

ISSUES/ACTIONS LOG

Last Updated: 24-07-2018

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SE Session	Issue/Action Description	IESO Response	Status
DAM – Mar '18	OPG has suggested the IESO consider removing (or increasing) the 10 MW barrier for registration as a self-scheduler. OPG understands the IESO's concern for loss of flexibility provided by dispatchable resources (Slide #68); however, it was not our intent to compromise the IESO's ability to assess each registration for impact on flexibility (among other factors). Rather, the proposal was intended to provide an option for a supplier to request a review by the IESO for certain facilities that may not be able to provide flexibility to the system but are required to pursue dispatchable registration simply because of their size.	The IESO is currently assessing this feedback as it relates to improving DAM scheduling certainty for hydro-electric resources that may have limited dispatch capability. The IESO plans on providing greater information at the September 2018 meeting.	Open
SSM - Aug '17	A participant requested further analysis on the prices during the intervals when the various operating constraints were violated. This data would show whether prices were driving desirable behaviour during these events.	This is beyond the scope of the high level design. Constraint violation prices will be determined as part of the detailed design phase.	Open
SSM - Aug '17	We will need additional analyses from the IESO to see just what the difference to the market is if dispatchable load (DL) becomes non-dispatchable (NDL) in some areas. The IESO loses flexibility in terms of OR, but is that valuable enough to engage in some differentiated pricing regime? May need to think about if DL can move between DL and NDL just using their bids (i.e. DL is NDL today if their bid is \$2000). If we choose one of these differentiated pricing regimes, does load lose that ability on an hour by hour basis? Need to consider both DL impact as well as impact to everyone else	INITIAL RESPONSE: As the SSM engagement progresses, the IESO is open to examining such scenarios with stakeholders, as appropriate. The IESO will add this to the action items tracker. UPDATE: These analyses are beyond the scope of the high level design. However, addressing this issue will be part of the detailed design phase.	Open

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ERUC - Jan '18	If a facility receives a binding ERUC instruction, its offers would be restricted as per the preliminary decision. No increases or more restrictive offers would be allowed for that ERUC resource. However, if the ERUC resource was only committed for partial volumes for those hours, offers changes should be allowed for the non-committed volumes.	INITIAL RESPONSE: The decision to commit is based on evaluation of the entire advisory schedule provided at the time of commitment. However, the IESO recognizes the need to consider the quantity to which the restriction applies: advisory schedule or full capacity of the resource. This will be further discussed at the March meeting. UPDATE: The IESO presented a preliminary decision on the quantity to which the restriction applies and the method for implementing the restriction at the stakeholder meeting in July.	Closed
ERUC - Jan '18	Will a generator in the middle of its ERUC commitment be allowed to raise prices associated with any additional megawatts beyond the level committed under ERUC if there happens to be demand for them?	INITIAL RESPONSE: The IESO agreed to consider this question and present a response at the March meeting. UPDATE: The IESO presented a preliminary decision on the quantity to which the restriction applies and the method for implementing the restriction at the stakeholder meeting in July.	Closed
ERUC - Jan '18	Binding start-up instructions cover the initial MGBRT period and subsequent ERUC runs may add hours and/or megawatts. Will offer restrictions, outlined in the presentation, apply to the entire advisory schedule or just the MGBRT period?	INITIAL RESPONSE: The IESO will work with stakeholders to address this issue in future meetings. UPDATE: Offer price increases are restricted for all hours of the pre-dispatch advisory schedule provided at the time of commitment. The IESO presented preliminary decisions at the July meeting with respect to the applicable quantity and method of implementing the restriction.	Closed
DAM - Jan '18	The IESO has nicely reflected the gas-electric coordination project in the early timeline indications. It is important that the IESO continue to integrate DAM processes with natural gas market timelines, particularly in two areas: 1. Offer submission deadline that allows time for indicative trades and prices to be published (10:00 EPT or thereafter); and, 2. DAM financially-binding commitment schedule received ahead of natural gas timely nomination window, with a time window to make those submissions (no later than 13:30 EPT).	INITIAL RESPONSE: From the Gas-Electric Coordination Enhancements stakeholder engagement, the IESO understands that the main priority of natural gas generators in Ontario with respect to Day-Ahead processes is to have them better align with the natural gas timely nomination window (14:00 EPT). Whether the submission deadline can be deferred beyond the current proposal of 09:00 EST will be considered during detailed design when vendor software capabilities are known. UPDATE: The IESO presented a preliminary decision at the July stakeholder. DAM will be executed in eastern prevailing time (EPT) while results will continue to be provided in eastern standard time (EST)	Closed
DAM - Mar '18	A participant asked whether a failed physical withholding test will result in an automatic settlement adjustment or an initial dialogue between the IESO and the affected resource.	There will be a dialogue between the IESO and affected market participant(s) prior to settlement adjustments.	Closed

