

Single Schedule Market Pricing Issues

Phase 2 – Session 1 – Price Formation Options

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Topic Schedule - Fundamentals

- **June 2, 2017 - Stakeholder Engagement Session**
 - ✓ Module A - Energy Pricing
 - ✓ Module B - Reserve Pricing
 - ✓ Module C - Constraint Violation Penalties
 - ✓ Module D - Multi-interval Optimization and Pricing
 - ✓ Module E - Pricing Operating Restrictions and Operator Actions
- **June 29, 2017 - Stakeholder Engagement Session**
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1. Energy Price - Congestion Component

The IESO currently does not take account of congestion in calculating the uniform price:

- The current settlement price does not include a congestion component
- The shadow prices calculated in the IESO's constrained schedule include a congestion component

Including the cost of congestion in prices is a foundational feature of a single schedule market. There is only one viable option for this design element:

1. Include the cost of congestion in prices

Congestion Component

Other ISOs

	Congestion in Prices
PJM	Yes, since 1998
New York ISO	Yes, since 1999
ISO New England	Yes, since 2003
MISO	Yes, since 2005
SPP	Yes, since 2007
California ISO	Yes, since 2009
ERCOT	Yes, since 2010
Western EIM	Yes, since 2014
Mexico	Yes, since 2016

The benefits of including the congestion component in settlement prices include allowing the IESO:

- To provide an efficient price signal for the development and performance of resources able to help the IESO efficiently manage variations in intermittent resource output
- To implement new market design features that would help the IESO more efficiently manage variations in intermittent resource output
- Simplify settlements
- Reduce unwarranted out-of-market uplift payments
- To implement a day-ahead market

2. Energy Reference Price

In a SSM, the only decision with regard to the energy reference price component is the specification of the reference location.

- The locational marginal price (LMP) at a location does not depend on the choice of the reference location
 - A change in the reference location will only affect the three components of price - not the total LMP price
- The IESO currently utilizes the Richview location as the reference location in the constrained schedule
- There is no reference location in the unconstrained schedule because it does not consider dispatch of the actual transmission grid

There are two main options for defining the reference location:

1. Continue to use Richview as the reference location
2. Use some other reference location

Energy Reference Price

Other ISOs

ISO	Reference Location	Vendor
PJM	Distributed Load	Alstom
New York ISO	Marcy/Tennessee	ABB
ISO New England	Distributed Load	Alstom
MISO	Distributed Load	Alstom
SPP	Distributed Load	Alstom
California ISO	Distributed Load	Siemens
ERCOT	Comanche Peak	ABB

Richview was originally chosen as the reference location because it is well connected to most parts of the province and because of its proximity to Ontario's major load centre.

- Risk of experiencing unanticipated performance issues with using a new location

3. Energy Price - Loss Component

The current IESO prices do not reflect the cost of incremental losses in meeting load at each location.

The constrained schedule used to actually operate the Ontario transmission system does take account of the cost of incremental losses in dispatching generation at each location and this cost is reflected in the energy market shadow prices calculated in the constrained schedule.

There are three broad approaches Ontario could use to take account of the cost of marginal losses:

1. Include the cost of marginal losses in the dispatch but exclude this cost from prices (status quo)
2. Exclude the cost of marginal losses from prices and from the dispatch
3. Include the cost of marginal losses in both the dispatch and prices

Loss Component

Other ISOs

	Marginal Losses in Prices
New York ISO	Yes, since 1999
ISO New England	Yes, since 2003
MISO	Yes, since 2005
PJM	Yes, since 2007
SPP	Yes, since 2007
California ISO	Yes, since 2009
ERCOT	No, but under discussion

Retain the current design in which the real-time schedule takes account of the cost of marginal losses but settlement prices do not.

- This option would entail retaining a two schedule pricing design and would presumably include CMSC payments to take account of the difference between prices and dispatch instructions

Shift to a design in which the cost of marginal losses is not taken into account in either the economic dispatch or in prices. This option would:

- Not require CMSC payments since the dispatch instructions would be consistent with prices
- Increase the cost of meeting load
- Require changes in the design and implementation of the constrained schedule software

Continue to take account of the cost of marginal losses in the real-time economic dispatch and include the cost of marginal losses in settlement prices. This option would:

- Minimize the cost of meeting load and not require CMSC to account for losses
- Improve the efficiency of market price signal and reduce uplift
- Be consistent with the IESO's current constrained schedule and is best practice among ISOs coordinating single schedule markets

Loss Component

Another consideration related to losses is whether the IESO should continue to dispatch the system using static loss factors for the initial SSM implementation or should shift to more dynamic loss factors for SSM implementation.

Loss Component

Other ISOs

	Dynamic Losses	Calculation Frequency
New York ISO	Yes	5 minutes
PJM	Yes	5 minutes
ISO NE	Yes	5 minutes
MISO	Yes	5 minutes
SPP	Yes	5 minutes
CAISO	Yes	5 minutes
ERCOT	n.a.	n.a.

4. Ex Post vs. Ex Ante Pricing

Ex Post pricing designs use information that was not available at the time dispatch instructions were sent to calculate settlement prices.

- The IESO currently utilizes a form of ex post pricing to calculate prices in the unconstrained schedule

Ex Ante pricing designs use prices calculated based on the dispatch and hence only use information that was available at the time dispatch instructions were sent to calculate settlement prices.

