

Message

To: Tam Wagner [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=70ad853871354761a98848de59c4c792-Tam Wagner]
Subject: RE: Energy Storage/GA Reg 429/04
Attachments: GA-Net-Volume_Explained.docx

I saw you upstairs. 429/04 is settlement and it is scary that we are rushing through the changes. We do not believe the suggested change will work so I am going to work through with Richard and Idalin tomorrow for directly connected and embedded. Initially, I thought why not exempt them like pump storage (which Richard thinks will need to change if we add storage to the mix) and then Richard pointed out that it takes away any incentive to be efficient with the technology. If you want to maximize the non-payment of your GA and uplift charges, you need to have equipment that can inject close to withdraw MWs (efficient equipment which we should promote). It also allows us to anticipate the injections if there is incented efficiency.

We have no visibility at the distribution level and maybe we do not care other than we need to treat the injection as part of the embedded generation number.

Regards,

Jeannette Briggs Director, Settlements - Corporate Services
Independent Electricity System Operator (IESO) | T: 905-855-6364 | C: 416-997-6364
Station A, Box 4474, Toronto, ON, M5W 4E5
Web: www.ieso.ca | Twitter: [IESO_Tweets](https://twitter.com/IESO_Tweets) | LinkedIn: [IESO](https://www.linkedin.com/company/ieso)
Conservation: www.saveONenergy.ca | Twitter: [saveONenergyOnt](https://twitter.com/saveONenergyOnt) | LinkedIn: [saveONenergy](https://www.linkedin.com/company/saveONenergy)

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From: Tam Wagner
Sent: October 02, 2017 1:28 PM
To: Jeannette Briggs; Jessica Savage; Anthony Lovachis; Darryl Yahoda
Cc: Jordan Penic; David Barrett; Beverly Nollert; Richard Duffy; Richard Zaworski; Edward Arlitt
Subject: RE: Energy Storage/GA Reg 429/04

Given the potential implications to our work on the implementation directive, I would like to be a part of this discussion as well. I'm not available Wednesday or Friday. If these dates work best for everyone else's schedule, Beverly will attend in my place.

Thanks,
-Tam-

From: Jeannette Briggs
Sent: October 02, 2017 1:05 PM
To: Jessica Savage; Anthony Lovachis; Darryl Yahoda
Cc: Jordan Penic; David Barrett; Tam Wagner; Beverly Nollert; Richard Duffy; Richard Zaworski; Edward Arlitt
Subject: RE: Energy Storage/GA Reg 429/04

I will attend and I cannot do Wednesday or Thursday morning.

Regards,

Jeannette Briggs Director, Settlements - Corporate Services

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Web: www.ieso.ca | Twitter: [IESO_Tweets](#) | LinkedIn: [IESO](#)

Conservation: www.saveONenergy.ca | Twitter: [saveONenergyOnt](#) | LinkedIn: [saveONenergy](#)

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From: Jessica Savage

Sent: October 02, 2017 12:44 PM

To: Anthy Lovachis; Jeannette Briggs; Darryl Yahoda

Cc: Jordan Penic; David Barrett; Tam Wagner; Beverly Nollert; Richard Duffy; Richard Zaworski; Edward Arlitt

Subject: RE: Energy Storage/GA Reg 429/04

Anthy –

You might want to also send to Darren Matsugu (or his delegate) given the MR implications. I will attend on behalf of Ops (as long as the meeting is not on Thursday).

Thanks.

Jessica

From: Anthy Lovachis

Sent: October 02, 2017 12:18 PM

To: Jeannette Briggs; Darryl Yahoda; Jessica Savage

Cc: Jordan Penic; David Barrett; Tam Wagner; Beverly Nollert; Richard Duffy; Richard Zaworski; Edward Arlitt

Subject: RE: Energy Storage/GA Reg 429/04

Hi everyone,

As David noted below, the ministry is looking to set up a meeting this week at Adelaide on the proposed changes to Reg 429. They're hoping to understand how an amendment would interact with IESO processes, mainly the market rules, market participation (customer v. market participant) etc.

