Feedback Form

2022 Capacity Auction Enhancements - Implementation – December 15, 2021

Feedback Provided by:

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Organization: Energy Storage Canada

Email:

Date: January 7, 2022

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

- Following the December 15, 2021 Resource Adequacy webinar, the Independent Electricity
 System Operator (IESO) is seeking feedback from stakeholders on the following items:
 Capacity Auction proposed Market Rule amendments and draft Market Manuals for
 the 2022 Capacity Auction
- 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 January 7, 2022. 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.



Market Rules

| Market Rule Chapter | Title | Sub-section | Feedback |
|------------------------|---|-------------|--------------------|
| | System Operations and Physical Markets | | See comments below |
| Ch. 9 | Settlements and Billing | | See comments below |
| Ch. 11 | Definitions | | See comments below |

Market Manuals

| Market Manual | Title | Sub-section | Feedback |
|---------------|--|-------------|--------------------|
| 12 | Capacity Auctions | | See comments below |
| | Submission of Dispatch Data in the Real Time Energy and Operating Reserve Markets | | See comments below |
| | Real Time Scheduling of the Physical Markets | | See comments below |
| | Physical Markets Settlement Statements | | See comments below |
| | IESO Charge Types and Equations | | See comments below |
| 7.3 | Outage Management | | See comments below |

General Comments/Feedback

ESC is very concerned about the IESO's diversion from its governance and decision-making process with respect to changes to proposed market rule amendments. On December 15th, ESC submitted the following feedback, which has not yet been addressed:

"ESC echoes some of the concerns expressed during the webinar with respect to implications of the proposed changes within the Capacity Auction and implications Demand Response resources. While respecting the need to ensure resource availability during times of needs, we do not find that the IESO has backed-up the proposed changes with robust analysis. For

example, IESO did not provide evidence of reasonableness for the proposed 10x performance charge, including how this compares to other charges applicable in the IAM."

The IESO has proposed draft market rule amendments without first adequately addressing comments received from stakeholders.