

# Feedback Form

---

## OR Accessibility Feedback

### Feedback Provided by:

Name: Karen Miller

Title: Engineering/Applied Science Trainee

Organization: Ontario Power Generation

Email: [REDACTED]

Date: September 3, 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.

## Feedback on Draft Sections

Topic	Feedback
Chapter 9, Section 3.4	<p>OPG would like to highlight that a resource's AQEI and MAX_CAP parameters are calculated in different units and with different levels of precision. Specifically, AQEI, as defined in Chapter 9, section 3.1.9 is presented in MWh, whereas MAX_CAP and other parameters such as AQOR have been defined in "allocated" MW in "metering interval t", which is not defined. As the calculations need to be performed in the same units, OPG requests clarity on the computational aspect of ensuring unit consistency. Secondly, based on settlement data, AQEI is presented to three significant digits whereas other components in this calculation are generally presented to a single digit of precision. OPG submits that the higher level of precision of AQEI will lead to many, insignificant computations of a charge that will be burdensome from a settlement perspective and recommends that the IESO implement measures that prevent this occurrence.</p> <p>OPG notes three instances of language used to define an activation: Chapter 7, Section 7.4.2.1 uses "not dispatched to increase energy generation (or load reduction) pursuant to section 7.4.3 <b>or 7.4.3A</b>". Chapter 9, Section 3.4.2 states "not dispatched to increase energy generation (reduce load) pursuant to section 7.4.3 of Chapter 7". Finally, Chapter 9, Section 3.4.2.1 states "not dispatched to increase energy generation (or reduce load)". OPG requests that the IESO use the language used in section 7.4.2.1 which identifies that the exclusion is pursuant to both sections 7.4.3 <b>or 7.4.3A</b>.</p> <p>OPG notes that section 3.4.2.1 is applicable to "aggregated facilities", further clarified to include loads as per the term "reduce load". The computation of TAOR_CA is strictly based on AQEI for "aggregated generators" only.</p> <p>Section 3.4.2.1, defines R: as "all class of operating reserve". OPG proposes that the IESO change this language to "all <b>classes</b>" to be consistent with section 3.4.2</p> <p>Section 3.4.2.1, OPG notes the reference to "de-rated generation capacity". OPG proposes that the IESO removes the "s"</p> <p>In section 3.4.3.2, the IESO proposes an equation to calculate the "Total inaccessible operating reserve for generators". Please expand this equation to show the calculation for each class of OR in the term ORCF.</p>

Topic	Feedback
Chapter 7, Section 7.4.2.1	<p>The IESO states that "A market participant shall be subject to non-accessibility charges...during any interval in which it is scheduled to provide operating reserve but is not dispatched to increase energy generation (or load reduction)."</p> <p>Does this non-accessibility charge apply to other resources in the same compliance aggregate that are not activated? OPG believes that this charge should not be applied to resources within the same aggregate as these other resources may be used to assist in reaching the ORA target.</p>
Chapter 7, Section 7.4.3A	<p>The IESO has stated on slide 13 of the May 28, 2021 stakeholder engagement presentation that "The ORA dispatch target will be capped at a resource's high operating limit." Section 7.4.3A in its current form creates the possibility that the IESO could dispatch a resource above its maximum capability. OPG believes that the language in this section should be revised to clarify that a resource will not be dispatched in excess. If this is stated in the current market rules, please reference the section where this is stipulated in section 7.4.3A.</p> <p>In reference to this section, will the IESO use operational meters or revenue meters to measure real-time resource output to set ORA targets? If using operational meters, how would the IESO address instances when the ORA target may result in discrepancies in settlements for the interval(s) following the end of the activation?</p>
Chapter 7, Section 7.4.6	<p>The current language in 7.4.6 broadly refers to "inappropriate" CMSCs. In the May 28, 2021 stakeholder engagement presentation the IESO defined two instances for claw-back:</p> <ul style="list-style-type: none"> <li>• <b>Unwarranted OR CMSC</b> arises when a resource's accessible OR is different from the constrained OR schedule.</li> <li>• <b>Unwarranted Energy CMSC</b> arises when the ORA dispatch signal is revised to account for actual output/consumption of a resource at the time of the ORA.</li> </ul> <p>OPG believes that the language should be clarified to define the types of CMSCs that will be clawed back.</p>

## General Comments / Feedback

OPG requests to have transparency of all settlement-ready data, including the parameters and method behind calculating a resource's MAX\_CAP value. OPG recommends that the IESO separate the calculations for offers and real-time derates/constraints for settlement purposes.