

Feedback Form

Resource Adequacy – September 23, 2021

Feedback Provided by:

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Date: October 13, 2021

To promote transparency, feedback submitted will be posted on the Resource Adequacy webpage unless otherwise requested by the sender.

Following the September 23, 2021 Resource Adequacy webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the following discussed items. Background 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 14, 2021. If you wish to provide confidential feedback, please mark the document "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Capacity Auction

| Topic | Feedback |
|---|---|
| General comments and feedback on Next Steps and Timelines | AEMA is concerned about the uncertainty of when UCAP baselines will be generated and used. Can the IESO confirm that performance during the 2022/2023 capacity year will be used to calculate UCAP for the 2023/2024 Capacity year and that the performance factor for 22/23 will be 1? The UCAP methodology should not be finalized until after the HDR baselines and outage management issues are addressed |

HDR Baseline Methodology

| Topic | Feedback |
|--|---|
| Is there additional segmentation or sensitivity analysis the IESO should consider? | AEMA Supports the 15 of 20 BL methodology. AEMA members have provided individual contributor data for further analysis by the IESO team and looks forward to the IESO's assessment of resource-level baselines composed of individual contributor-level baselines. |
| Do stakeholders feel there is strong alignment between the results presented and the implications the IESO has identified? | AEMA does not believe there is alignment. AEMA believes the IESO is currently using the IDA to generate a pre-determined outcome (actual load) on non-dispatch days. Accuracy of a methodology on these days does not necessarily show the desired outcome. During a dispatch, sites are prone to unexpected outages, pre-cooling, ramp-downs, or charging behaviors during the IDA window, which can lead to dramatic baseline impacts and a reduction in baseline accuracy. |
| Are there additional implications the IESO has not considered based on the preliminary results? | Click or tap here to enter text. |

| Topic | Feedback |
|-------------------------------|--|
| General comments and feedback | The IESO stated the baseline should be an accurate indication of the load on any day in the absence of an activation. AEMA does not agree with this concept on non-standby days. On days when the resources are not on standby, there is no incentive to maintain a high load and if a load does decrease consumption that will be reflected in the forward-looking baseline. Counting a low load, non-standby day twice will result in inappropriate measurement. AEMA believes the 15 of 20 methodology baseline already captures the low load days. |

Medium-Term RFP

| Topic | Feedback |
|--|---|
| What questions or feedback do you have on the Medium-Term RFP proposed design consideration on Contract Design Considerations | Click or tap here to enter text. |
| What questions or feedback do you have on the Medium-Term RFP proposed design consideration on Performance Obligations | |
| What questions or feedback do you have on the Medium-Term RFP proposed design consideration on Rated Criteria | Click or tap here to enter text. |
| What questions or feedback do you have regarding considerations for Uprates that may be eligible in the Medium-Term RFP | Click or tap here to enter text. |
| What questions or feedback do you have on the Medium-Term RFP UCAP approach | Medium Term RFP UCAP (and performance assessment) should be comparable to the Capacity Auction. |
| I am a General comments and feedback | This RFP should be open to all resource types. (technology-agnostic). |

General Comments/Feedback

AEMA is a North American trade association whose members include distributed energy resources ("DER"), demand response ("DR"), and advanced energy management service and technology providers, as well as some of Ontario's largest consumer resources, who support advanced energy management solutions due to the electricity cost savings those solutions provide to their businesses. These comments represent the views of AEMA as an organization, not any individual company.