



December 2, 2020

IESO Stakeholder Engagement
Pre-Dispatch Calculation Engine

Submitted via email

Re: AMPCO Submission - Pre-Dispatch Calculation Engine

AMPCO is the voice of industrial power users in Ontario. Our mission is industrial electricity rates that are competitive and fair.

Attached are AMPCO's comments on the subject of Pre-Dispatch Calculation Engine that are due on December 2, 2020. AMPCO appreciates the opportunity to provide such feedback.

Best Regards,

[Original signed by]

Colin Anderson
President

Pre-Dispatch Calculation Engine

Submissions of the Association of Major Power Consumers in Ontario (AMPCO)

INTRODUCTION

AMPCO provides Ontario industries with effective advocacy on critical electricity policies, timely market analysis and expertise on regulatory matters that affect their bottom line. We are the forum of choice for major power consumers who recognize that their business success depends on an affordable and reliable electricity system.

These submissions are in relation to the detailed design documents posted on the subject of Pre-Dispatch Calculation Engine. AMPCO's members are major power consumers, responsible for over 15 TWh of annual load in the province. A robust and affordable energy supply is critical to the success of their businesses, which is why AMPCO has an interest in this consultation.

AMPCO appreciates the opportunity to provide feedback.

GENERAL COMMENTS

As with the Real Time (RT) and Day Ahead Market (DAM) Calculation Engine design, this document was fairly well organized and provided both descriptive text and the associated variables and equations together, to assist stakeholder review. This will pay dividends when it comes time for the IESO to bring these equations forward to the Technical Panel for inclusion in the Chapter 7 appendices. However, the equations remain difficult for stakeholders to fully digest, and as we have suggested in the past, the IESO should consider bringing in independent consultants at some point to advise stakeholders and ensure fidelity between design, market rules and implementation.

SPECIFIC COMMENTS

- As with the DAM design, this document provides the math for the constraint penalty violation curves. As we asked in two last rounds of Detailed Design documents, we would like the IESO to walk stakeholders through examples of these curves, particularly the various Operating Reserve (OR) violation curves. This has an important impact on price and we would like to fully understand this prior to the finalization of the Detailed Design phase. It seems odd that subsequent documents have included no improvements on this matter, yet several diagrams are included in this document including one on the use of thermal states for Non-Quick-Start units.
- The description of the use of demand forecasting is confusing and needs to be clarified. Section 3.7.1.3 seems to lump the forecasting of Non-Dispatchable Load (NDL) and Price Responsive Load (PRL) together, but section 3.11 clearly states that PRL forecasts and NDL forecasts are separate from one another. In addition, section 3.11 indicates that forecasted NDL load will be supplemented by forecasts for DL without a bid and PRL - without any indication in the document how these values will be calculated. The RT Calc Engine Detailed Design proposed that telemetry would be used for this, we can't understand how this could be viable in Pre Dispatch. This aspect of the design needs to be clarified.