



L'Orignal 2019-04-29

To Whom it may concern,

Ivaco Rolling Mills has been an active market participant in the Operating Reserve market as a Dispatchable Load (DL) since market opening in 2002. We thank the IESO for the opportunity to comment on the Improving Accessibility to Operating Reserve stakeholder engagement plan.

On page 24 on the presentation it was noted that on average DL and generators are underdelivering on OR activations by 25% and 13% respectively. For DL it is important to note two issues that may have a bearing on this discussion.

*Exemptions granted to Batch Type Processes for compliance to dispatch.*

At the start of the market in 2002, it was recognized that former sources of operating reserve utilized by Ontario Hydro would be ineligible to provide OR under the new market rules. A working group of IMO staff and Demand Dispatch Service (DDS) loads was struck to understand how loads could become eligible for fuller participation in the market. As a result of this work, DL's were able to participate in the OR market.

*Impact of IESO inability to de-rate Dispatchable Loads within the dispatch hour*

The presentation refers to non compliance of both generators and loads as a source of inaccessible OR. One difference between generator and load non compliance to dispatch is the ability of generators to de-rate their capability within the dispatch hour, and the inability of DL to do the same. This means that generator non compliance to energy and OR dispatch on an interval by interval basis is naturally capped by the length of time it takes to phone the IESO operator and have them implement an outage slip in the tools.

Dispatchable Loads on the other hand, are required to manage changes to capability through their energy bids and OR offers. This means that an equipment issue that arises early in an hour persists until the next dispatch hour. Efforts to update the IESO tools in past to overcome this deficiency have not been implemented (e.g. Facility Outage Management System). Dispatchable Load market participants and AMPCO have raised this as an issue at the Market Renewal Project as a priority, but so far we have not seen an undertaking on the part of the IESO to include this fix in the project design.

Ivaco recommends that the IESO ensure any analysis and solutions presented to stakeholders for this engagement effort include consideration for these two factors, and we welcome the opportunity to continue to discuss this issue with IESO staff.

As a final note, since Market Open, beside one instance of a dispatch tools problem, Ivaco responded successfully to every ORA issued by the IMO/IESO.

Again, Ivaco looks forward to continue the discussion and thanks you for this engagement.

Best Regards,

A handwritten signature in blue ink that reads "François Abdelnour". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

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