

December 21, 2017

Stakeholder Engagement

Re: Enabling System Flexibility

OPG appreciates the opportunity to provide comments on the materials¹ presented at the Enabling System Flexibility webinar on December 8, 2017.

In general, OPG agrees with the proposed changes to Market Rules and Market Manuals but offers the following recommendations for consideration:

With respect to proposed changes to Market Manual 7.1, Section 2.4.2, the IESO proposes to include as a condition requiring system flexibility, 'material differences between forecasted and actual demand'. This section currently includes other conditions such as material differences between forecasted and actual variable generation output table. For greater transparency, OPG recommends the IESO consider publishing a minimum MW quantity that constitutes 'material differences'. This would be consistent with the IESO's approach in publishing the definition of *Ramp Hours*² to be any hour in which the peak demand forecast exceeds the average demand forecast by at least 300 MW.

During the webinar, the IESO stated that while the Adequacy Report will incorporate a new row to indicate flexibility need (which will be published at the prescribed reporting frequency), the process to determine the required flexibility will only be run once or twice as required due to changes in forecast. To advise market participants of any published changes, OPG recommends that an advisory notice be issued each time this process is run.

Regards,

Herman Mo

for
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¹ <http://www.ieso.ca/-/media/files/ieso/document-library/engage/esf/esf-20171208-presentation.pdf?la=en>

² Market Manual 7.2, section 4.4