Feedback Form

Resource Adequacy – July 22, 2021

Feedback Provided by:

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Organization: Rodan Energy

Email:

Date: August 13th, 2021

To promote transparency, feedback submitted will be posted on the Resource Adequacy Engagement webpage unless otherwise requested by the sender.

Following the July 22, 2021 Resource Adequacy webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the following discussed items. 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 August 13, 2021. If you wish to provide confidential feedback, please mark the document "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.



Qualified Capacity Proposals

Topic	Feedback
What questions or feedback do you have on the updated Qualified Capacity (QC) proposals?	
What questions or feedback do you have on the proposed QC methodology for hourly demand response resources?	Rodan Energy supports the comments filed by AEMA. This includes the need to ensure the accurate measurement of the HDR resource, equitable treatment of different resources types under the differing UCAP proposal and the inclusion of line losses in the HDR UCAP methodology if the IESO does move to UCAP for HDR resources. The baseline methodology used today does not, in the opinion of Rodan, accurately reflect the MW being reduced by HDR resources during an event. This methodology is currently being reviewed. The IDA allows for one large resource to affect the baseline of an aggregated portfolio disproportionately negatively, making it appear at times that a resource is underdelivering. Until the baseline review is completed, the IESO should not be moving the HDR resource to UCAP. Rodan echoes the points put forward by AEMA on the review – different types of baseline calculations should be used for different resource types or an opt out option for the in-day adjustment should be allowed. Additionally, Rodan is opposed to the concept of carrying a "performance factor" from one delivery year into the next. Aggregators could be negatively impacted by a contributor that doesn't respond during an event, reducing the PAF for the aggregator. This bad actor could then flee to a different aggregator in future years to obtain a better PAF. A strong testing regime along with the correct penalty/incentive performance schema should be in place to accurately measure the contribution of the HDR resource in the season at hand versus the introduction of UCAP.

Resource-Backed Imports

Topic	Feedback
What questions or feedback do you have on the proposed resource-backed import framework?	

General Comments/Feedback

Click or tap here to enter text.