Resource Adequacy engagement webinar, the Independent Electricity System Operator (IESO) is welcoming feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by May 13, 2021. 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.

Feedback on draft market rule and manual amendments for 2021 Capacity Auction administrative enhancements

Draft Market Rule and Manual / Section	Feedback
Market manual (MM) 12 / Section (S) 3.2	If the rule does indeed mean that the resource owner cannot engage another party to represent it in the market, then the rule is counter-productive. It is not uncommon for a party to own a resource but to engage another party to manage IESO interactions for it. If the rules prohibit such arrangements, it will complicate decision making for potential owners of resources, and will act as a dis-incentive to deployment. There does not appear to be a good reason for prohibiting such arrangements.
MM 12 / S 4.1	
MM 12 / S 5.2	SEE ABOVE
MM 12 / S 5.3.3	
MM 12 / S 6	
MM 12 / S 8	
MM 5.5 / 1.6.26.3.5	
Market rule (MR) Ch. 2 / S 1.2.2.6	
MR Ch. 11	
MR Ch. 7 / S. 18.4.4	
General comments/feedback	

Draft scope for hourly demand response (HDR) baseline methodology review

Topic	Feedback
<u>Data</u> Is the proposed source data appropriate? Is the analysis timeframe appropriate?	
<u>Suitable Business Days</u>	

Topic	Feedback
<p>Is the proposed method for choosing proxy event days appropriate? Should additional types of days be excluded from the set of proxy event days?</p>	
<p><u>Baselines</u> Are there additional baselines that should be evaluated? Do stakeholders support the exclusion of regression-based baselines?</p>	
<p><u>Performance Assessment</u> Are the proposed evaluation principles of accuracy, integrity, and simplicity appropriate? Are the proposed statistical performance metrics to assess baseline accuracy appropriate?</p>	
<p>General comments/feedback</p>	

General Comments / Feedback