




Resource Adequacy webinar – April 22, 2021

Feedback Provided by:

Name: Michael Pohlod

Title: Senior Energy Markets Manager

Organization: Voltus Energy Canada Ltd.

Email: 

Date: May 5, 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	
MM 12 / S 4.1	
MM 12 / S 5.2	Voltus disagrees with the requirement that physical Demand Response resources can only be registered by the resource owner. The IESO currently allows the registration of Physical Resources under Virtual Aggregations and previously allowed physical assets to be registered as physical by aggregators. This rule change has created additional administrative burdens for physical demand response resources and aggregators, while producing no additional benefit to the system.
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?	While Voltus understands the potentially unique conditions in 2020 (ICI Freeze) and the relative shortage of data, it

<p>Is the analysis timeframe appropriate?</p>	<p>may still be worth assessing the accuracy of the methodologies for May and June 2020. May 2020 was quite hot and could provide insight into any potential biases created when a heat wave occurs early in the season; a phenomenon that can result in HDR resources having their IDAs capped. In addition, it may be worth using data, if available, from a cold Winter, as both winters within the time frame identified were relatively mild.</p>
<p><u>Suitable Business Days</u> 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>The proposed method is appropriate; however, Voltus would like to emphasize that a selection of event days should be chosen from throughout the season. This will enable analysis of if certain methodologies produce bias during certain weather conditions (I.E. A May or June Heat Wave, or an October Test.)</p>
<p><u>Baselines</u> Are there additional baselines that should be evaluated? Do stakeholders support the exclusion of regression-based baselines?</p>	<p>Voltus would like to add an option for consideration: assignment of a 5 of 10 baseline with IDA for weather-sensitive loads and a 5 of 10 baseline without IDA for non-weather-sensitive loads. It should also be noted that a separate methodology should be considered for non-dispatchable batch loads, which will not be properly modelled by either of these methods.</p> <p>Voltus supports 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>	<p>In general, Voltus takes issue with the broad application of a weather sensitive or a non-weather sensitive baseline methodology to heterogenous aggregations. This is because aggregations are composed of thermally-light (weather sensitive), thermally-heavy (non-weather</p>

sensitive), and batch loads. To this end, we believe that being able to assign baselines on a site-by-site basis provides a more accurate view of HDR performance. Without the ability to properly assign baseline methodologies, the accuracy of a given baseline methodology will be severely dependent on the specific contents of that aggregation.

General Comments / Feedback

Thank you for the on-going engagement on Resource Adequacy in the province. We are looking forward to the release of the AAR later this year and to further clarification on the IESO's Mid-Term Procurement Process. Voltus believes strongly in the capabilities of distributed energy resources and demand response in delivering energy, capacity and ancillary services and would like to ensure that the IESO is considering these resources as eligible for its Mid-Term Procurement.