

Feedback Form

White Paper Part II: Exploring Expanded DER Participation in the IESO-Administered Markets – November 19, 2020

Feedback Provided by:

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Date: December 18, 2020

Following the November 19, 2020 webinar to discuss Part II of the Exploring Expanded DER Participation in the IESO-Administered Markets white paper, the IESO is seeking feedback from participants on the draft paper, including on the participation options, which will inform planning for future work to enable DERs. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the November 19, 2020 entry on the [Innovation and Sector Evolution White Paper Series webpage](#).

Please provide feedback by December 10, 2020 to engagement@ieso.ca. Please use subject: *Feedback: DER White Paper*. To promote transparency, this feedback will be posted on the [Innovation and Sector Evolution White Paper Series webpage](#) unless otherwise requested by the sender.

Thank you for your time.

DER Participation in IAMs

Topic	Feedback
Which of the options would be most effective to encourage DER participation in the IAMs? Why?	As the paper points out, there are 136 Distribution connected Waterpower facilities, 48 of which are less than 1MW in installed capacity. These facilities are operated not only to produce electricity but also provide local socioeconomic benefits from water resource management. This consideration must be factored into the design of the <u>option</u> for these resources to participate in the IAM.

Topic	Feedback
Are there additional potential impacts to stakeholders that have not been explored in the white paper?	The potential impact water resource management restrictions and requirements of provincial and/or federal agencies for small hydro facilities will often be inconsistent with maximizing dispatchability.

Implementation Considerations

Topic	Feedback
Are there additional implementation considerations that have not been explored in the white paper?	Figures 6 and 7 provide an overview of DER contract expiration over time. It would be helpful to break these figures down by resource type. Many small hydro contracts, for example, expire at the same time. This “bulkiness” of contract expiration should be taken into consideration in program design.

Looking Ahead to Implementation

Topic	Feedback
Which wholesale products/services would DER owners/aggregators seek to provide in the IAMs if these options were implemented in the future? Using what technologies? Are there specific options that would allow these products/services to be offered?	

General Comments/Feedback

I appreciate the work that the IESO has done to identify the “Population of DERs” by technology (Tables 2 and 3) as well as the breakdown provided with respect to the potential to aggregate under existing market rules (Tables 5 and 6). The OWA has worked collaboratively with the IESO in the past to compare data for Ontario’s 225 waterpower facilities (e.g. market participation, contract type). I would appreciate the opportunity to review the waterpower-specific data used by the IESO to prepare these tables.