- The energy shadow prices calculated in the IESO constrained schedule are ex ante prices

There are two options relating to ex ante and ex post pricing:

1. Ex Post pricing (status quo)
2. Ex Ante pricing

	Uses Ex Post Pricing?
PJM	Yes
New York ISO	No
ISO New England	No ¹
MISO	No ²
SPP	No
California ISO	No
ERCOT	No

1. ISO New NE switched to Ex Ante pricing April 2015.
2. MISO switched to Ex Ante pricing early 2009.

Ex Post Pricing:

- Useful if ISO does not have sophisticated dispatch software, which is not relevant to IESO
- Complex to implement in a way that does not lead to pricing anomalies
- Past implementations have sent inefficient price signals during reserve shortages or ramp constrained periods

Ex Ante Pricing:

- Consistent with the IESO's current constrained schedule
- Is considered best practice
- Avoids sending inefficient price signals during reserve short or ramp constrained periods

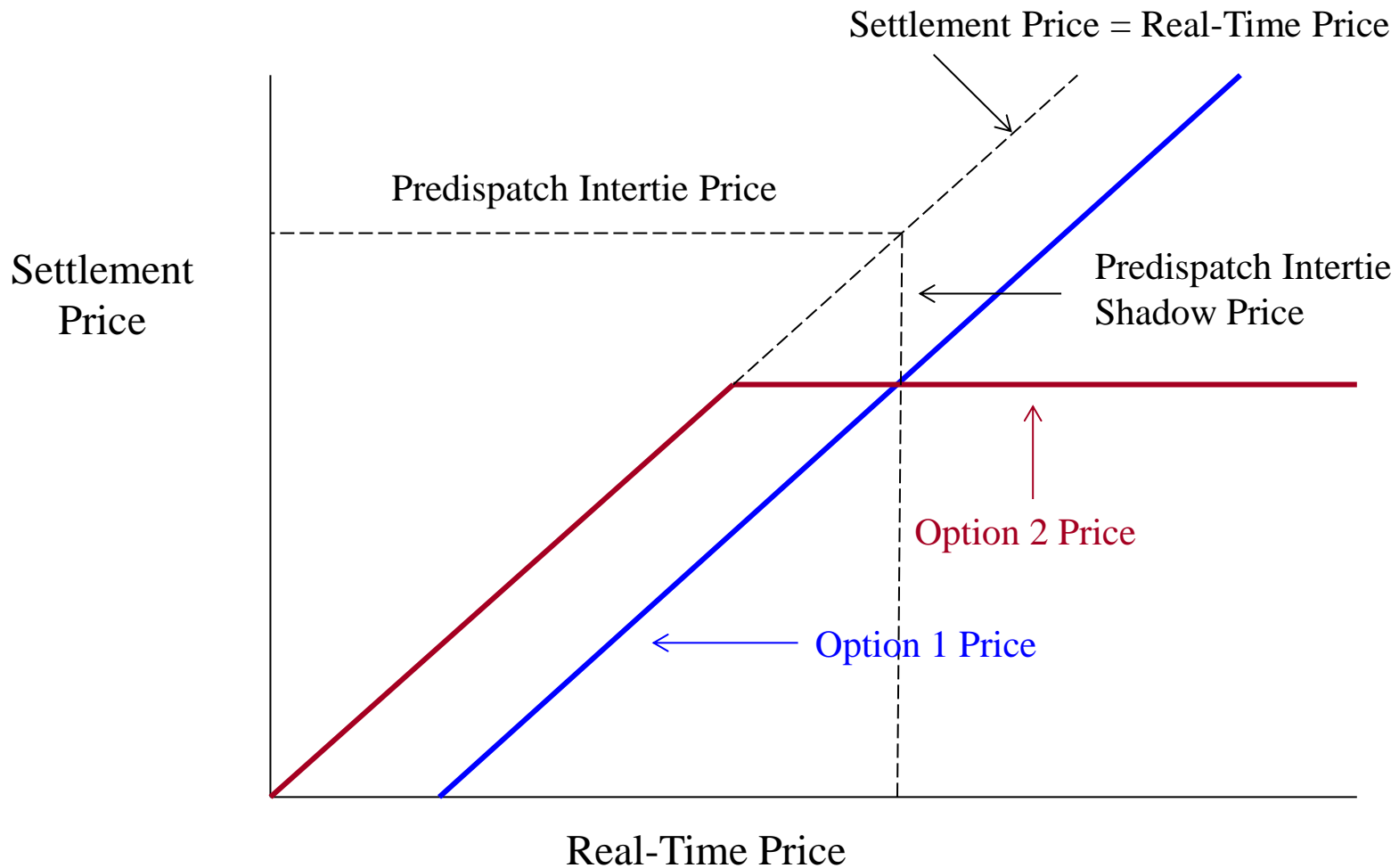
5. Intertie Congestion Pricing

The IESO currently utilizes the congestion charge in the unconstrained pre-dispatch for intertie congestion pricing.

