Feedback Form

Resource Adequacy – August 26, 2021Feedback Provided by:

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Organization: Demand Power Group Inc.

Email:

Date: September 10, 2021

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

Following the August 26, 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 September 17, 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.



Capacity Auction – Review of Performance Obligations and Assessment Framework Recommendations

Торіс	Feedback
What questions or feedback do you have on Proposed Change #1 – Test to Capability for All Resources	Click or tap here to enter text.
What questions or feedback do you have on Proposed Change #2 – Changes to Thresholds	Click or tap here to enter text.
What questions or feedback do you have on Proposed Change #3 – Future De-Rates	Click or tap here to enter text.
What questions or feedback do you have on Proposed Change #4 – Common Notification	Click or tap here to enter text.
What questions or feedback do you have on Proposed Change #5 – Incenting Performance at the Right Time	Click or tap here to enter text.
What questions or feedback do you have on Proposed Change #6 – Availability Assessment True-Up	Click or tap here to enter text.
General comments and feedback	Click or tap here to enter text.

Medium-Term RFP

Торіс	Feedback
What questions or feedback do you have on the Medium-Term RFP proposed design consideration on Contractual Considerations	Click or tap here to enter text.

Торіс	Feedback
What questions or feedback do you have on the Medium-Term RFP proposed design consideration on Resource Eligibility	Demand Power requests that the ISO reconsider its exclusion of demand response resources from the RFP.
	The ISO is concerned with reliability, of course. Thus, it has focused the RFP on existing resources. Yet, the proposed rules exclude one class of existing resource – existing demand response. Existing demand response resources are reliable and indeed, have proven their reliability. Existing demand response resources ought to be allowed to compete in the RFP on the same terms as other existing resources.
	The ISO has indicated that the scope of this RFP is on existing assets. If so, existing demand response assets should be treated the same as other existing assets. Indeed, the ISO has indicated that the RFP is open to existing merchant resources that have previously been registered as a Market Participant or Ancillary Service Provider. Many existing demand response resources satisfy this criteria and can provide reliable capacity service as requested in the RFP.
	In particular, existing demand response resources which provide the demand response via behind the meter existing battery storage assets are particularly reliable and ought to be allowed to compete in the RFP. Such resources are fundamentally just as reliable as any other 'iron in the ground'. And given that such resources are existing, they can certainly be relied upon to meet an in-service date starting in 2026.
	Finally, it appears that the ISO is wary of contracting with 'less certain, new resources." While this concern may be reasonable, it does not apply to existing demand resources which are neither new nor less certain.

What questions or feedback do you have on the Medium-Term RFP proposed design consideration on **Proposal Evaluation**

Click or tap here to enter text.

Торіс	Feedback
What questions or feedback do you have on the Medium-Term RFP proposed design consideration on Contract Expiry and Bridging	Click or tap here to enter text.
What questions or feedback do you have on the Medium-Term RFP proposed Timelines and Milestones	Click or tap here to enter text.
What questions or feedback do you have on the Medium-Term RFP UCAP approach outlined in the presentation materials	Click or tap here to enter text.
What areas of the draft RFP and Contract do you want to see more details on in the September engagement session, ahead of the issuance of draft documents?	Click or tap here to enter text.
Do you have a resource that is eligible, or may be eligible, to participate? If so, please provide feedback specific to your resource based on the proposed design considerations. Please indicate if you would like to meet with the IESO to discuss eligibility or any other aspects of the Medium-Term RFP.	Click or tap here to enter text.
General comments and feedback	Click or tap here to enter text.

General Comments/Feedback

Click or tap here to enter text.