

Feedback Form

Resource Adequacy – October 21, 2021

Feedback Provided by:

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Date: November 12, 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	Rodan supports the comments filed in this engagement by the Advanced Energy Management Alliance (AEMA) in their entirety and provides these additional comments.
Enhancement #1: Capacity Qualification	Rodan believes the IESO should conduct focused meetings to discuss additional options for QC for HDR resources. The current proposal has not been properly stakeholdered. The use of the Intraday Adjustment (IDA) continues to be an issue that should be discussed further with stakeholders.
Enhancement #2 Performance Assessment Modifications	Rodan believes the "Emergency Capacity Charge" based on ICAP is unacceptable without an ability to derate the resource to account for contributor outages. This would be more aligned with the way generators are treated.
Enhancement #3 Expand Participation to Generator-Backed Capacity Imports	Click or tap here to enter text.
Other General Comments or feedback on the 2022 Capacity Auction Enhancements Design Document	Rodan believes the multitude of issues facing the HDR resource warrants focused engagement between the IESO and the affected participants to deal with these issues in a "bundled" approach.

Medium Term RFP

Topic	Feedback
Feedback on the draft schedule	

Feedback on the extension to the commitment term	Click or tap here to enter text.
General comments and feedback	Rodan continues to urge the IESO to allow Demand Response resources to participate the Medium Term RFP. This participation will provide additional competition and reduced costs for ratepayers

Long Term RFP

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

General Resource Adequacy Comments/Feedback

Rodan Energy strives to create and deliver intelligent energy solutions to large consumers, distributors, and power producers. With our expertise in metering, Demand Response, energy analytics, and systems engineering, we enable our clients to reduce their total energy spend, enhance power system reliability, and help develop a sustainable energy future.

Rodan has repeatedly made compelling arguments against the timing of the proposed Capacity Auction changes, the failure to value loss factors, and more. These comments come from extensive experience in Ontario as well as in other markets that have implemented mechanisms like UCAP. We have seen the benefits of UCAP when done right, and the pitfalls when it is not implemented well.

Rodan wishes to reiterate its previous comments that “The UCAP methodology should not be finalized until after the HDR baselines and outage management issues are addressed” which we filed on October 13th. The issue of measurement is one that the Rodan has been raising in many engagements but do not feel it’s been adequately addressed.

Rodan would also like to acknowledge that detailed engagement on the UCAP methodology, including whether or not the Summer 2021 season would drive Performance Factors did not start until the engagement on October 21st, 2021 (At the very end of the summer season). This did not allow for aggregations to properly manage the risks of such penalties going into the 2021 season. Moreover, it is still unclear if UCAP will be applied to this year’s auction as the IESO continues to say that UCAP will be implemented for the December 2022 auction. If this is the case, then Rodan is concerned that Performance factors will be used from this past summer (Summer 2021), instead of next Summer, a performance period occurring after the announcement.

Rodan looks forward, to the IESO’s review of baseline methodology, that was conducted with aggregator-provided data.