

# Feedback Form

## Capacity Auction Enhancements – November 22, 2023

### Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the [Capacity Auction Enhancements](#) web page unless otherwise requested by the sender.

Following the November 22, 2023, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback on performance results and key observations from the summer activations, and the technical session discussion. The webinar presentation and recording can be accessed from the [engagement webpage](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by December 8, 2023.** 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.

## 1) Performance Results and Key Observations from the Summer Activations

Topic	Stakeholder Feedback
Do stakeholders have any questions or comments about the performance results or key observations presented?	

## 2) Additional Questions from the IESO

### D) Capacity Auction testing

Question	Stakeholder Response
How are the costs of responding to dispatch tests worked into your auction offers?	
Would cost savings on testing directly lead to lower offer prices?	
What other mechanisms could ensure compliance with IESO dispatch instructions?	

### H) More flexibility to manage commitments

Question	Stakeholder Response
Is there any additional information that the IESO can provide to help facilitate bi-lateral transfers?	
Can participants provide more details on their typical timelines for firming up obligation amounts, whether it be in the forward period or during the obligation period, if it were allowed?	

### I) Multiple HDR resources per zone

Question	Stakeholder Response
We would like to understand how aggregators would segment their contributors if multiple HDR resources in one zone were enabled. How would aggregators plan to segment their contributors?	
How would this improve resource performance and reliability?	
Why are inaccuracies introduced when different types/sizes of resources are combined under one resource?	

### **N) Avoided line losses credit in demand response capacity qualification**

Question	Stakeholder Response
What is the rationale for including an avoided line loss factor in capacity qualification if they are only achieved when demand response is activated?	

### **Other Questions/Comments**

Question	Stakeholder Feedback
Do stakeholders have any further questions or comments regarding the potential enhancements presented?	

### **General Comments/Feedback**

Evolugen by Brookfield Renewable appreciates the opportunity to provide comments.

We wish to reiterate our suggestions made to the September 20<sup>th</sup> engagement webinar, including:

- Allowing intermittent internal generators, with the proper qualifying mechanism, to participate in the capacity auctions. This would provide another venue for developers and facility owners to continue investing in both new and existing assets, and would be to the benefit of resource adequacy.

- Lowering dispatch test frequency and allowing for the flexible rescheduling of tests. Testing requires staff time and resources to execute, and such costs would be reflected in participants' offer prices.
- Enabling the transfer of capacity obligations between participants (e.g., monthly rebalancing auctions and direct bilateral transfers between market participants). The flexibility to both take on and shed obligations would increase auction participation.
- And most importantly, we recommend that the IESO align how its Market Manual qualification processes treat internal and external generators, so that internal generator facilities can offer a portion of their non-contracted, merchant capacity in the IESO auctions. This change would increase auction supply, align the IESO's own qualification rules, and align the IESO's rules with those of neighbor ISOs. We welcome discussions with the IESO on this point.