

Feedback Form

Resource Adequacy – September 23, 2021

Feedback Provided by:

Name: Michael Pohlod

Title: Senior Energy Markets Manager

Organization: Voltus Energy Canada Ltd.

Email: [REDACTED]

Date: 10/13/2021

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	Voltus understands the IESO intends to transition to UCAP for enabled resources in the December 2022 auction. Voltus believes that at least one capacity years' advance notice is needed to prepare for the change. Voltus would like to confirm that the performance in 22/23 will be used to set UCAP in 23/24 and that capacity in 22/23 will be assessed at the ICAP value of the DR resource. In addition, Voltus suggests that UCAP/performance not be finalized until questions revolving around IDAF and outage management are reasonably addressed. This may require delaying roll-out of UCAP by an additional capacity year.

HDR Baseline Methodology

Topic	Feedback
Is there additional segmentation or sensitivity analysis the IESO should consider?	<p>In general, Voltus supports a transition to High 5 of 10 baselines. These better align with the direction of other ISOs and provide more accurate assessments of DR performance particularly in shoulder seasons. This is relevant in the IESO as tests tend to be conducted during the shoulder season. At present, this can lead to baselines being understated in the first test of the year and overstated in the second test. Voltus generally supports the High 15 of 20 baseline methodology and has worked alongside the AEMA to provide the IESO with individual contributor data for further analysis by the IESO. We are hopeful that access to this level of data is the first step for the IESO in transitioning to a Contributor-level baseline methodology. Where Resource-level baselines are constructed through the stacking of Contributor-level baselines. Voltus believes that this approach will assist the IESO in its efforts to assess UCAP properly, as well as to store UCAP derates at the appropriate level (the contributor level).</p>

Topic	Feedback
<p>Do stakeholders feel there is strong alignment between the results presented and the implications the IESO has identified?</p>	<p>Voltus would like to caution the IESO in solely using non-dispatch days to assess baseline accuracy. This methodology can be troublesome as actual behavior during dispatches can often include ramp downs, pre-cooling and battery charging. These actions can lead to dramatically over or under-inflated baselines with poor accuracy. Voltus takes exception to the IESO's conclusion that small changes to the accuracy of the baselines should be discounted due to the infrequency of activations. Voltus and its customers are routinely dispatched in other markets and hope that the IESO's markets continue to develop in a manner that enables more frequent dispatches for resources and contributors that are able and economic. To this end, a viable baselining methodology should be sought that will help the IESO better assess DR resources long-term. Voltus again contends that this is a resource baseline composed of the sum of contributor-level baselines.</p>

Topic	Feedback
<p>Are there additional implications the IESO has not considered based on the preliminary results?</p>	<ul style="list-style-type: none"> • 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 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. • Additionally, Voltus believes that contributor level data should be a key consideration. Measuring baselines only at the portfolio level minimizes the accuracy of performance assessments as it fails to capture the true value of each contributor. Moreover, each contributor should be able to schedule outages, with the resource reducing its offer into market accordingly, without risking an outsized impact to the entire resource's baseline. • Voltus suggests that the current performance/penalty scheme be revisited to ensure that aggregations can meet future obligations. Resource-level de-rates wrongly incentivize contributors to switch aggregators without penalty, to the detriment of the Ontario grid.

Topic	Feedback
General comments and feedback	<p>Voltus does not accept the IESO's findings which determined that the IDAF opt-out would no longer be considered and believes that this should be reassessed at the contributor level. Voltus has seen in its extensive experience that some contributors are best assessed using a non-adjusted methodology. Voltus hopes that the IESO, in its next assessment, will include a look at the contributor-level baseline accuracy using an opt-out for thermally heavy contributors. In addition, Voltus looks forward to working with the IESO to help develop understanding on the current impact of large contributors on resource level IDAs and believes that this implication of key finding #2 provides further support for a resource baseline composed of the sum of contributor-level baselines with potential caps based on capacity contribution.</p>

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	Voltus seeks clarification as to whether the Medium-Term RFP aligns with the performance requirement of the Capacity Auction.
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.

Topic	Feedback
What questions or feedback do you have on the Medium-Term RFP UCAP approach	The proposal for UCAP limits the measurement of dispatchable loads to the top 200 hours. However, the must-offer requirement as outlined in the Medium-Term RFP suggests that these resources will be providing more. Voltus asks if there is a way for dispatchable loads to get measured in more hours such that it would be comparable with the Medium-Term RFP.
General comments and feedback	

General Comments/Feedback

Click or tap here to enter text.