

IESO Engagement

From: Heather Sears
Sent: September 21, 2023 3:53 PM
To: IESO Engagement
Subject: MRP Implementation - Settlements - September 21, 2023 Feedback

Good afternoon,

No feedback form is currently linked, so I am submitting my feedback by email. This echoes the comments that were made during the session this morning and is really a comment for Shirly Gu and Denise Myers to consider.

Comments re: OR Accessibility MRP Implementation Proposal for GOG Resources. In this morning's session, IESO proposed an approach to align the current OR accessibility calculations to the RT MWP and RT GOG calculations in the updated MRP framework.

The challenge for GOG Resources that utilize the pseudo-unit model is that the assigned OR capacity to each of its physical resources is done by formula, not by available OR. This will present a challenge whereby the allocation of OR from PSU to PU may assign inaccessible OR to an STG by formula. A clawback will be calculated on the STG, without the opportunity to assign the inaccessible STG OR to an associated GT, which otherwise has too low of an allocation.

For example, consider a 1x1 PSU made up of a 100 MW GT and a 50 MW STG.

- The MLPs are 60 MW and 30 MW.
- The Pseudo-unit has a 90 MW MLP and 150 MW baseload. There are 60 MW of OR available.
- The PSU offers the 150 MW of energy and holds 60 MW of OR to align with capability.
- OR GT ramp rate is 5 MW/min. STG ramp rate is 0.5 MW/min.
- STG, by nature, lags in its output and therefore cannot provide its proportion in 10 minutes.
- PSU therefore offers 55 MW of 10S OR and 5 MW of 30R OR.
- The PU allocation, by capability and ramp rate, is:
 - 10S: GT 50, STG 5.
 - 30R: GT 0, STG 5.
- The PU allocation by formula may not align.
- If the PSU --> PU translation of OR allocates by proportion, the 10S 55 MW of OR will be assigned such that:
 - the GT is under-assigned and STG over-assigned 10S OR.
 - STG then incurs an OR Accessibility Clawback in 10S, and
 - GT under-earns OR revenue by having a 30R assignment when 10S is available.

A straightforward solution within the settlement calculations is not clear. An opportunity to amend the PU allocation of OR within the EMI system may be a better solution.

Thanks,

Heather