

Feedback Form

Adjustments to Intertie Flow Limits – Nov 22, 2021

Feedback Provided by:

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Topic	Feedback
Slide 6	<ol style="list-style-type: none"> 1) Slide 6 states “imports were often constrained-on solely to offset export transactions”, which generated additional CMSCs. What features identify that an import was constrained on solely to offset export transactions? 2) How often were imports constrained-on solely to offset export transactions prior to August 23rd? 3) Please identify the dollar value of the additional CMSCs that “did not benefit the ratepayer.” OPG feels this information is important to understanding the rationale for the proposed amendments, especially since the IESO expects the issue to be partially resolved in Q1, 2022, and fully resolved under Market Renewal. 4) Has the IESO seen a material change in the volume of CMSCs in the Northwest (credited to either imports or generators) since it applied the new intertie limit methodology in August?
Slide 7	<ol style="list-style-type: none"> 5) The slide describes the rule change as a clarification of the following statements: <ul style="list-style-type: none"> • Internal transmission constraints are considered when setting intertie flow limits. • Those limits are applied in the unconstrained and constrained schedule. • Those limits apply “to or from” intertie zones, consistent with the mathematical constraints in the DSO. <p>Please explain where in the Market Rules and Manuals the IESO believes these statements are implied and why they warrant clarification.</p> 6) Please identify any additional flexibility, security, or efficiencies the proposed amendments will grant the IESO and the electricity market. If the amendment allows the IESO any additional authorities beyond clarification, OPG proposes that: <ul style="list-style-type: none"> • a sundown clause is added (e.g., Q2 2022), and • the amendment is limited to the affected interties in the Northwest. 7) Was the IESO aware, prior to August 23rd, that the Market Rules allowed them to consider internal transmission constraints when setting intertie flow limits for the unconstrained schedule? If so, what was the reason the IESO declined to exercise this authority prior to August 23rd?
Slide 10	<ol style="list-style-type: none"> 8) The slide references the equation in Appendix 7.5 s.6.4.4 as evidence that the unconstrained schedule already imposes limits on energy scheduled “to or from” intertie zones. Please explain how the equation proves this.

General Comments/Feedback

OPG appreciates the IESO’s efforts to provide clarity on their interpretation of the Market Rules. OPG is unsure of the value of the amendment, however, given that the IESO believes its actions since August 2021 have been in line with the Market Rules. At present, OPG is unable to verify the IESO’s

claim, but hopes that the IESO's responses to the above questions will provide clarity. Ultimately, though, we think participants would benefit greatly from a more detailed explanation of the IESO's interpretation of the existing rules, and of why the amendment is necessary.