

# Memorandum

To: Technical Panel  
From: Josh Duru  
Date: April 10, 2018  
Re: MR-00435: Station Service Obligations

Attached for Technical Panel review and consideration are the following documents:

- Written Submission from Alectra Utilities (Alectra);
- Written Submission from Rodan Energy Solutions (Rodan);
- Market rule amendment proposal MR-00435-R00.

The IESO proposes to remove the obligation for registered market participants to identify and provide station service estimates and place the obligation on the market participant responsible for registering the relevant facility, consistent with the intent of placing this obligation on the owner of a facility. This change will ensure that the market participant responsible for registering the relevant facility is obligated to comply with the station service provisions in section 2.1A of Chapter 9.

At its meeting on March 6, 2018, the Technical Panel agreed to post MR-00435-R00 for stakeholder review and comment for a period of two weeks, ending March 22, 2018. The IESO received two written submissions during the posting period, one of which supported the proposed amendments. A summary of the written submissions and IESO responses are provided below.

There have been no changes to the amendment proposal since the previous version reviewed at the March 6<sup>th</sup> Panel meeting.

## **Alectra Comment #1**

Alectra believes that “consuming” should be deleted from section 2.1A.1 of Chapter 9 because it creates confusion if the market participant responsible for registering the facility (the owner of the facility), does not consume station service.

## ***IESO Response***

The IESO is of the view that deleting “consuming” from section 2.1A.1 is unnecessary, since the definitions of “connection station service” and “station service” within Chapter 11 of the market rules, specify that “station service” means energy withdrawn to power operations at the facility level (i.e. transmission facilities, generation facilities and connection facilities).

Section 2.1A.1 is appropriately referencing the consumption of station service at the facility. Station service is not consumed by any person, including the owner or market participant responsible for registering the facility, as interpreted by Alectra.

The IESO has since clarified the above with Alectra to their satisfaction.

**Alectra Comment #2**

Alectra believes that supporting documentation for the estimated station service consumption that is submitted by the facility owner to the IESO should be contained in the estimate or available for review by metered market participants within Online IESO.

***IESO Response***

The IESO does not propose to add any additional obligations to submit supporting documentation for connection station service estimates. Currently, there is no obligation to submit the supporting calculations unless requested at the time of audit.

The existing process for the submission of connection station service estimates requires the submission of the station service factor in kilowatts and the stamp and signature of the Professional Engineer who declares that the estimate was calculated in conformance with Part 3.7 of Market Manual 3. The metered market participant will continue to have access to all metering database and metering registry information used to determine that metered market participant's settlement statement. The metered market participant may also request an audit of the connection station service estimate.

**Rodan Comment**

Rodan supports the IESO's proposed market rule amendment. Rodan noted that the market participant responsible for registering the facility, which is typically the owner-operator of the facility, has access to the required information and equipment which aid in the calculation of station service estimates.

***IESO Response***

The IESO thanks Rodan for their support of the amendment.

**Panel Decision Required**

The IESO recommends that the Technical Panel vote to recommend MR-00435-R00 to the IESO Board for consideration at its meeting on June 13, 2018. The recommended effective date is expected to be in September of 2018 upon the implementation of required market manual changes. The IESO will specify the effective date in a notice to all market participants.

Yours truly,

Josh Duru

Attach.