

Feedback Form

Improving Accessibility of Operating Reserve webinar – May 28, 2021

Feedback Provided by:

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Following the May 28, 2021 Improving Accessibility of Operating Reserve (OR) engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by June 18, 2021. If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Proposed Dispatch Tool Change

Topic	Feedback
Do stakeholders foresee any challenges with the proposed dispatch tool change in terms of market participant implementability?	Based on the high-level information provided in the webinar, OPG does not foresee any issues with the proposed IESO dispatch tool change assuming there are no changes to market participant tools and strategy.
From a stakeholder perspective, will the proposed design enable resources' to effectively respond to ORA dispatches?	<p>OPG is confident we can effectively respond to ORA dispatches in the new framework.</p> <p>OPG would like to confirm that the IESO's definition of a resource's "high operating limit" on slide 13 of the webinar presentation is reflective of the maximum energy offer quantity.</p>
General comments/feedback	<p>OPG would like to highlight the importance of allowing ample time for slow-ramping resources to reach their ORA dispatch. If an ORA is received around the same time as an energy dispatch, due to designated ramp rates the resource may not be able to achieve the ORA dispatch within 10 minutes.</p> <p>Below is an example of when this may be an issue.</p> <p>Resource ramp rate – 10 MW/min 13:00 – Resource is at 100 MW and is dispatched to 150 MW for 13:05. 13:01 – Resource receives 10 min ORA dispatch of 100 MW based on the energy dispatch of 150 MW for the end of the interval.</p> <p>OPG understands the ORA dispatch to be 250 MW of energy to be provided by 13:11. If a resource is loading at its ramp rate, it can only ramp up to 210 MW by the end of the ORA interval (13:11).</p> <p>If OPG's understanding of this scenario is correct, the resource would not be able to meet the ORA under the proposed design change according to the submitted dispatch data. One strategy would be for OPG to reduce OR offers to be able to reliably meet ORA dispatches in order to be compliant with Market Rules. However, this would effectively reduce OR availability.</p> <p>OPG is willing to meet with the IESO to discuss potential solutions.</p>

Draft Market Rule Amendments for Dispatch Tool Change

Draft Market Rule / Section	Feedback
Chapter 7, Sec. 7.4.3	No comments
Chapter 7, Sec. 7.4.3A	No comments

Draft Market Rule / Section	Feedback
Chapter 7, Sec. 7.5.9	No comments
General comments/feedback	No comments

Draft Market Rule Amendments for Unwarranted CMSC Claw-back

Draft Market Rule / Section	Feedback
Chapter 7, Sec. 7.4.6	No comments
General comments/feedback	OPG agrees that the proposed unwarranted CMSC claw-back is reasonable.

Draft Market Rule Amendments for OR Settlement Claw-back – Refer to Appendix C of the presentation

Draft Market Rule / Section	Feedback
Chapter 7, Various sections	No comments
Chapter 9, Various sections	No comments
General comments/feedback	OPG agrees that the proposed OR settlements claw-back is reasonable.

General Comments / Feedback

OPG would like the technical specification for a more thorough analysis of the implementability of the proposed change to the IESO's dispatch tool.