Please let me know who from your respective groups will attend and provide availability for this week. On ministry side, Ryan Zade, Eamon O'Riordan and Mark Bergman are expected to attend.

Thank you,

Anthy

From: David Barrett

Sent: September 26, 2017 1:16 PM

To: Jeannette Briggs; Darryl Yahoda; Tam Wagner; Beverly Nollert; Jessica Savage

Cc: Anthy Lovachis; Michael Boll; Jordan Penic

Subject: RE: Energy Storage/GA Reg 429/04

No word yet on if they will coordinate the changes to the **reg** for storage and FHP. Since the Minister also signalled in his OEA speech yesterday that they intend to move to amend the reg for applicability of GA to storage, I'd like to convene with them soon to discuss so they don't go too far without talking to us.

Some further intel:

- Add energy storage facility definition to the reg
 - no proposed definition yet so consider this for discussion. Prior Ministry work on this consider only Type 1 as eligible (i.e. Type I, whose sole purpose is to return stored electricity to the grid, attached page 5)
 - ESC has a draft proposed definition in their draft omnibus changes from earlier this year (#5 in attached)
- Amend the formula in s.11(2) 3 Class B market participants to subtract the volume of electricity reinjected by storage facilities: $\{ [(M - N) \times U] / (P - Q) \} - I$, where I "is the volume of electricity re-injected by an back into the IESO controlled grid or the distribution system of a licenced distributor, if the Class B market participant is a licenced energy storage facility, in accordance with the market rules" [*this last part is unnecessary*]; M, N, P, Q keep their meaning as in subsection 10 (1)
- They want to discuss ICI and treatment of Beck PGS and the definition of "net volume withdrawn"
- They are also trying to connect with OEB on this

Immediate gaps include how this work will affect the LTEP implementation plan development, metering and registration considerations, and how to account for on-site generation.

From: Jeannette Briggs

Sent: September 24, 2017 1:35 PM

To: David Barrett

Cc: Anthy Lovachis; Jordan Penic; Darryl Yahoda; Tam Wagner; Beverly Nollert; Jessica Savage; Michael Boll

Subject: RE: Energy Storage/GA Reg 429/04

We are also updating 429/04 for Ontario Fair Hydro Plan Act changes. Any idea if this is being done on the same schedule?

Regards,

Jeannette Briggs Director, Settlements - Corporate Services

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Conservation: www.saveONenergy.ca | Twitter: [saveONenergyOnt](#) | LinkedIn: [saveONenergy](#)

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From: Jessica Savage

Sent: September 22, 2017 3:33 PM

To: David Barrett

Cc: Anthy Lovachis; Jordan Penic; Darryl Yahoda; Jeannette Briggs; Tam Wagner; Beverly Nollert

Subject: RE: Energy Storage/GA Reg 429/04

Looping in Tam and Bev who are IESO leads on this Implementation Directive. Bev has setup an internal meeting next week to discuss scope of the implementation plan; this development will impact that plan.

Jessica

From: David Barrett
Sent: September 22, 2017 3:25 PM
To: Darryl Yahoda; Jeannette Briggs
Cc: Anthy Lovachis; Jessica Savage; Jordan Penic
Subject: Energy Storage/GA Reg 429/04
Importance: High

Just had a call from Ministry staff who have been directed by the MO to move quickly (by end of October?) to propose changes to Reg 429/04 and the treatment to GA for certain classes of energy storage facilities. They're aware of the possible conflict with the Implementation Directive. I'll get more information soon (i.e. scope of change, what classes they have in mind, etc.), but given timing, we do need to set up some time to review what they're thinking very soon, say mid-next week. For now this is a staff-level discussion. I'll push for a meeting at Adelaide. Let me know what your availability is.

Many thanks,
David

M: (905) 601-6481