

IESO York Region Non-Wires Alternatives (NWA) Demonstration Project and Innovation and Sector Evolution White Papers – Feedback Form

Webinar Date: December 12, 2019

Date Submitted: YYYY/MM/DD

Feedback Provided By:

Company Name: Energy Storage Canada

Contact Name: Justin Wahid Rangooni, Executive Director

Contact Email: [REDACTED]

Following the December 12, 2019 public webinar outlining the concept design of the IESO York Region NWA Demonstration project and the white papers on NWA Markets and Transmission-Distribution Interoperability, the IESO is seeking feedback from participants on the draft white papers and specifically on the design of the demonstration project.

Feedback received will be considered in order to shape the design for the demonstration project, including processes, timelines, resource eligibility, and service agreement of the demonstration. The IESO will work to consider and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation and white papers can be found under the December 12, 2019 entry on the [Innovation and Sector Evolution White Paper Series Engagement Webpage](#).

Please provide feedback by January 10, 2020 to engagement@ieso.ca. Please use subject: *Feedback: IESO York Region NWA Demonstration Project*. To promote transparency, this feedback will be posted on the [Innovation and Sector Evolution White Paper engagement page](#) unless otherwise requested by the sender.

Thank you for your time.

IESO York Region NWA Demonstration Project and Innovation and Sector Evolution White Papers – Feedback Form

Topic	Question	Feedback
Concept Design of York Region NWA Demonstration Project	How can participation in the demonstration auction be maximized?	
	What are challenges/opportunities to the adopted T-D model?	While it is important to simulate the results and benefit to the wholesale market prior to full implementation, the simulation period should move to integration with the wholesale market as soon as practical. This would permit the expansion of the demonstration project to other regions in a timely fashion thereby advancing the benefits of the reduced barriers to all the rate payers.
	Are demonstration timelines reasonable?	
	Are the proposed eligibility requirements reasonable?	As it is a “York Region” demonstration project, consideration should be given to including all customers within the Region to fully maximize the learning opportunities.
	Are there other issues that are important to the success of the demonstration?	It is important to demonstrate the IESO administered market can integrate IDSO's. This is a primary barrier to fully integrating DER's and extracting full value to the benefit of the rate payer.
NWA Markets White Paper	Are there other concepts from the NWA Markets White Paper that are worthwhile to explore in the demonstration?	As mentioned in section 3.3 of the paper under “Multi-Service Participation”, Energy Storage Canada (ESC) would be interested in having IESO further explore in the demonstration how it could help inform the development of a Multi-Service Framework which would allow resources, such as energy storage, the

Topic	Question	Feedback
		ability to provide all electricity services (energy, capacity, ancillary) that they are technically capable of providing. If the demonstration could help highlight what regulatory or technical barriers need to be overcome to fully develop the ability for resources to provide multi-services, ESC believes it would be greatly beneficial to the system.
Transmission-Distribution Interoperability White Paper	Are there other concepts from the Transmission-Distribution Interoperability White Paper that are worthwhile to explore in the demonstration?	

General Comments/Feedback:

Energy Storage Canada is pleased that the IESO is exploring the potential for Non-Wires Alternatives (NWA's) at the Transmission and Distribution levels. Energy storage resources (regardless of technology) are flexible enough to provide various services, be it energy, capacity or ancillary, and would be a valuable resource for system operators to utilize under any scenario outlined in the NWA Markets White Paper. The ESC encourages the IESO to continue to look at all aspects of a potential NWA market and recommends that the IESO engage with the OEB in this undertaking to better understand the regulatory issues associated with implementation.