- The intertie congestion charge in the unconstrained pre-dispatch (which includes intertie constraints) is added to the real-time MCP (a five-minute dispatch price) to determine the settlement price for imports and exports at each relevant intertie
- Intertie congestion costs are not reflected in either the constrained or unconstrained 5 minute dispatch price because intertie schedules are fixed during a given hour
- No shadow prices are currently calculated for real-time intertie schedules in the constrained dispatch

There are two possible approaches to intertie pricing in the near-term for SSM:

1. Charge intertie transactions based on the congestion charge in the *constrained* pre-dispatch and the price at the intertie in the real-time *constrained* schedule (similar to status quo)
2. Charge intertie transactions based on:
 - The real-time schedule price if there is no congestion
 - When export constrained - the higher of the nodal price in real-time or pre-dispatch
 - When import constrained - the lower of the nodal price real-time or pre-dispatch price



Intertie Congestion Pricing

Under option 1, the intertie settlement price will be equal to the real-time intertie price less the intertie shadow price in the pre-dispatch. (the example assumes the intertie is import congested)

Under option 2, the intertie settlement price will be equal to the pre-dispatch price if the real-time price is higher.

In the longer-term, the IESO might choose to implement a Coordinated Transaction Scheduling (CTS) design with the New York ISO and/or MISO, using pricing rules agreed upon with those ISOs. Such a design would:

- Presumably be similar to the New York ISO's current pricing rules with PJM and ISO New England
- Add $\frac{1}{2}$ of the congestion component in the scheduling process to the real-time price in the exporting balancing area
- Subtract $\frac{1}{2}$ of the congestion component in the scheduling process to the real-time price in the importing balancing area

	Price Intertie Congestion in Real-time?	Coordinated Transaction Scheduling
New York ISO	Yes	PJM, ISO-NE
PJM	No	NYISO, MISO Fall 2017
ISO NE	No	NYISO
MISO	No	PJM Fall 2017
SPP	No	No
CAISO	Yes	2014
ERCOT	No	No

Options for changes in intertie congestion pricing need to be evaluated in conjunction with changes in intertie scheduling that will be considered in other work streams:

- Implementation of a single schedule market would enable the IESO to implement any of the designs described above
- All of these designs would require the IESO to calculate shadow prices at the interties in the constrained dispatch

6. Energy Pricing for Suppliers

The IESO currently pays suppliers based on the uniform market clearing price (MCP).

Constrained-on and constrained-off payments compensate suppliers for differences between their theoretical (unconstrained) and actual (constrained) schedules.

There are two options for paying suppliers for energy:

1. Zonal Prices
2. Nodal Prices

	Generator Pricing Design
PJM	nodal since 1998
New York ISO	nodal since 1999
ISO New England	nodal since 2003
MISO	nodal since 2005
SPP	nodal since 2007
California ISO	nodal since 2009
ERCOT	nodal since 2010

Shift to a **zonal** pricing system, with somewhat reduced levels of constrained on and off payments. Choosing this option would:

- Reduce - but not eliminate - the inefficiency and uplift costs associated with the current design
- Continue to handicap the IESO in:
 - Accommodating higher levels of intermittent resources
 - Implementing potential improvements, such as a day-ahead market, coordinated intertie scheduling and/or ramp capability dispatch
- Mean shifting to a design that other ISOs (California and ERCOT) have abandoned in recent years

Shift to the **nodal** LMP pricing design used by all other ISOs with single schedule market designs. Choosing this option would:

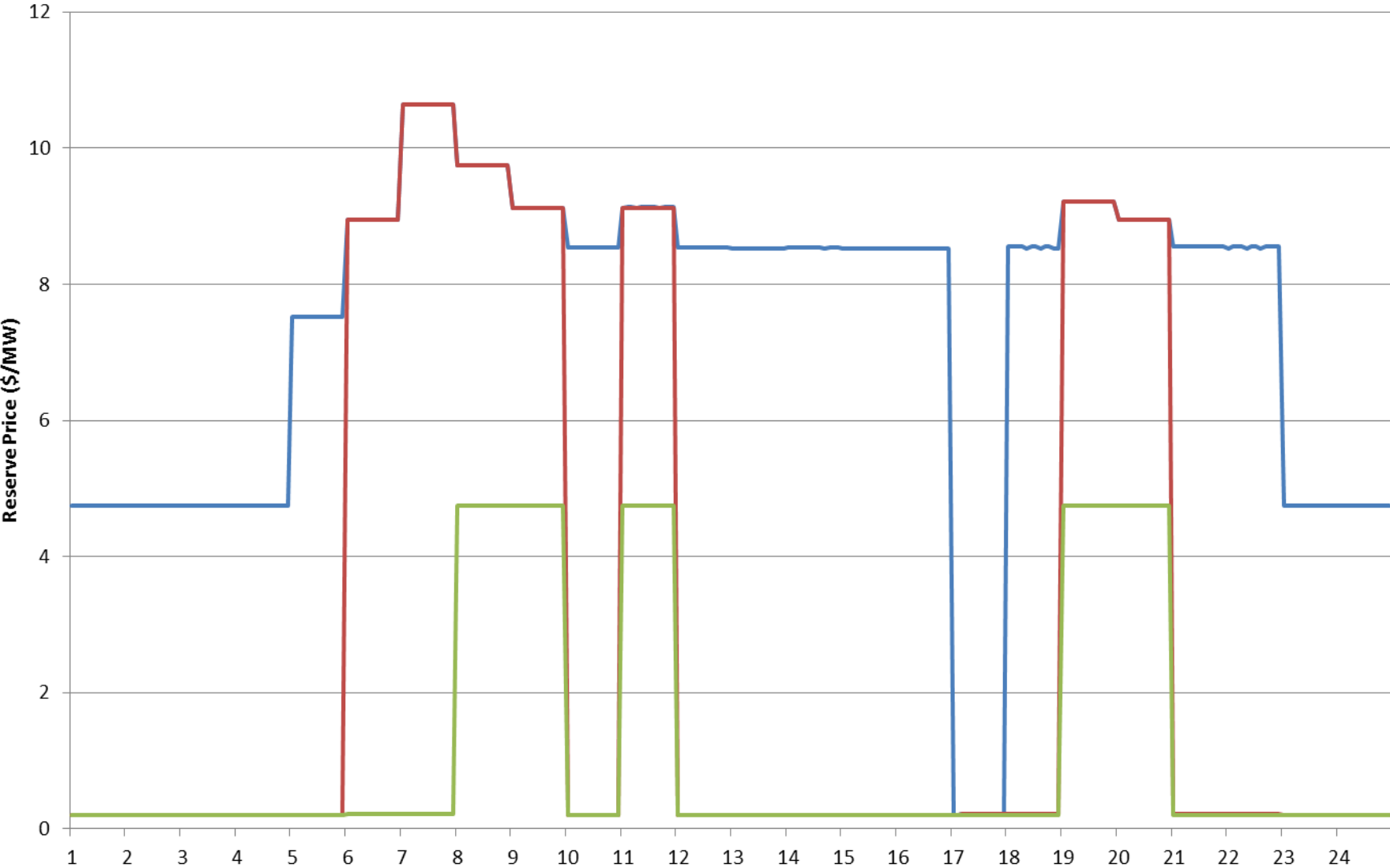
- Improve market efficiency and reduce uplift costs
- Aid the IESO in accommodating higher levels of intermittent resource output by providing spot market incentives for resources able to provide the required flexibility
- Also allow potential future improvements, such as implementing a day-ahead market, coordinated intertie scheduling and/or ramp capability dispatch, that require single schedule pricing for their implementation

