

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 is seeking feedback from participants on the proposed methodology and approach outlined in the presentation with respect to inertia support (non-firm imports). The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the December 14, 2020 entry on the [Reliability Standards Review webpage](#).

Please provide feedback by January 18, 2021 to engagement@ieso.ca. Please use subject: *Feedback: Reliability Standards Review*. To promote transparency, this feedback will be posted on the [Reliability Standards Review webpage](#) unless otherwise requested by the sender.

Thank you for your time.

Intertie Support (Non-Firm Imports)

Topic	Feedback
Have the areas of consideration been appropriately included in the proposed methodology?	<p>Capital Power appreciates the IESO's responsiveness to stakeholder feedback submitted in late 2020 and looks forward to receiving details of the full methodology, to be included the upcoming Resource Adequacy Methodology document. Capital Power expects this detail to include but not be limited to the methodology and assumptions guiding the IESO's analysis of the following:</p> <ul style="list-style-type: none">• forecasted intertie congestion and forecasted internal Ontario transmission congestion• anticipated carbon pricing and policies, and corollary expectations for import economics• the forecasted effects of Market Renewal on intertie pricing• the effects of climate change on weather normalized demand and price forecasts• the processes by which the IESO both (i) forecasts firm imports, and (ii) incorporates this forecast into its analysis of whether capacity/economic incentives remain for non-firm imports <p>This detail will help stakeholders understand how the IESO will assess risks to non-firm import forecasts. For example, stakeholders should understand how the IESO assesses whether historical non-firm import patterns will repeat in future years where provincial and federal carbon policy may change the economics for certain importers.</p>

Topic	Feedback
Are the approaches outlined reasonable for forecasting real-time market imports?	As presented, the approaches outlined do not appear unreasonable. Capital Power believes it would be helpful to reassess this question when the full methodology is available for review.

General Comments/Feedback

Capital Power appreciates the IESO's efforts to respond to stakeholder feedback and looks forward to future stakeholder sessions on this issue.