

# Feedback Form

## Updates to IESO Monitoring Requirements: Phasor Data – November 19, 2020

### Feedback Provided by:

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Date: December 10, 2020

Following the November 19, 2020 webinar to discuss the synchrophasor technology, the IESO is seeking feedback from participants on the revised implementation plan and proposed Market Rules and Draft Market Manual. The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation can be found under the November 19, 2020 entry on the [Updates to IESO Monitoring Requirements: Phasor Data webpage](#).

**Please provide feedback by December 10, 2020 to [engagement@ieso.ca](mailto:engagement@ieso.ca).** Please use subject: *Feedback: Phasor Data*. To promote transparency, this feedback will be posted on the [Updates to IESO Monitoring Requirements: Phasor Data webpage](#) unless otherwise requested by the sender.

Thank you for your time.

## Revised Implementation Plan

Topic	Feedback
Please specify any concerns with the revised implementation dates and steps.	The implementation dates are reasonable if there is compensation to existing generation facility owners to install the required equipment.

## Proposed Market Rules and Draft Market Manual

Topic	Feedback
Please specify any concerns with the Market Rule amendments.	<p>We are concerned that the proposed Market Rule amendments will create material costs for existing generation facility owners to install the required equipment.</p> <p>TransAlta recommends that the IESO:</p> <ol style="list-style-type: none"><li>1. Revise the market rule to only require new generation facilities to install PMUs, PDCs, and associated equipment. (i.e., grandfather existing generators)</li><li>2. Develop a PMU placement plan similar to PJM's placement plan.</li><li>3. Determine cost responsibility of PMU costs borne by unregulated entities prior to seeking approval of the market rule amendments.</li></ol> <p>Further background on PJM's PMU Placement Plan is summarized in the general comments section.</p>
Topic	Feedback
Please specify any concerns with the proposed specifications listed on phasor data requirements in the draft Market Manual.	

## General Comments/Feedback

PJM does not require existing generation facility owners to install PMUs. PJM only requires new generation facilities larger than 100 MVA to install PMUs [ref: [PJM OATT](#), Attachment O, Appendix 2, s. 8.5.3., PDF 3216]

PJM adopted a [PMU Placement Plan](#) that identifies priority PMU locations based on:

1. Areas of known stability concern;
2. IROL measurement;
3. Expanded observability; and
4. System, generator or load model validation.

PJM priority generators were existing generation facilities larger than 1,000 MW rather than all generation facilities larger than 100 MVA [ref: Synchrophasor Data Quality Group, [PMU Placement Strategy Presentation of June 19, 2018](#), slide 8]. This approach balances the costs of installing PMUs at existing generators with the value of data from each incremental PMU.

PJM notes that the cost to install a PMU is about \$130k USD when including the costs to make a substation “PMU ready”. [ref: Planning Committee, [Phasor Measurement Unit \(PMU\) Placement Plan in RTEP Planning Process Presentation of May 12, 2020](#), slide 9]

Optimizing Ontario’s PMU placement plan could save millions of dollars across both regulated and unregulated entities. We look forward to working with the IESO on optimizing PMU placement in Ontario.