7. Operating Reserve Reference Price

Both the IESO unconstrained and constrained schedule simultaneously optimize and price energy and operating reserves in real-time.

IESO Real-Time Reserve Prices

March 8th, 2017



— 10 Min - Synchronized — 10Min- Non Synchronized — 30 Minute Reserve

There is one option:

1. Co-optimize energy and operating reserve (status quo)

The IESO's current design is best practice for SSM markets.

There is no reason to spend resources developing less efficient alternatives.

	Simultaneous Optimization of Reserves and Energy in Real Time Dispatch
New York ISO	Yes – since 2005
ISO New England	Yes – since 2006
MISO	Yes – since 2009
PJM	Yes – since 2012
SPP	Yes – since 2014
California ISO	Not in 5 minute dispatch; Partly in 15 minute market; considering implementing in 5 minute dispatch and fully re-optimizing in 15 minute market
ERCOT	No

8. Operating Reserve Price - Congestion Component

The IESO currently pays a uniform price for operating reserve.

- Constrained-on and constrained-off payments compensate for differences between the uniform prices and actual offer/opportunity costs of real-time operating reserve schedules

The IESO's constrained schedules for operating reserves and energy reflect industry best practice.

- Co-optimizes the dispatch of energy and scheduling of operating reserves in real-time, while enforcing locational minimum and maximum operating reserve constraints across the province

Similar to the choice to include congestion costs in the energy price, there is really only one option for operating reserve congestion pricing:

1. Include the cost of congestion

Ignoring locational reserve constraints in the constrained schedule is not a feasible option because most of these constraints represent reliability obligations or have been implemented to better maintain reliable electric system operations in Ontario.

Operating Reserve Price - Congestion

Other ISOs

	Multiple Reserve Zones	Nested Zones	Locational Reserve Pricing
New York ISO	Yes	Yes	since 2002
PJM	Yes	Yes	since 2005
ISO New England	Yes	Yes	Yes
MISO	Yes	Yes	Yes
SPP	No	N.A.	No ¹
California ISO	Yes	Yes	Yes
ERCOT	No	N.A.	No

1. SPP market rules provide for zonal reserve prices if they are needed. Five Zones were enforced from May 2014 until September 2014 when transmission expansions eliminated the need for the Zonal targets.

Shift to a design in which operating reserves are settled based on locational prices for reserve zones, so are generally consistent with operating reserve schedules. This option:

- Will reduce or eliminate inconsistencies between operating reserve schedules, offer prices and clearing prices that are currently resolved with CMSC payments
- Will provide a more efficient price signal for investments that would allow demand side and storage resources to provide reserves in higher priced regions

Reserve shadow (congestion) prices are currently produced with the IESO constrained schedule

- Consistent with design in most other ISO single schedule markets

9. Constraint Violations

Constraint Violation Penalties

Background

The IESO uses constraint penalty prices in its constrained and unconstrained schedules. The magnitudes determine the priority for observing the different constraints. Below is a sample of such prices.

Violation	Penalty Violation Cost
Control Action Operating Reserve	\$30/MW
Total Reserve Requirement	\$6,000/MW
10-Minute Total Reserve Requirement	\$10,000/MW
10-Minute Spinning Reserve Requirement	\$12,000/MW
Energy Balance	\$30,000/MW
Import/Export Scheduling Limit or Net Interchange Scheduling Limit	\$40,000/MW
Security Transmission Limit (Base case or Contingency)	\$60,000/MW

These penalty prices are currently reflected in constrained schedule shadow prices when the constrained schedule is not able to observe these constraints.

