

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
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?	The key discussion areas (General Framework Details, Acquisition Target Setting, Planning Considerations, Transition Period) cover the necessary materials. However, we would suggest, in terms of the discussion schematic on slide 25 of November 18 th , an additional overlay topic of IESO Governance & Transparency referencing the four key discussion areas, as this additional discussion topic is relevant and important to the framework, to target setting, planning considerations, and to actions taken during the transition period.
Are there key discussion areas that should be prioritized or discussed before others?	There are aspects of the discussion areas that may be discussed in parallel. We do not have specific comments on the sequencing of the discussion.

General Comments/Feedback

We would refer back to our comments submitted on October 20th, 2020 in which we propose an enhanced power system planning process through:

Increased IESO transparency to aid in better investment decision-making by potential investors through higher levels of confidence in future needs.

Expanding the scope of power planning to provide more detailed information to stakeholders on the needs of the future system (for example, on operability, ancillary services, zonal adequacy).

Clarity on Governance Structure to also underpin confidence in current and future decision-making and increased confidence for participants as to the “rules of the road”.

In terms of more specific comments, we would recap our comments of October 20th by encouraging the IESO to consider evaluating potential new long-life resources by taking into account ratepayer value on a bundled-services basis, as well as considering long-term commercial underpinnings to attract lower-cost capital, which may secure higher total value over the long term as compared to separately procuring individual services over shorter time-frames (which may be a more appropriate method of procuring services from off-contract and shorter-life assets, but which may preclude new-build investment in certain categories of efficient but long-lead-time asset classes). We would also reinforce IESO’s general message of using competition for procurement, and add that where competition is not possible, a public adjudicative or quasi-adjudicative process should be employed to ensure an appropriately vetted and transparently established justification for significant new procurements.

We commend the IESO on the depth and breadth of this stakeholder engagement, and appreciate the opportunity to comment.