

Demand Response Working Group – *Feedback Form*

Meeting Date: November 12, 2019

<u>Date Submitted:</u> 2019/12/10	<u>Feedback Provided By:</u> Organization: Electricity Distributors Association (EDA) Main Contact: Lynn Williams Email: [REDACTED]
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Following the November 12, 2019 meeting of the Demand Response Working Group (DRWG), the Independent Electricity System Operator (IESO) is seeking feedback from participants on the following items discussed during the meeting. The presentation can be accessed from the [DRWG webpage](#).

Please submit feedback to engagement@ieso.ca by December 10, 2019. To promote transparency, this feedback will be posted on the engagement webpage unless otherwise requested by the sender.

Stakeholder Feedback Table

Table 1: HDR Meter Data Authentication

Requests	Stakeholder Feedback
What other proven methods are there to authenticate meter data back to the LDC meter? If possible, please provide details on methods used in other jurisdictions.	The EDA submits that data recorded using current revenue grade meters is understood to be of the highest quality. The EDA seeks further information as to authenticating such quality data.

Table 2: In-day Adjustment Factor (IDAF)

Requests	Stakeholder Feedback
Please provide details and examples wherein the IDAF is more/less accurate for C&I HDR baselines. What are the key factors to consider that lead to those increases/decreases in accuracy?	The EDA submits that the IDAF requires further stakeholdering and analysis. The EDA notes that this factor is presently used to compute the Capacity Based Demand Response (CBDR) baseline. The EDA is not aware of any current issues of computing the CBDR baseline.
Is there data that can be shared?	
Please provide any details on baseline methodologies and in-day adjustment factors used in other jurisdictions.	

Table 3: Proposed 2020 DRWG Work Plan

Requests	Stakeholder Feedback
<p>What other initiatives should be considered for inclusion in the 2020 work plan?</p> <p>Please specify whether you see this as a separate issue or a sub-component of another initiative.</p>	<p>The EDA supports the topics that the IESO has identified (i.e., in-day adjustment methodology, baseline methodology, explore barriers to residential DR) and proposed that operations coordination and system plan issued be included.</p> <p>As LDCs begin to explore non-wires alternatives (NWAs) for meeting distribution system needs, the EDA recommends that DRWG 2020 work plan include preliminary coordination requirements and options for local DR (i.e., DR resources used by the LDC to meet distribution system needs) and global DR (i.e., DR resources participating in IESO DR programs) and proposed that:</p> <ul style="list-style-type: none"> • For example, can the same DR resource offer services to both the LDC and IESO? If so, is there any priority of service offer required? (normal, emergencies) • How should LDCs and the IESO coordinate activations of DR resources? • Can integrated solutions be created (e.g., the LDC procures DR resources and then uses those DR resources to participate in the IESO market in addition to meeting their own needs?) • If LDCs invest to facilitate DRs who pays – if local versus global <p>In addition to the coordination between global and local DR, the IESO should consider review of DR potential in regional planning. Demand-side resources continue to evolve and the DRWG may be a suitable forum to consider how best to identify DR potential and integrate into the planning process.</p>
<p>Please provide feedback on the impact that the underlying issues and opportunities of each of the proposed initiatives could have on DR resources. This will help the IESO identify priority of the initiatives.</p>	<p>Impacts of the proposed initiatives include:</p> <ul style="list-style-type: none"> • Increased opportunities for customer participation • Improving the alignment of DR within LDC and IESO plans (from bulk system down to local level) • Aligning the EDA’s Power to Connect vision paper with IESO’s Innovation Roadmap

General Comments:

The EDA's Power to Connect roadmap outlines how distributed energy resources (DERs), including DR, can play an integral role in distribution system planning. Many non-wires projects that have been developed in other jurisdictions include a role for DR resources. Therefore, in addition to coordinating DR for the purposes of meeting overall bulk system resource adequacy, we believe the DRWG should also consider alignment with LDC planning and operations.