The IESO has three basic options for applying constraint violation pricing, with a few additional choices for how some of the options would be implemented.

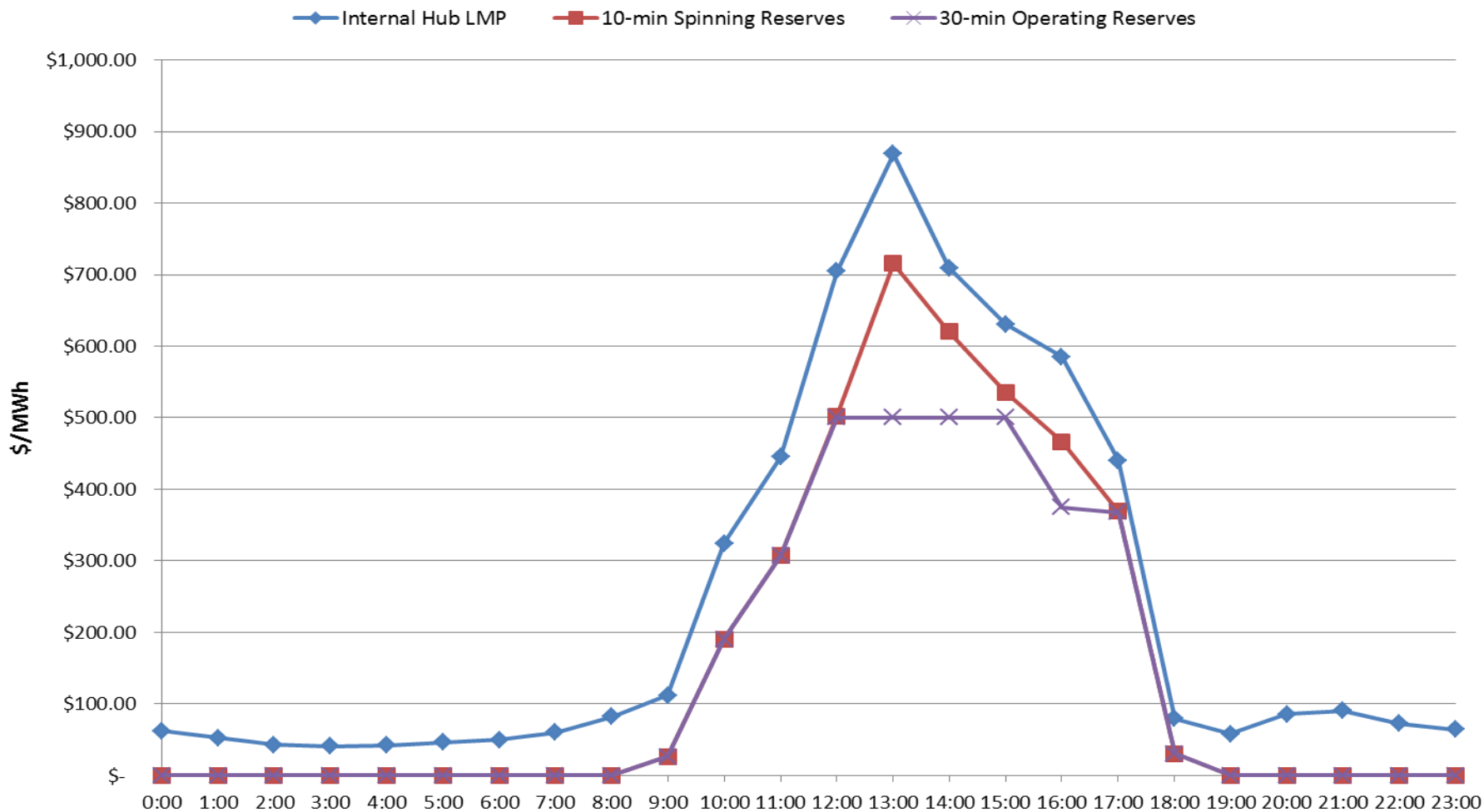
- The constraints referred to in this section are associated with operating reserve shortages and transmission limits
- Under all of these options, operating reserve and energy prices would continue to be capped at \$2,000/MWh
 - There would be a potential for some inconsistencies between energy and reserve prices when the price cap was binding
- The IESO could implement different options for operating reserve pricing than for transmission constraint pricing

1. Apply current penalty prices in dispatch, but use ‘relaxation’ and other adjustments for pricing (status quo)
2. Use the same set of penalty prices for both dispatch and pricing
 - a) Use current penalty prices
 - b) Create new penalty prices (hierarchy needed)
 - c) Create a demand curve for penalty prices
3. Apply current penalty prices in dispatch, but use a different set of penalty prices in pricing
 - a) Create new penalty prices (hierarchy needed)
 - b) Create a demand curve for penalty prices

All system operators utilize penalty prices of these types in their dispatch software:

- ISOs operating single schedule markets have evolved away from using arbitrarily large penalty prices and towards choosing penalty values that are consistent with the cost (“reliability value”) of actions the ISO would take to resolve those conditions
- Costs that should be incurred to resolve violations have historically been reflected in the type of in-market/out-of-market actions taken by operators
- Increasing need to make complex dispatch and commitment decisions in software systems makes it important to pre-determine appropriate penalty prices for use in these systems

ISO-NE Internal Hub LMP and Rest of System Reserves, 7/19/2013



Note: Reserve Prices presented are for the Rest of System reserve zone.

