

Feedback Form

Resource Adequacy – October 21, 2021

Feedback Provided by:

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Date: November 16, 2021

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

Following the October 21, 2021 Resource Adequacy webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the following discussed items including the Capacity Auction, Medium and Long Term RFP. 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 November 12, 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
Introduction	<p>Apologies for providing these comments beyond the identified deadline and appreciate the IESO's acceptance of these comments. Overall, EnPowered agrees and fully supports the comments of the AEMA. The stakeholding of the proposed changes seems to have been undertaken in an expedited manner which is worrisome.</p>
Enhancement #1: Capacity Qualification	<p>In its meeting on October 21, 2021, the IESO proposed the utilization of performance during the summer 2021 to inform UCAP for resources in the December 2022 auction. That action would violate the IESO's own stated practice of not applying rule changes retroactively. Additionally, it would counter what the IESO has stated in that aggregators are in the best position to manage the risks associated with HDR – aggregators, or anyone else, are unable to manage a risk, contractually or otherwise, after-the-fact. Any derating should be based on performance in period after applicable market rules changes have been introduced and approved.</p>
Enhancement #2 Performance Assessment Modifications	<p>The surprising introduction of an emergency capacity charge, at the October 21 meeting for the first time, seems to involve both the removal of a carrot while introducing a stick. Recently, the IESO introduced changes to limit activation payments to the contractual amount for HDR resources. That removed the 'carrot' to provide whatever MWs HDR resources can during an emergency situation, when the power system is in dire needs of MWs. This latest addition represents a new 'stick' to whack HDR resources if they don't perform to contract. Together, this does not seem to incent proper behaviours and is overly punitive. Additionally, the measurement of this penalty will be against the contracted ICAP MWs with no ability for HDR resources to have outages or derates. This treatment seems inconsistent with the treatment of generators and their associated capacity payments.</p>
Enhancement #3 Expand Participation to Generator-Backed Capacity Imports	<p>Click or tap here to enter text.</p>

Topic	Feedback
Other General Comments or feedback on the 2022 Capacity Auction Enhancements Design Document	Click or tap here to enter text.

Medium Term RFP

Topic	Feedback
Feedback on the draft schedule	Click or tap here to enter text.
Feedback on the extension to the commitment term	Click or tap here to enter text.
General comments and feedback	Click or tap here to enter text.

Long Term RFP

Topic	Feedback
General comments and feedback	Click or tap here to enter text.

General Resource Adequacy Comments/Feedback

Click or tap here to enter text.