

Feedback Form

Resource Adequacy webinar – May 28, 2021

Feedback Provided by:

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Following the May 28, 2021 Resource Adequacy engagement webinar, the Independent Electricity System Operator (IESO) is seeking 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 June 18, 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.

Resource Adequacy Information Guide

Topic	Feedback
Is there any important Resource Adequacy-related information not already considered in this guide?	The information guide appears to be helpful in identifying the various design components of the Resource Adequacy Framework. Capital Power's previous comments have identified concerns with the terms and eligibility requirements for various procurement mechanisms, available bridging mechanisms, opportunities to compete for contracts, the inadequacy of the Capacity Auction as a means of capacity procurement in Ontario, as well as the criteria applied to decisions to non-competitively procure resources. These concerns remain, but Capital Power is appreciative of the IESO's efforts to consolidate its framework into the proposed format.

Capacity Auction: Forward Guidance and Minimum Target Threshold

Topic	Feedback
Stakeholders are invited to provide general feedback on the proposed approach for forward guidance and minimum target threshold	Can the IESO confirm whether needs identified in forward guidance are at risk of being satisfied through non-competitive procurements? In other words, is the risk to forward guidance unforeseen changes in market fundamentals, or unforeseen changes in procurement decisions external to the Capacity Auction? Capital Power would like to understand how capacity market performance may be further impacted by unsolicited proposals, bilateral agreements, non-competitive procurements and competitive procurements for contracted supply and resource adequacy products.

Transition to Qualified Capacity/UCAP

Topic	Feedback
Will the initial qualified capacity proposals presented result in a UCAP value that is consistent with the qualified capacity design principles for the	No comments at this time.

Topic	Feedback
resource types considered? If not, what changes would you suggest? Please offer alternatives.	
Are the sources of data suggested as inputs into each UCAP formula appropriate? If not, please explain why and suggest alternatives.	No comments at this time.
Are there any incorrect assumptions the IESO has included that may not be appropriate?	No comments at this time.
Is there anything the IESO may not have considered that may contribute to the development of an accurate UCAP methodology?	UCAP values may need to consider fuel constraints that arise from an evolving supply mix, and/or policies regarding specific technology types.
General Comments/Feedback	Capital Power recommends that the IESO apply current and widely used methodologies for assessing capacity available from different types of resources. (e.g. Effective Load Carrying Capability.) This may be best further discussed in resource-specific meetings to be held with resource owners.

UCAP Resource-Specific Meetings

Topic	Feedback
<p>Please indicate your interest in participating in these meetings sooner than June 18, if possible.</p> <p>Are bi-weekly meetings appropriate? What should the format be? How should attendance be managed?</p>	Capital Power supports UCAP Resource -Specific Meetings.

General Comments / Feedback