Sources: ISO-NE Final Real-Time LMPs and Final Hourly Reserve Zone Prices and Designations: http://www.iso-ne.com/markets/hst_rpts/hstRpts.do?category=Hourly

Constraint Violation Penalties

Other ISOs -- Reserves

	Reserve Penalty Factors Can Set Prices
PJM	real-time
New York ISO	Day-ahead and real-time
ISO New England	real-time
MISO	day-ahead and real-time
SPP	day-ahead and real-time
California ISO	day-ahead and 15 minute
ERCOT	real-time

Most ISOs employing SSM pricing have evolved first towards using transmission violation penalty prices in the real-time dispatch and then towards using transmission violation demand curves in the real-time dispatch.

- Most system operators utilize transmission margins in dispatching the system, so that the actual reliability limit is not exceeded when the transmission constraint first binds or for small overloads

Constraint Violation Penalties

Other ISOs-Transmission

	Transmission Constraint Penalties Set Price	Multiple Penalties for Constraint Types ¹	Multiple Penalties for Overloads ²
New York ISO	Yes	No	Yes
PJM	No	N.A.	N.A.
ISO New England	No	N.A.	N.A.
California ISO	Yes	No	No
MISO	Yes	Yes	Yes
SPP	Yes	No	Yes

1. These designs have transmission penalty factors that vary by line voltage and between system operating limits and interconnection reliability operating limits.
2. These designs have multiple penalty factors for a given constraint that vary with the amount of the overload.

The trend in other single schedule market ISOs is therefore to utilize penalty prices that both cause the ISO software systems to make appropriate decisions from the standpoint of both economics and reliability and to flow these penalty prices through into settlement prices to provide efficient incentives for market participants to respond to these prices.

Utilize the penalty prices currently implemented in the constrained schedule, but relax violated constraints and determine settlement prices based on incremental energy and/or operating reserve offer prices.

- Current penalty prices may exceed the reliability value of respecting constraints leading to commitment decisions that are more expensive than other manual operator actions that could be taken to resolve the constraint
- The use of constraint relaxation to calculate prices can lead to:
 - Settlement prices that are too low to incent efficient actions in response to violations
 - Settlement prices that exceed the reliability value associated with a particular violation, raising cost for consumers

Utilize penalty prices currently implemented in the constrained schedule and allow them to flow through into settlement prices.

- Current penalty prices may exceed the reliability value of respecting constraints leading to commitment decisions that are more expensive than other manual operator actions that could be taken to resolve the constraint violation
- If these penalty prices were reflected in settlement prices, subject to the \$2,000 price cap, the settlement prices may cause generators and dispatchable or price responsive loads to take actions whose cost exceeds the reliability value associated with a particular violation

It should be kept in mind that although transmission constraint penalty prices would be set at \$60,000/MWh, the price impact at any location would be proportional to the impact of that location on the binding transmission constraint.

The calculated price could be:

- below the price cap at locations with low impact on a constraint
- well above the price cap at locations with large impacts on a violated constraint

Develop a new set of penalty prices that would be used both in dispatch and pricing.

- These penalty prices could be set at levels that would produce commitment results inline with the reliability value of respecting constraints and result in settlement prices that would incent efficient actions in response to violations
- The IESO and stakeholders would need to develop an initial set of penalty prices. These penalty prices could be modified from time to time as operating practices and challenges evolve

Utilize penalty prices currently implemented in the constrained schedule to determine the commitment and dispatch, but develop a different set of penalty prices that would be used to determine settlement prices.

- Current penalty prices may exceed the reliability value of respecting constraints leading to commitment decisions that are more expensive than other manual operator actions that could be taken to resolve the constraint violations
- Settlement prices based on a lower set of penalty prices could at times result in additional uplift costs when IESO software made commitment decisions based on the current penalty prices

- The penalty prices in the pricing pass could be set at levels that would incent efficient actions in response to constraint violations
- The IESO and stakeholders would need to develop an initial set of penalty prices to use in pricing. These penalty prices could be modified from time to time as operating practices and challenges evolve
- These constraint penalty prices could be set either at single values or as demand curves with different penalties for varying levels of violations

10. Out-of-market Operator Actions

IESO operators may take a number of actions to maintain electric system reliability during shortage conditions.

These actions include:

- Voltage reductions
- Export curtailments
- Emergency imports/exports.

Other operator actions that can be taken to maintain local electric system reliability that could impact prices include:

- Supplying emergency curtailable exports to adjacent control areas that are counted as Ontario operating reserves
- Curtailing imports during low load conditions
- Committing resources out of merit to provide voltage support, operating reserves or address area control error
- Committing resources out of merit for transmission security
- Constraining off energy limited resources in order to be able to meet load later in the operating day

The basic options are whether to allow some or all of these operator actions to set market prices in some circumstances:

1. Control actions are priced at maximum MCP or some other level, for one or more of the following:
 - a) Voltage reductions
 - b) Curtailment of exports for adequacy
 - c) Scheduling of emergency imports
2. Control actions are not priced

All of these options interact with the design for operating reserve shortage pricing as some would only be taken if there were also a significant shortage of operating reserves.

