

IESO York Region Non-Wires Alternatives Demonstration Project Feedback Form

July 23, 2020

<u>Date Submitted:</u> <i>2020/08/13</i>	<u>Feedback Provided By:</u> Company Name: Enel X Contact Name: Sarah Griffiths Contact Email: [REDACTED]
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Following the July 23, 2020 webinar to discuss the IESO York Region Non-Wires Alternatives Demonstration Project, the IESO is seeking feedback from participants on the Draft Demonstration Project Rules. Please provide your feedback in Table 1 below. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage. The referenced presentation and associated Draft Demonstration Project Rules can be found under the July 23, 2020 entry on the IESO York Region NWA Demonstration Project [webpage](#).

The IESO is also seeking more information about your organization. Please complete the applicable sections in Table 2 below. Please note the IESO will not post the information you submit in Table 2.

Please provide feedback by August 13, 2020 to engagement@ieso.ca. Please use subject: *Feedback: York Region NWA Demo*. To promote transparency, feedback submitted in Table 1 below will be posted on the IESO York Region NWA Demonstration Project [webpage](#) unless otherwise requested by the sender.

Thank you for your time.

Table 1

Topic	Feedback
<p><i>Do the proposed dates present any challenges?</i></p>	<p>Interconnection Timelines:</p> <p>As noted in previous comments submitted by Enel X (April 23rd), the timelines are reasonable for an established Demand Response C&I customers.</p> <p>The proposed timelines may not enable new resources that require capital expenditures due to the current utility CIA timelines and process. Enel X was pleased to hear a positive tone on the July 23rd Webinar to the suggestion of assistance by Alectra for projects that need to go through this process. However, in the “IESO Response to July 23, 2020 Webinar Questions”, the response states that “Preference will not be awarded to participants in the Demonstration Project.” Enel recognizes that connection assessments are occurring that are not related to the Demonstration Pilot, however to fit within the timelines established by the IESO and Alectra, recognition should be made to enable the participation of resources that are required to go through the connection process. Since this is a Demonstration Project, it would be unfortunate if new resources were penalized from participating and demonstrating their value as a NWA to the IESO and Alectra, as well as the stakeholder and regulatory community that will be using the results of the project for further investment in programs and markets.</p>
<p><i>General feedback on the Draft Demonstration Project Rules</i></p> <p>(please include the specific section of the Rules being referenced)</p>	<p>2.4 DER Eligibility</p> <p>Enel X requests confirmation on how a customer would participate as a direct participant or as part of an aggregation, where the asset is owned by a third party located at behind the meter at a customer site.</p>

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	<p>- 2.1 unable to participate as not the end-use customer (with an account number)</p> <p>- 2.2 unable to participate as not directly connected to the DSO’s system</p> <p>- 2.3 unable to participate as the asset is not owned by the contributor (therefore not a ‘contributor DER’ so unable to aggregate the asset)</p> <p>- 2.4 unable to participate as the asset is not owned by the contributor</p> <p>The DER participation model that Enel X operates under in Ontario is not unique to Enel X nor to Ontario. The model is a standard participation model throughout electricity markets and should be included in any electricity markets (wholesale and distribution level).</p> <p><i>2.4.1 b) ...be in respect of a single Aggregator Resource Category</i></p> <p>Please explain the reasoning behind the inability to aggregate different resource types?</p> <p>5.10.2 Form of Contract</p> <p>Please advise when a copy of the Contract will be available for comment. Although the contract is assumed to be based on the rules outlined in the Demonstration Project Rules, it will be efficient for a review of the contract in advance of registration for the LCA.</p> <p>6.3 Local Energy Auction Format</p>

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	<p data-bbox="779 241 1850 318"><i>“... there will be an maximum of ten (10) Activation Days during the Commitment Period”.</i></p> <p data-bbox="779 345 1461 375">Will there be a minimum number of activations?</p> <p data-bbox="779 464 1079 493">6.4 Bid/Offer Format</p> <p data-bbox="779 521 1913 683">Please confirm if there are any differences in the way C&I DR resources and gas-fired generators or storage resoruces price-quantity pairs other than C&I DR will submit monotically decreasing pairs and generators/storage will submit monotically increasing price quantity pairs.</p> <p data-bbox="779 773 1577 802">6.5 Maximum Energy Price and Minimum Energy Price</p> <p data-bbox="779 829 1839 906"><i>d) “The bid price will not be less than the Minimum Energy Price and must not be greater than the Maximum Energy Price as specified in the Pre-Auction Report”.</i></p> <p data-bbox="779 933 1923 1133">Will the maximum energy price follow the wholesale market? It is difficult to comment on this section as part of the rules, if the Max Energy Price will not be published until the Pre-Auction Report. The Maximum Energy Price will provide insight into the ability to plan a portfolio for participation in a commitment period.</p> <p data-bbox="779 1222 1079 1252">6.10 Test Activations</p> <p data-bbox="779 1279 1923 1356"><i>“A contracted DER may be tested for up to four consecutive hours and will be expected to follow their activations for the entire duration of the test”.</i></p>

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	<p>Please include a definition of what constitutes a failed Test Activation.</p> <p>7.3 Test Activation Payments</p> <p>“...which rate is established by the DSO in its discretion and subject to change”.</p> <p>Please clarify how, why and when a DSO may “at its discretion” change the Test Activation rate of \$0.25/kWh.</p> <p>9 Demonstration Review and Amendment</p> <p>Please clarify “...shall not affect any executed Contracts”. Does this section imply that changes will be made to the program for the next commitment period/ next set of Contracts?</p>

General Comments/Feedback:

Enel continues to support the IESO and Alectra with the NWA York Region Demonstration Project. Enel participates in similar markets and programs across North America, with success and positive results for the system operator, the distributor, the participant and the ratepayer. This Demonstration Project is laying the groundwork for finding efficiencies and savings through the use of markets at the local level, and realizing the value of DERs throughout the region.

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