

# Feedback Form

## Resource Adequacy – August 26, 2021

### Feedback Provided by:

Name: Julien Wu

Title: Director, Regulatory Affairs

Organization: Evolgen by Brookfield Renewable

Email: [REDACTED]

Date: Sept 17, 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](mailto: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

Topic	Feedback
What questions or feedback do you have on Proposed Change #1 – <b>Test to Capability for All Resources</b>	Click or tap here to enter text.
What questions or feedback do you have on Proposed Change #2 – <b>Changes to Thresholds</b>	Click or tap here to enter text.
What questions or feedback do you have on Proposed Change #3 – <b>Future De-Rates</b>	Click or tap here to enter text.
What questions or feedback do you have on Proposed Change #4 – <b>Common Notification</b>	Click or tap here to enter text.
What questions or feedback do you have on Proposed Change #5 – <b>Incenting Performance at the Right Time</b>	The IESO should consider a positive performance-based incentive mechanism similar to what is in place in ISO-NE. The IESO has indicated that non-energy-delivery penalties would provide incentives for generators to perform when called upon (i.e. a negative performance-based incentive), but the IESO would not reward additional delivery when system is in shortfall. A positive performance-based incentive (i.e. voluntary over-delivery when system need is present) would enable market signals to encourage generators to offer, thus increasing competition.
What questions or feedback do you have on Proposed Change #6 – <b>Availability Assessment True-Up</b>	Click or tap here to enter text.
General comments and feedback	Click or tap here to enter text.

## Medium-Term RFP

Topic	Feedback
What questions or feedback do you have on the Medium-Term RFP proposed design consideration on <b>Contractual Considerations</b>	Click or tap here to enter text.
What questions or feedback do you have on the Medium-Term RFP proposed design consideration on <b>Resource Eligibility</b>	Click or tap here to enter text.
What questions or feedback do you have on the Medium-Term RFP proposed design consideration on <b>Proposal Evaluation</b>	Click or tap here to enter text.
What questions or feedback do you have on the Medium-Term RFP proposed design consideration on <b>Contract Expiry and Bridging</b>	Please confirm that early contract termination would be contingent upon successful RFP reward.
What questions or feedback do you have on the Medium-Term RFP proposed <b>Timelines and Milestones</b>	Click or tap here to enter text.
What questions or feedback do you have on the Medium-Term RFP <b>UCAP approach</b> 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?	Please confirm that the top 200 hours of Ontario demand measure accounts for exports.
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

Evulgen supports the comments submitted by the Renewable Consortium re: AAR and Aug 26 Resource Adequacy presentation. In particular, revenue risk as the IESO moves to procure only capacity in the capacity market and the RFPs presents a significant barrier for IPPs to invest in new-builds and re-powering. For reasons outlined in the Consortium submission, Evulgen does not

believe that capacity procurement via the capacity market or RFPs should be measured by the UCAP methodology. Qualifying capacity with the ICAP methodology combined with an IESO-controlled performance evaluation is more consistent with industry practice, and would deliver to the IAM more reliable capacity offers and supply. In any case, Evolugen supports consistent capacity qualification methodologies for internal capacity, system-backed external capacity, and resource-backed external capacity across the capacity market and RFPs. Finally, Evolugen calls on the IESO to value renewable attributes via market mechanisms or product offerings. For example, a green tariff, or a special tariff rate allowing customers to voluntarily source their electricity from renewable resources, could be considered by the IESO.