Pricing Of Operator Actions

Other ISOs

	Voltage Reductions Set Price	Export Curtailments Set Price	Emergency Imports Set Price
PJM	Yes	No	Yes
New York ISO	No	No	No
ISO New England	No	No	No
MISO	No	No	No
SPP	No	No	No
California ISO	No	Yes in FMM	No

Voltage reductions set price at the price cap or some other level.

- Reflecting the need for voltage reductions in real-time prices would provide an additional signal for generation and load resources to take actions to increase generation and reduce load
- This could result in discrepancies between the dispatch and prices but this is very unlikely as voltage reductions would only be taken when there are significant reserve shortages, so all resources should be scheduled either for reserves or energy
- This would require some changes in constrained schedule or implementation of a pricing pass.

Curtailment of exports in the pre-dispatch sets prices at the cap or at some other level.

- This would provide a stronger price for generation and load resources to take actions to increase generation and reduce load
- If the export curtailments eliminated reserve shortages, setting prices at the price cap would create inconsistencies between the dispatch and prices in which some resources would not be scheduled or compensated to provide either reserves or energy despite high prices

Intra-hour curtailment of exports sets prices at the cap or at some other level.

- This would provide a stronger price for generation and load resources to take actions to increase generation and reduce load
- This could result in discrepancies between the dispatch and prices but this is very unlikely as intra-hour curtailments would likely only be taken when there are significant reserve shortages so all resources would be scheduled either for reserves or energy
- This would require some changes in constrained schedule or implementation of a pricing pass

Scheduling of emergency imports sets prices at the cap or at some other level.

- This would provide a stronger price for generation and load resources to take actions to increase generation and reduce load
- This could result in discrepancies between the dispatch and prices but this is unlikely as emergency imports would likely only be scheduled when there are significant reserve shortages so all resources would be scheduled either for reserves or energy
- This would require some changes in constrained schedule or implementation of a pricing pass and rules to determine when it would cease to be applied as load fell and the imports were no longer needed

Not reflecting operator actions in prices would:

- Not provide an additional signal for generation and load resources to take actions to increase generation and reduce load
- Not require any changes in constrained schedule or introduction of a pricing pass
- These operator actions are rarely used, but the value of load reductions from the additional price signal may be very high.

11. Multiple Interval Optimization

The IESO currently utilizes multiple interval optimization based on five critical periods to determine generator and dispatchable load schedules in the constrained schedule.

- However, the unconstrained prices that are used for settlements are based on a single interval dispatch

There are two basic options relating to multiple interval optimization:

1. Use multiple interval optimization to determine schedules but not prices (similar to status quo)
2. Use multiple interval optimization to determine schedules and prices

	Use MIO ¹
PJM	No
New York ISO	Yes, since 2005
ISO New England	No
MISO	No
SPP	No
California ISO	Yes, since 2009
ERCOT	No

1. Use multi-interval optimization for dispatch and in setting prices.

Use multiple interval optimization to determine physical schedules but use single interval optimization to determine prices.

- Similar to current design with respect to multi-interval pricing but SSM pricing would take account of actual ramp rates, transmission congestion and minimum load blocks in calculating prices as well as constrained schedules
- Preserves benefits of multiple interval optimization
- Potential for inconsistencies between dispatch and prices

Use multiple interval optimization both to determine physical schedules and to determine prices.

- Preserves benefits of multiple interval optimization
- Reduced potential for inconsistencies between dispatch and prices

12. Price Setting Eligibility

When determining the MCP in today's unconstrained schedule the following operating restrictions are eligible for partial scheduling and can set the unconstrained price:

- Minimum load blocks of on-line internal resources
- Minimum load blocks of off-line quick start resources (5-minute dispatch time frame)
- Forbidden regions