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DAM - Jan '18	<p>With regards to the real-time must offer obligation, there should be an opportunity to differentiate unavailability due to a mechanical issue (i.e. outage) from unavailability due to an operating parameter (i.e. ramp duration would not allow unit to start and run within the evaluation period).</p>	<p>INITIAL RESPONSE: The IESO will be bringing forward secondary decisions for the must offer requirement that differentiate between mechanical unavailability and unavailability due to other operating parameters.</p> <p>UPDATE: Secondary design considerations were brought forward for stakeholder review and comment at the March meeting. In response to stakeholder feedback, the IESO is no longer proposing an offer obligation in order to assess whether physical withholding has taken place. Rather, this assessment will be performed after-the-fact and would consider what factors may have caused a resource to become unavailable.</p>	Closed
DAM - Oct '17 (2)	<p>The information provided during the DAM Fundamentals session for hydroelectric resource scheduling in other jurisdictions has been limited. OPG is of the view that the DAM design is critical in optimizing OPG's hydroelectric resources and maximizing the benefits that can be realized by these existing assets for the system and the customer. It would be appreciated if further information could be provided for those ISO's that have significant hydroelectric resources. Possible ISO's that meet this criteria would be NYISO, CAISO and European ISOs; such as, Nord Pool. Some of the areas that OPG would like additional details include:</p> <ul style="list-style-type: none"> • Options available for hydroelectric resource offer submissions into the DAM to mitigate the risks associated with water flow/elevation variations and regulatory restrictions as per water management plans; • DAM and Dispatch engine design basics that model cascading river systems; and • How hydroelectric resource energy limitations are accounted for in the reliability unit commitment process. 	<p>INITIAL RESPONSE: The IESO will be providing stakeholders with a more detailed review of how other jurisdictions are managing hydro-electric resources in their day-ahead markets.</p> <p>Stakeholders can expect this information to be provided ahead of the stakeholder engagement meeting on March 28.</p> <p>UPDATE: Provided at the March 28 meeting.</p>	Closed

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DAM - Oct '17 (2)	The DAM design elements have not directly addressed energy storage resources including pump storage. OPG recommends that an additional design element be created for energy storage resources as these are unique and can't be adequately addressed in the current proposed design modules.	<p>INITIAL RESPONSE: The IESO will follow up with OPG to better understand what aspects of energy storage resources are not being addressed under the DAM design.</p> <p>UPDATE: The IESO has put in place a number of forums for identifying potential barriers to participation for non-emitting resources including the non-emitting resource subcommittee, the non-emitting resource RFI, and the Energy Storage Advisory Group (ESAG). ESAG will assist the IESO in evolving policy, rules, processes and tools to better enable the integration of storage resources within the current structure of the IESO-administered market. While potential barriers to the participation of energy storage resources are closely related to Market Renewal they do not need to be resolved within the program. The work of ESAG can proceed alongside Market Renewal and the relationship between the two will be considered as work on Market Renewal progresses.</p>	Closed
DAM - Jan '18	There are challenges when we look at translating must-offer obligations to the real-time market. Existing NUG contracts with only day-ahead must-offer obligations were designed with recognition that the security of real-time natural gas supply relies on costly services. In addition, some of these contracts are held by facilities in the northeast and northwest locations, where transmission system constraints and limited supply competitors may trigger market power mitigations. Extending must-offer obligations to real-time may have unintended consequences for these contract holders, depending on implementation.	<p>INITIAL RESPONSE: The IESO will be bringing forward secondary decisions for the must offer requirement that may recognize availability issues related to gas services.</p> <p>UPDATE: Secondary design considerations were brought forward for stakeholder review and comment at the March meeting. In response to stakeholder feedback, the IESO is no longer proposing an offer obligation in order to assess whether physical withholding has taken place. Rather, this assessment will be performed after-the-fact and will consider what factors may have caused a resource to become unavailable. This assessment applies to all participating resources, regardless of whether they are contracted or not.</p>	Closed
DAM - Jan '18	Is there any consideration of categorizing non-dispatchable embedded generation in the same context as price-responsive load with the opportunity to participate in the DAM.	<p>INITIAL RESPONSE: The IESO committed to taking those comments back and providing a response to that suggestion during the March meeting.</p> <p>UPDATE: Non-dispatchable directly connected or embedded generator participants can participate in the DAM just like PRLs - they can receive a DAM a schedule but will continue to be non-dispatchable in real-time.</p>	Closed

