

# Feedback Form

## 2022 Capacity Auction Enhancements - Implementation – December 15, 2021

### Feedback Provided by:

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Date: January 10, 2022

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

- Following the December 15, 2021 Resource Adequacy webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the following items: **Capacity Auction proposed Market Rule amendments and draft Market Manuals for the 2022 Capacity Auction**
- 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](mailto:engagement@ieso.ca) by January 7, 2022.** 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.

## Market Rules

Market Rule Chapter	Title	Sub-section	Feedback
Ch. 7	System Operations and Physical Markets		AEMA will not comment on the Market Rule Amendments until IESO responds to the comments submitted on December 15th. As noted in comments, AEMA does not support testing to verify a cleared ICAP.
Ch. 9	Settlements and Billing		AEMA will not comment on the Market Rule Amendments until IESO responds to the comments submitted on December 15th. As noted in comments, AEMA does not support an availability charge of ten (10) times the availability charge determined under section 4.7J.2.1 for every hour of the availability window it fails to submit a demand response energy bids in the amount of their capacity obligation in either the day ahead commitment process through to pre-dispatch or in the real time markets.
Ch. 11	Definitions		AEMA will not comment on the Market Rule Amendments until IESO responds to the comments submitted on December 15th. AEMA does not support the inclusion of new definitions for proposals that have not completed a full stakeholder engagement.

## Market Manuals

Market Manual	Title	Sub-section	Feedback
12	Capacity Auctions		<p>2.2 AEMA does not agree with the removal of 'no less than 2 months' for the publication of the pre-auction report. Please advise where the timelines for this report are located. AEMA supports the Pre-Auction report being published no less than two months prior to the start of the capacity qualification process for the capacity auction. At this time, AEMA members are unable to comment on items relating to UCAP/ICAP until IESO responds to comments submitted on December 15th. 3.3 AEMA are unable to comment on items in this section until IESO responds to comments submitted on December 15th. 5.3 AEMA members are unable to comment on this section until IESO responds to comments submitted on December 15th.</p>
4.2	Submission of Dispatch Data in the Real Time Energy and Operating Reserve Markets		Click or tap here to enter text.
4.3	Real Time Scheduling of the Physical Markets		Click or tap here to enter text.

Market Manual	Title	Sub-section	Feedback
5.5	Physical Markets Settlement Statements		1.6.26.3 At this time AEMA members are unable to comment on items relating to Non-Performance charges until IESO responds to comments submitted on December 15th. 1.6.26.3.2A – AEMA supports the true-up payments based on the quantity of auction capacity in excess of their capacity obligation made available during applicable hours of day-head through to the last hour of pre-dispatch and real-time. 1.6.26.3.2B AEMA members are unable to comment on items relating to Augmented Availability Charge until IESO responds to comments submitted on December 15th. 1.6.26.3.5 AEMA members are unable to comment on items relating to assessment for HDR resources that fail to deliver their DR capacity up to cleared ICAP and the 10% dead band of the cleared ICAP.
	IESO Charge Types and Equations		Click or tap here to enter text.
7.3	Outage Management		Click or tap here to enter text.

## General Comments/Feedback

AEMA was quite disappointed that amendments to Market Rules and Market Manuals were posted in advance of the IESO reviewing comments from the November stakeholder engagement day meetings. This included the inclusion of two new concepts that were introduced at the November meetings – performance charges equaling 10 times and the introduction of a capacity check test. The IESO moved forward with little regard for the opinions of stakeholders including those who will be impacted by the proposed changes, and those who understand the need for proper governance processes to exist. AEMA members understand the need to move forward to ensure that Market Rules and processes are in place in advance of the next round of procurements including the Capacity Auction, however the credibility of stakeholdering should not be sacrificed. If time is needed to ensure that the proper constructs are enabled that that time should be taken – stakeholdering should not be cut short. The Resource Adequacy Framework has been set up to enable the procurement of resources for the future of Ontario, scrambling to bring in a set of rules or proposed changes at the 'last minute' should not be the norm.

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.