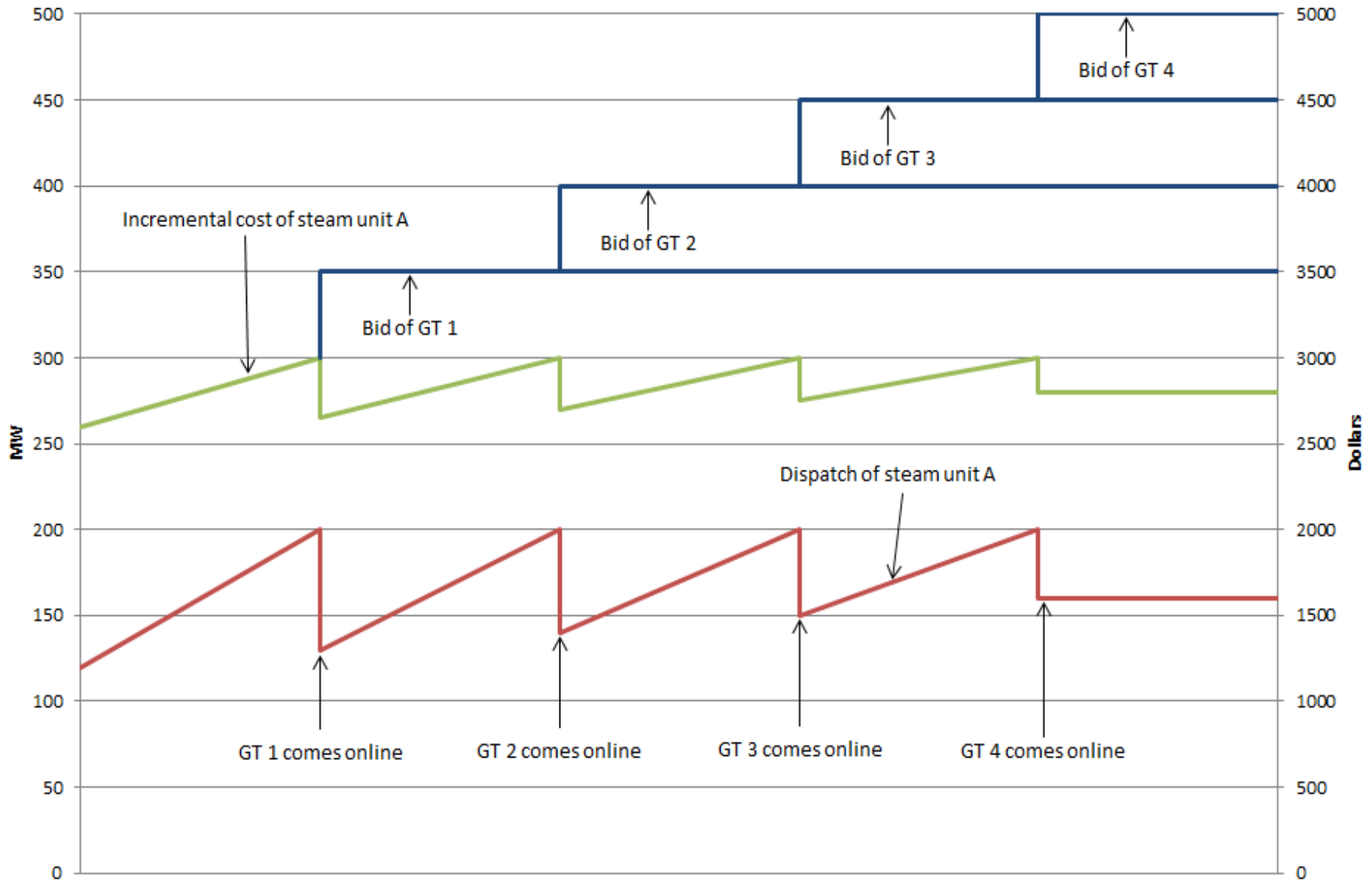
In the unconstrained schedule the following operating restrictions are not eligible for partial scheduling and cannot set the unconstrained price:

- Interchange transactions
- Operating ranges scheduled to provide regulation

There are two core options:

1. Do not allow any resources' restricted MW's (e.g. minimum loading point) to set or impact price (status quo in the constrained schedule)
2. Allow fast start online resources' restricted MW's to set or impact price

ILLUSTRATION OF NYISO HYBRID PRICING



Operating Restrictions

The ‘hybrid pricing’ design in New York ISO was motivated by a desire to send an efficient price signal when fast-start gas turbines (with minimum loading points) are committed to meet incremental load near real-time.

- NYISO allows fast-start gas turbines to set price, so long as they are marginal and not simply still online because of minimum run-time considerations (hence the name ‘hybrid’)
- Average cost offers (inclusive of speed-no-load but not start up costs) are used by the NYISO to set the price in these situations
- Intended to provide a more efficient price signal and reduce uplift
 - Better signals for intertie transactions and price-responsive load

	Allow on-line fast-start unit to Set Price?
New York ISO	Yes
PJM	Rarely
ISO New England	Yes
MISO	Yes
California ISO	Rarely
SPP	No
ERCOT	No

Because suppliers with operating restrictions cannot necessarily increment or decrement their output one megawatt at a time, their physical dispatch can cause discrete changes in the dispatch points of other resources.

- A common situation is that a gas turbine with an minimum loading point, generally one which can be committed and started-up quickly close to real-time, may be needed on the margin to serve load
 - For example, if only 30 MW of a unit with an minimum loading point of 80 MW is needed to meet incremental load, then another, less costly, supplier(s) must reduce its output by 50 MW

When an operating restriction results in a discontinuous physical dispatch on the margin, the SSM pricing run rules must explicitly address how this will be taken into account in calculating prices, taking the physical commitment and dispatch as optimal.

- Continuing the prior illustration, if 30 MW of a unit with a minimum loading point of 80 MW is part of the least-cost dispatch, should the price be
 - The average offer cost of the unit's minimum loading point output? This unit was committed because its output was needed to serve load at least cost; OR
 - The incremental offer cost of the cheapest supplier whose dispatch was reduced to accommodate the extra 50 MW of the block-loaded unit's output? This is the incremental offer cost to serve the next MW of load.

Utilize price setting rules consistent with the calculation of shadow prices in the constrained schedule:

- This approach would not require changes in the prices determined by the constrained schedule
- This approach could at times set prices that would be inconsistent with the commitment of fast starting resources with MLP's (Ontario currently has few such resources)

The rules for whether and when the minimum load blocks of on-line units may set price under SSM will need to take into account:

- The capabilities of the commitment models the IESO runs close to real-time
- The variability of net load
- The time step for interchange scheduling