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ERUC - Jan '18	Slide #94 and #95 restricts the changing of non-price offer parameters in Real Time. OPG believes this should be clarified to allow for offer revisions to reflect actual unit capabilities. Restricting offer revisions to reflect unit capabilities could result in security/reliability concerns. The reasons for any changes that represent a more restrictive equipment limitation would be subject to Market Surveillance validation.	<p>INITIAL RESPONSE: Although resource capabilities can change, revisions to non-price offer parameters after commitment can undermine reliability and increase uplifts. This will be further considered by the IESO, and discussed at the meeting in March.</p> <p>UPDATE: The IESO presented a response at the March meeting: All non-price offer parameters may be updated before DAM runs for the next day. Changes post-DAM may cause inconsistency and uncertainty, except for changes to lead time. Since lead time is not used in DAM, it may be updated again after DAM clears but prior to the first run that includes all hours of the next day. It may not be updated after this point because this would cause inconsistency in PD results from hour to hour.</p>	Closed
SSM - July '17	Research and provide information on which jurisdictions publish shift factors.	After researching the matter, the IESO confirms that none of NYISO, MISO, PJM, SPP or CAISO publishes shift factors related to binding constraints.	Closed
SSM - Dec '17	<p>Similar to SSM9, OPG believes actions need to be evaluated for their true cost to minimize uplifts and should not be limited by a price cap.</p> <p>On slide 94 of the December 11 presentation, the IESO presented a list of Out of Market Operator Actions and their respective price impacts in the unconstrained sequence. While the IESO's recommendation was to assess each control action, it also stated on slide 96 that it would likely keep status quo for SSM. OPG does not agree that the list for the unconstrained sequence currently used today is appropriate for a constrained SSM sequence and is suggesting the decision be reassessed. Additionally, OPG would ask the IESO to provide the list of out-of-market actions used for the current constrained sequence.</p>	<p>INITIAL RESPONSE: As discussed at the Dec. 11, 2017 SSM meeting, the IESO has assessed each of its out-of-market operator actions in order to ensure that the actions' impact on SSM prices accurately reflect supply/demand conditions and the capability of the transmission system. In many cases, the outcome of that assessment was consistent with the status quo. There are also some cases where the IESO is suggesting a change from the current practice. These preliminary decisions will be presented in the Stakeholder meeting scheduled for March 29th, 2018.</p> <p>UPDATE: Preliminary decisions on Out-of-Market Operator Actions and related rationale were presented at the March 29th meeting.</p>	Closed

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SSM - Aug '17	We would like to see more evidence on how charging intertie transactions based on congestion charge in the pre-dispatch and the price at the intertie in the real-time constrained schedule is our preferred choice will impact prices going forward relative to current shadow pricing.	The IESO is unable to carry out the requested analysis, because the IESO does not forecast market prices. However, to provide more clarity on the approach to intertie congestion pricing (ICP) under SSM, the IESO provided further examples relating to ICP in the May 2018 Intertie Transactions webinar. Furthermore, all materials on intertie transactions that have previously been presented will be discussed during the July 2018 webinar.	Closed
SSM - Aug '17	Participants would need additional studies and scenarios on intertie congestion pricing. A sub-committee could be envisaged, considering the impact to these transactions on the market.	INITIAL RESPONSE: The IESO is further examining the different design options for this element. UPDATE: The IESO provided further examples relating to ICP in the May 2018 Intertie Transactions webinar. In July, the IESO will host an additional webinar during which all of the materials on intertie transactions that have been previously presented will be discussed.	Closed
SSM - Aug '17	AMPCO asked for additional analysis on all "Pricing for Loads" options and information from IESO in the stakeholder session on August 17.	The IESO presented additional information on this topic to stakeholders at the January 2018 meeting. Discussions with AMPCO and other stakeholders to develop final decisions are ongoing.	Closed
SSM - Aug '17	The Zonal/Uniform approach (Option 6) to Pricing for Loads is probably more complicated than Nodal/Uniform approach (Option 5), due to the low number of DLs in the province Need to review all the Zones for only a few DLs Need additional information to explain if there is an advantage of this over option 5.	INITIAL RESPONSE: The IESO will aim to provide additional information to clarify this option. This will be added to the action items tracker. UPDATE: In November 2017, the IESO presented further options and analyses relating to Load Pricing. In January of 2018, preliminary decisions and related rationale were presented to stakeholders.	Closed
SSM - Dec '17	The Preliminary Decision commentary on slide 55 and Slide 69 are not consistent with RTD method 2 being \$60	INITIAL RESPONSE: The IESO has reviewed the scenarios provided in the December materials and will provide further clarity to show how the results are consistent with method#2. UPDATE: The IESO published an updated slide deck to provide further clarity on how the results reached are consistent with method #2. A further example was also explored in example 1, case B (slide 12) of the May 2018 presentation.	Closed

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SSM - Dec '17	The examples provided in the intertie congestion pricing section of the slide deck do not provide enough information for us to understand the impacts of the two methods.	<p>INITIAL RESPONSE: The IESO will revise the examples to provide greater detail regarding the pricing mechanics of both methods.</p> <p>UPDATE: The IESO provided further examples relating to ICP in the May 2018 Intertie Transactions webinar. In July, the IESO will host an additional webinar during which all of the materials on intertie transactions that have been previously presented will be discussed.</p>	Closed