

Feedback Form

IESO Market and Planning Data Engagement— March 21, 2024

Feedback Provided by: April 4, 2024

Name: Alex Simakov

Title: Director of External Affairs

Organization: Energy Storage Canada (ESC)

Email:

Date: April 4, 2024

Following the March 21, 2024 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by April 4, 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
<p>Do you have any further feedback to share regarding the availability of IESO's Market and Planning Data?</p>	<p>ESC is disappointed in the lack of leadership and commitment to evolution of the Ontario electricity market's transparency and competitiveness. The IESO's own jurisdictional scan demonstrated that all other RTOs/ISOs have moved forward with sharing more information about their markets including fixed (e.g., asset capabilities and operational limits) and variable (e.g., offer and bid data on an hourly basis) components. This information publication is critical to enhance market participation, inform public policy decisions and achieve affordability for ratepayers. As mentioned by another participant (i.e., Mark Rubenstein from SEC) during the stakeholder engagement, the IESO should be very wary of claims of commercial sensitivity of information. In a majority of instances, claims of commercial sensitivity are instead ways to enact and maintain barriers to market entry and protections for market share that greatly decrease the validity of the IESO-Administered market and harm the achievement of public policy objectives. ESC strongly recommends that the IESO take a leadership role in establishing open, transparent and functional access to market data and planning information to maximize the benefits the IESO's own Market Renewal Program enhancements, procurements and overall electricity market evolution.</p>

Topic	Feedback
<p>If there are specific data availability issues you believe have not been addressed, could you please provide detailed feedback on what you feel is missing?</p>	<p>Key issues for data availability that must be addressed immediately are: i) consistency in information made available over different timelines and studies. For example, regional and bulk planning does not always publish transmission system capability, generation capabilities and demand growth expectations. This must be addressed so that all stakeholders can have the same visibility into the Ontario power system and market; ii) a centralized, query-capable database structure for all already publicly available data and information and ability to expand to include new data and information that will be made available in the future. For example, to gather regional power system information a proponent must go and extract from locked PDF documents information from both the IESO (e.g., Scoping Assessment reports, Integrated Regional Resource Plans) over a number of years and search out Distribution System Plans (DSPs) and Regional Infrastructure Plans (RIPs) to access further information. This does not allow for fair and accessible data and information to the market and is a process that can be addressed quickly with greater benefit. Another example is access to shadow prices for nodes across the IESO-Administered Market. The data is difficult to extract from the IESO and comes in format that is very unusable without significant investment by proponents. A proper database would allow stakeholders to better understand the historic load, generation and price outcome across the Ontario electricity market; iii) a NDA or commercial structure to access potentially critical energy infrastructure information that is used in other jurisdictions to allow RTOs/ISOs to share important information with only known entities that should have access to that information. In particular this should be used for power system information, impact assessments, and system operational structure; iv) decoupling system information and analysis from procurements. In most cases the information published by the IESO is too late and too narrow to help with project development, operational efficiency gains and market analysis. The IESO should strive to update system information and market data on an ongoing basis, that is done to ensure the best visibility and openness of the IESO-Administered Market.</p>

General Comments/Feedback

There are many examples across North America where planning information and market data is available far beyond what is available in Ontario. One area is system maps and capacity information sharing. FERC Order 2023 has established the requirement to publish heat maps on capacity for new resource connections based on existing system capabilities and the IESO should immediately explore options to achieve similar. We would also point very favourably towards the AESO's Transmission Capability Map as an existing resource that the IESO should look to adopt for Ontario (<https://www.aeso.ca/grid/connecting-to-the-grid/transmission-capability-map/>). Overall, with power system needs growing rapidly and public policy objectives evolving, the IESO must recognize and take on the leadership role it has in ensure fair, equitable and open access to information and data that underpin stakeholder analysis, investment and ultimately social acceptance of critical electricity infrastructure in Ontario.