Demand Response Working Group

Feedback Form – September 4, 2019

Date Submitted: 2019/09/11

Feedback provided by (optional):

Company Name: Rodan Energy Contact Name: Farhad Quassem

Phone:

Email:

Following the September 4, 2019 meeting of the Demand Response Working Group (DRWG), the Independent Electricity System Operator (IESO) is seeking feedback from participants on questions posed during the presentation. The presentation can be accessed from the DRWG engagement webpage.

Please submit feedback to engagement@ieso.ca. To promote transparency, this feedback will be posted on the DRWG engagement webpage unless otherwise requested by the sender.

Agenda Item: Cost Recovery for Out-of-Market Activation Payments

Stakeholders are asked to review and provide feedback on the proposed market rule amendments and market manual concepts, to enable out-of-pocket activation payments, by **September 11**, **2019**.

Please provide comments relating to the section of the draft amendment and concept proposal in the corresponding box below. Please include any views on whether the draft language clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language below and red-lining the suggested changes.



MR Chapter	Design Element (MR section)	Stakeholder Comments on Amendments
7	System Operations and Physical Markets	Agree with proposed amendments
9	Settlements and Billing	Agree with proposed amendments.
ММ	Design Element (MM section)	Stakeholder Comments on Amendments
5.5	Physical Markets Settlement Statements	 Agree with Equation 1 as long as HDRs are allowed to self-schedule tests, otherwise HDRTAPR should be replaced with HDRBPh.
		 Self-scheduling is permitted, within reason to PJM. PJM DR participants schedule their own tests and must notify PJM of the intent to test 48 hours in advance of the test. DR aggregators can also re-test specific customers if they deliver at least 75% of their obligation in the first test to get closer to 100%.
		 Agree with Equation 2 for Emergency Activations
7.3	Outage Management	Agree with proposed amendments.
12	Capacity Auction	Agree with proposed amendments.
	IESO Charge Types and Equations	Agree with proposed amendments.
	Format Specifications for Settlement Statement Files and Data Files	Agree with proposed amendments.

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Stakeholder comment is requested on the following IESO directed questions that will be forwarded to Technical Panel for their consideration in the recommendation of *market rules* to the IESO Board of Directors:

Stakeholder Comment

Do you believe there is a clear and common understanding of the intent and purpose of the draft market rule amendment?

In your view, is this market rule amendment in the interest of consumers with respect to prices?

In your view, is this market rule amendment in the interest of consumers with respect to the reliability of electricity service?

In your view, is this market rule amendment in the interest of cosumers with respect to the quality of electricity service?

In your view, are there any adverse effects (not identified in a previous answer) that may be caused by implementing these proposed changes, either to consumers or market participants?

The Market rule changes will treat the payment for tests and for EOSC activation differently, while the costs associated with both curtailments is likely identical. Rodan has recommended that acceptance of \$250/MWh for tests would be palatable but only if the IESO permits self-scheduling of tests, within reasonable parameters, in order to reduce costs for participants.

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Other Agenda Items

Feedback on all other agenda items is requested in the form below.

Agenda Item: Estimates of Demand Response Potential in Ontario

Question/Topic	Stakeholder Feedback
Please provide feedback by September 11, 2019 DRWG members interested in participating in a one-on- one meeting with the IESO to discuss demand reponse potential are asked to identify their interest.	Rodan is interested in a one-on-one meeting with the IESO to discuss DR potential.
Agenda Item: HDR Resource Testing - Proposal Question/Topic	Stakeholder Feedback
Please provide feedback by September 18, 2019 Seeking stakeholder feedback on the proposal.	Rodan will respond to this section by September 18.
Agenda Item: M&V/Data Submission - Proposal Question/Topic	Stakeholder Feedback
Please provide feedback by September 18, 2019 Seeking stakeholder feedback on the proposal.	Rodan will respond to this section by September 18.

Other Comments/Feedback:

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