

# Feedback Form

## IESO Reliability Standards Review – December 14, 2020

### Feedback Provided by:

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Following the December 14, 2020 webinar on IESO Reliability Standards, the IESO is seeking feedback from participants on the proposed methodology and approach outlined in the presentation with respect to intertie support (non-firm imports). The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the December 14, 2020 entry on the [Reliability Standards Review webpage](#).

**Please provide feedback by January 18, 2021 to [engagement@ieso.ca](mailto:engagement@ieso.ca).** Please use subject: *Feedback: Reliability Standards Review*. To promote transparency, this feedback will be posted on the [Reliability Standards Review webpage](#) unless otherwise requested by the sender.

Thank you for your time.

## Intertie Support (Non-Firm Imports)

Topic	Feedback
Have the areas of consideration been appropriately included in the proposed methodology?	
Are the approaches outlined reasonable for forecasting real-time market imports?	<p>To evaluate how imports are likely to flow under tight supply conditions/prices, the IESO is recommending using the 90th percentile dependable values over the top 5% of HOEP hours as proxy.</p> <p>Evolugen recommends replacing the top 5% of HOEP hours by the associated shadow prices, as shadow prices better reflect market signals, in particular with respect to determining whether an intertie transaction is economical or not. In addition, the use of shadow prices would allow a better transition to the implementation of LMP in the future.</p> <p>A high HOEP signals a mismatch between RT supply and demand, but not necessarily resource adequacy. In addition, if the top 5% of HOEP hours were signaled later than two hours pre-dispatch, then market participants would not be able to react to price signals and support the IESO's needs.</p> <p>If the largest RT price spikes are happening within the mandatory window, then whether imports flowed during the price spikes or not is irrelevant, because such intertie trades were already scheduled before the market signaled a resource adequacy need.</p>

## General Comments/Feedback

Evolugen generally supports comments from APPrO in relation to this consultation.