

Feedback Form

Resource Adequacy Engagement webinar – November 18, 2020

Feedback Provided by:

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Following the November 18, 2020 Resource Adequacy engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the following items discussed during the webinar. Background information related to these feedback requests can be found in the presentation, which can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by December 9, 2020. 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.

Feedback on Key Resource Adequacy Discussion Areas

Topic	Feedback
<p>Will the key discussion areas proposed cover the major areas that need to be discussed with stakeholders to develop and operationalize the framework? Are there any major areas missing?</p>	<p>The IESO has proposed 4 key discussion areas to be discussed in Q1 2021 (Detailed Design Phase) in order to develop and operationalize the Resource Adequacy Procurement Framework (the Framework). The discussion areas include:</p> <ul style="list-style-type: none">• General Framework Details• Acquisition Target Setting• Planning Considerations• Transition <p>Atura Power agrees with the proposed major discussion areas as generally the substance of the details required to operationalize the Framework will be encompassed within one of these 4 core categories.</p> <p>Operationalizing the Framework and how to implement it practically and logistically across all timeframes will not be without its challenges. Due consideration will need to be given how resources with expiring contracts just outside of an identified "need" date will be treated or bridged until the next procurement period. With contract expirations of varying timelines, this suggests that there will likely be a need for more than just the initial transition period.</p>

Topic	Feedback
<p>Are there key discussion areas that should be prioritized or discussed before others?</p>	<p>As there are resources coming off contract in advance of the procurement Framework being operationalized, Atura Power believes that the Transition discussion needs to be prioritized.</p> <p>It is essential that asset owners understand and have certainty as to how their assets will be bridged until such time when the IESO is ready to operationalize its procurement mechanisms as contemplated under this high-level Framework. It is Atura's position that contract extensions are the appropriate bridging mechanism due to the administrative simplicity of that process.</p> <p>In addition to transition, Atura believes that the IESO should also prioritize the trigger criteria for launching the mid- and long-term procurement processes. This will require close coordination with the IESO's planning group and ensuring stakeholders are provided the relevant data and analysis to support the decision.</p> <p>Alongside or as a companion to trigger criteria, the IESO should also prioritize how target capacity thresholds will be determined for each of the 3-time horizons.</p>

General Comments/Feedback

Atura Power would like to commend the IESO on taking the necessary first steps in designing an Ontario-specific Resource Adequacy Procurement Framework. Atura Power supports the overall direction of the Framework and the engagement.

Atura is further encouraged that the IESO recognizes that a one-size-fits-all approach to capacity procurement is not suitable for Ontario when looking at balancing system needs alongside supplier and ratepayer risks. Acknowledgement that certain resource types require distinct procurement instruments, will help in advancing the resource adequacy discussions and ensuring that Ontario continues to maintain existing resources and procure new capacity when required.

Atura Power looks forward to working with the IESO and other stakeholders to develop the details to operationize the high-level Framework.