

Feedback Form

IESO Reliability Standards Review – December 14, 2020

Feedback Provided by:

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Following the December 14, 2020 webinar on IESO Reliability Standards, the IESO sought feedback from participants on the proposed methodology and approach outlined in the presentation with respect to intertie support (non-firm imports).

These are the comments of the Association of Power Producers of Ontario (APPrO).

Intertie Support (Non-Firm Imports)

Topic	Feedback
Have the areas of consideration been appropriately included in the proposed methodology?	<p>APPo continues to recommend that the IESO review other aspects of the resource adequacy standard. We appreciate the IESO responses to these suggestions but would like to see firm dates for reviews and providing transparency around these assumptions.</p> <p>In our September 2020 comments, we recommended that the IESO review the demand assumptions relating to ICI and climate change, forecasting changes to forced and planned outage rates, and incorporating planned transmission outages into adequacy assessments. We are seeking clarity on how and when these issues will be reviewed.</p>
Are the approaches outlined reasonable for forecasting real-time market imports?	<p>At a high-level, the proposed approaches for forecasting the adequacy contribution of real-time market imports is reasonable. However, it is difficult to assess the reasonableness without any of the underlying data or analysis.</p> <p>We request that the IESO provide the underlying data and analysis publicly to allow stakeholders to understand the methodology and how it could change in the future.</p> <p>The use of historical data in these calculations is reasonable but creates significant uncertainty for market participants. There could be large changes in the amount of real-time imports relied on if the underlying historical data is subject to change, particularly as Ontario transitions from a capacity surplus to a capacity shortfall.</p>

General Comments/Feedback

APPrO previously stated that, “transparency and reproducibility of the resource adequacy methodology will support investment in existing and prospective resources.” We continue to hold this view and recommend that the IESO release all data that is not subject to confidentiality requirements. We also ask that the IESO explain what data is confidential and why it is confidential, so that participants can start discussions with the IESO about releasing data in an appropriate manner where possible (for example, with a time lag to address confidentiality concerns).

Providing more data and detail around the analysis used will allow participants to understand the IESO’s rationale for certain decisions, such as using 90th percentile dependable values. It is critical that stakeholders be afforded the opportunity to test these decisions.