Market and Planning Data Questionnaire

Feedback Provided by:

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Building on the ISO jurisdictional scan, the Independent Electricity System Operator (IESO) will initiate this engagement by presenting specific questions to participants.

Please submit feedback to engagement@ieso.ca **by January 15, 2024**. If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential." Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Topic	Feedback
What organization/stakeholder group do you represent and what is your key interest in this engagement?	Energy Storage Canada (ESC) is the voice of the end-to-end value chain of the country's energy storage sector, representing more than 85 members, with the highest concentration in Ontario. Our diverse membership ranges from DER developers to over a dozen utilities, including the province's four largest LDCs. Our members include many of the successful E-LT RFP contract award winners as well as storage operators across the country.

Topic	Feedback
Can you comment on the type or types of Planning and/or Market data that you access from the IESO? Do you have any feedback for the IESO about the Planning and/or Market data that is currently made available to stakeholders?	For both the performance of existing energy storage resources (ESRs) and development of future ESR assets, our members make exhaustive use of effectively all planning and market data made available by the IESO to provide value to customers, support operation of the grid, and to help deliver upon the IESO's long-term plans for the province's energy strategy. This includes, but is not limited to: prices, offers, bids, generation and demand at the provincial, regional and local level, as well as forecasts of the above as well as impact assessments, project review processes, etc.

Topic	Feedback
What additional Planning and/or Market data is your organization seeking to access? If possible, provide the data sets of interest including specifics details in terms of granularity, format, etc.	We strongly encourage the IESO to expand the availability of, and access to, planning and market information, under the IESO's purview. We would highlight three data sets in particular: First, in determining operating strategies, ESRs assess the potential real-time energy costs and revenue based on the market price outcomes. However, the IESO does not publish data for historic energy offer stacks and energy bid stacks to allow ESRs to assess their impact on market price outcomes. This information would be invaluable to optimizing operating strategy for energy storage resources. As noted in the PA Consulting's jurisdiction review, the IESO is the only market reviewed that does not publish offer and bid data historically. We would suggest the AESO's approach as particularly effective. Second, we recommend that the IESO should be publishing hourly consumption data by transmission station (or small subregions). LDCs should similarly be encouraged to provide hourly consumption data at their transformation stations and feeders. Information as to asset age and forward planning on expected maintenance/upgrade schedules should also be disclosed well in advance. This information can help ESRs in developing sites where the power system has growing needs and will greatly influence the design of the ESRs to meet each area's unique needs. Further, hourly data by transmission station and/or feeder allows ESRs to better construct a view of the power system to assess broader investment opportunities as well as provide much more detailed feedback and support to IESO planning activities. Third, the IESO should encourage operators of BTM assets to provide greater visibility and disclose performance information to their LDC and the IESO, especially as the policy evolves to enable DER market participation. This should include details as to any other commitments (i.e., the ICI), performance characteristics, historic usage patterns, and any other information that would help determine the asset's ability to contribute/provide grid services.

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Please elaborate on the need for and/or your intended use of the data. (e.g., use cases, etc.)	For data on expected price impact from dispatch, this information would be important in determining whether the existing supply stack is steep (and an ESR dispatch could sharply decrease or increase the market price, and therefore the operating strategy should be adjusted), or the stack is flat (where a dispatch would result in minimal price reduction, and thereby is optimal to dispatch). Without this information, ESR operators face heightened uncertainty and may unnecessarily increase offer prices or reduce planned capital investments. On publishing hourly consumption data at the transformer/feeder level and asset replacement, this information would be invaluable to ESR/DER proponents in determining optimal locations for asset placement and offering NWA solutions to LDCs, respectively, and improving overall market transparency. On increasing BTM DER visibility, greater information flow is essential to inform LDCs in developing DERMs, procuring DER provision of grid services, allowing additional grid connections, and enhancing trust between market participants.
If applicable, is there specific Planning and/or Market data that is currently not made available by the IESO that should continue to remain private or confidential? Please tell us the impact on your organization if such data is made available.	We encourage the IESO to adopt a maximalist approach to data disclosure and system transparency. Where there are substantive concerns over customer confidentiality and privacy, we would encourage the IESO to first pursue options to anonymize sensitive information, and only when such options are unavailable to resort to withholding data. The IESO is implementing a close to a quarter of a billion-dollar project through the Market Renewal Program to enhance the market design. A core principle of functioning markets is the access to information for all market participants to make informed decisions and to identify market inefficiencies. If the IESO does not commit to greater market and planning data disclosure and publication, the benefits of MRP will be greater diminished if not eliminated.

General Comments/Feedback

As the Ontario energy market continues its transformation, the entry of new market participants and evolution of incumbents will be essential to digitise, decarbonise, and democratise our power grid, through the use of energy storage, DERs, smart grid management, and other innovative technologies.

The opportunity to deliver these new and enhanced services depends overwhelmingly upon the availability of and access to an expanded array of market and planning data. We strongly encourage IESO and OEB to collaborate in ensuring that their internal processes, as well as their oversights of regulated market participants, are promptly reformed to relieve any undue restrictions to data access.

Further, we recognise that, in some circumstances, making certain data sets be publicly available may incur marginal operational and/or capital costs. In such cases, we encourage the IESO/OEB to review these cases within their complete context, recognising that the incurrence of marginal costs will in most bases be outweighed in the medium and long-term by greater system performance and costs savings through the improvement enablement of NWAs, smart grid management, and CDM, as well as reducing emissions in line with the *Pathways to Decarbonisation* strategy.