

IESO Engagement

From: Justin Rangooni
Sent: July 9, 2021 1:26 PM
To: IESO Engagement
Subject: IESO Consultation on UCAP - Energy Storage Canada Feedback

Ryan,

On behalf of Energy Storage Canada, the following comments are provided in response to the UCAP Sessions held on June 28th, specifically the sessions on Dispatchable Storage and Demand Response.

- During both sessions, participants requested that the IESO provide additional data and analysis to support IESO's proposed UCAP definitions. Specifically, rationale to support the 4-hour delivery (e.g., the extent this is required per Ontario's load shape on peak-days) and rationale to support 5% EFORD.
- We support the suggestion that the 4-hour delivery duration for UCAP be changed to a length of time applicable to various procurement needs. For example, Capacity Auctions could have a duration requirements that are different that IESO RFPs that are design to meet specific identified needs.
- We understand that Ontario is still accumulating data that may inform future determination of UCAP; therefore, it is important to underscore that the IESO's definition for UCAP will be "temporary" until new data is available. Given this, the IESO should provide details of it's approach an methodology for future UCAP discussions. For example, what threshold of data would be required to "open up" the UCAP definition? How will proposals be "phased in" for future Capacity Auctions? What options will participants have to revise UCAP for there specific projects?
- With respect to HDR, ESC continues to question whether a derating capacity from the registered capacity (RCAP) is required. We suggest it would be feasible to accept UCAP=RCAP. Rather than focusing on derating RCAP, IESO should continue to apply applicable performance tests and an penalties to ensure that participants submit RCAP values that are consistent with their actual capabilities.

Please don't hesitate to follow-up with me if you have any further questions.

Sincerely,
Justin

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