## Stakeholder Feedback Form

Date Submitted: YYYY/MM/DD	Feedback provided by:
Feedback Due: July 24, 2020	Company Name:Emera Energy
	Contact Name:Drew Turner
	Phone:
	Email:

The IESO is posting a series of detailed design documents which together comprise the detailed design of the MRP energy stream.

This design document is posted to the following engagement webpage: <u>http://ieso.ca/en/Market-Renewal/Energy-Stream-Designs/Detailed-Design</u>.

Stakeholder feedback for this design document is due on July 24, 2020 to engagement@ieso.ca.

Please let us know if you have any questions.

IESO Engagement



General feedback on the Detailed Design Document (please expand this section if required)

Design Document: Section	Detailed Comments (Areas of Support or Concern)
1. Introduction	
2. Summary of Current and Future State	
3. Functional Design	<ul> <li>Given that the duration of hot/warm and especially cold starts can vary significantly how will the IESO determine the reference parameters for each? Would a formulaic approach determined by hours offline be more accurate rather than limiting to three start states?</li> <li>The detailed design document mentions in several places that the "Hot, Warm or Cold" status needs to be identified in the DAM submission. Start state can</li> </ul>



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	<ul> <li>change throughout the day, an hours offline counter to automatically determine start state or an hourly start state selection would be required.</li> <li>The current pseudo-unit model has some limitations which could potentially be addressed via MRP: <ul> <li>The change in efficiency as derived by the number of GTs online. For example, a 3x1 operation can produce more output than three pseudo 1x1s. Currently there is no way to reflect this in the registration data. If a 3x1 facility registers the PSUs based on a 3x1 maximum, then if only one PSU operates, the plant physically cannot reach the output expected. If the facility registers the PSUs based on a 1x1 maximum the efficient gained by operating in a 2x1 or 3x1 configuration is not accounted for.</li> <li>The detail design document identifies a "Steam Turbine 10-min Operating Reserve Contribution" which provides an allocation of OR to the ST; however, under certain operations OR may not be available or may not be available outside of certain bounds, how is this reflected to the IESO?</li> <li>The MLP on the CTs may be different depending on the number of CTs online. There is currently no way to express this in the PSU model.</li> </ul> </li> <li>Does the IESO intend to allow for hourly selection of simple cycle, intra day? In addition to losing the ST due to a forced outage and/or maintenance during circumstances where there aren't enough hours in the day to satisfy a generators combined cycle start up and MGBRT the generator may elect to offer simple cycle to respond to market conditions, thus providing the system with additional flexibility.</li> </ul>



Design Document: Section	Detailed Comments (Areas of Support or Concern)
4. Market Rule Requirements	
5. Procedural Requirements	
6. Business Process and Information Flow Overview	

