

Feedback Form

Distributed Energy Resources (DER) Market Vision and Design Project – January 26, 2022

Feedback Provided by:

Name: Justin W. Rangooni

Title: Executive Director

Organization: Energy Storage Canada

Email: jrangooni@energystoragecanada.org

Date: February 16, 2022

Following the January 26th public webinar on the DER Market Vision and Design Project, the Independent Electricity System Operator (IESO) is seeking feedback from participants on clarity of the DER Market Vision Project Timelines and Deliverables, and with respect to the EPRI presentation on FERC Order 2222 and the market participation models being developed and implemented in other jurisdictions, feedback from stakeholders on which aspects of DER integration efforts from other jurisdictions are most appropriate for Ontario and why.

The referenced presentation can be found on the [DER Market Vision and Design Project webpage](#).

Please provide feedback by February 16, 2022, to engagement@ieso.ca. Please use subject header: *DER Market Vision and Design Project*. To promote transparency, this feedback will be posted on the [DER Market Vision and Design Project webpage](#) unless otherwise requested by the sender.

The IESO will work to consider and incorporate comments as appropriate and post responses on the webpage.

Thank you for your contribution.

DER Market Vision Project Timelines and Deliverables

Topic	Feedback
<p>Are the deliverables clear? If not, what additional information would be most helpful at this early stage?</p>	<p>ESC believes the deliverables are reasonably clear. Additional clarity with respect to the approach for establishing criteria and initial options for Phase I questions would be useful. For example, will the IESO prepare options for stakeholder feedback and input? How will IESO account for unique attributes of the Ontario market relative to other markets? What will be IESO’s process for decision making related enablement; including completion of analysis.</p> <p>With respect to criteria to determine foundational vs. enhanced models, can the IESO clarify if changes to IESO dispatch tools would be considered in the foundational model considering the proposed implementation period is post-MRP?</p> <p>We recommend that the IESO clarify whether the foundational model will build on the Long-Term Storage Design Vision; or clarify any dependencies.</p>

DER integration efforts from other jurisdictions

Topic	Feedback
<p>Which aspects of DER integration efforts from other jurisdictions are most appropriate for Ontario and why?</p>	<p>ESC recommends the following for consideration:</p> <ol style="list-style-type: none"> 1) Development of options for dual participation framework which enables DERs to provide services to both IESO-administered markets (IAM) and local markets (e.g., distribution-level NWAs); ESC expects that LDCs will acquire energy storage as a service in the

Topic	Feedback
	<p>future, and there should be a framework in place to avoid duplication and enable revenue-offsets from wholesale market</p> <ol style="list-style-type: none"> 2) Ensuring framework for BTM energy storage, where energy storage can inject energy from a BTM connection; ESC believes that BTM storage should be treated differently from DR (load control) as it has potential to inject energy 3) Options for metering and telemetry that reduce costs and complexity for participants; ESC is mindful that participation models will only be viable and useful if not unduly costly 4) Enabling heterogeneous aggregations; ESC believes that storage could be added to aggregations of existing assets to firm up capacity and enable aggregated resources to provide additional ancillary services 5) IESO should clarify how the DER market vision relates to the continued availability of current participation models; e.g., HDR. 6) Continued optionality for zonal aggregations in future market; ESC is mindful that IESO currently procures aggregated HDR capacity on a zonal basis.

General Comments/Feedback

ESC is supportive of the IESO’s DER Market Design vision project. We, however, continue to raise concerns regarding timelines fully enabling DERs, distributed energy storage & BTM storage in particular, to participate in the IAMs. With upcoming capacity needs this decade ESC believes all energy storage resources, IFM & BTM, short and long duration and Dx and Tx connected will need to play a role to ensure reliability and timelines should be accelerated. We look forward to next steps in this discussion and to continued progress.