

October 24, 2014

Independent Electricity System Operator
Stakeholder Engagement

Re: SE-109 Outage Management Process Redesign – Comments on Redesign Proposal

OPG would like to offer the following comments and feedback on the October 15, 2014 presentation material and Outage Management Redesign Requirements Summary as requested in the October 16, 2014 stakeholder email

1. Software Design Updates

- OPG has no concerns with the new constraint code “ABNO” provided it remains a non-mandatory reporting requirement as stated in the material.
- The IESO has indicated in the material that there will be an “optional question” asked with respect to various equipment classes such as “Tone Communication Channels”. The requirements document also indicates that “questions” will also be asked for other equipment classes and constraint codes such as “loss of redundancy”. How will these “questions” be presented to API users?

2. Security and Adequacy Reporting Proposals to Support Outage Planning Under the Redesigned Process

OPG is in full agreement with the initiative to provide participants with more and transparent information to support the outage planning and approval process. OPG requests that the IESO, when reviewing reporting requirements for the Daily, Weekly and Quarterly processes, give consideration to breaking down MWs on outage by fuel type, transmission bottling, and zone similar to the 18-Month Report format.

On slide 16 the last bullet states:

- ***Reserve Requirements = Forecast Operating Reserve Requirements (OR) + Load Forecast Uncertainty (LFU) + 18M Additional Contingency Allowance (ACA)***

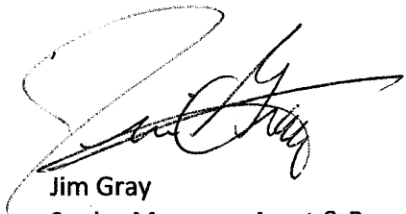
Can the IESO please explain how the 18 month contingency allowance differs from the Additional Contingency Allowance carried in the current SSR and SAA.

In the Daily and Weekly reporting proposals please confirm that the hydroelectric capacity and energy is still provided by participants through the current weekly submission of IMO-FORM-1385 Energy Limited Data.

3. Outage Management Redesign Requirements Summary

OPG is concerned with the automatic rejection process and the transfer of the obligation of follow up to the participant. OPG believes that an outage rejection should not come as a surprise to participant and expects that the IESO will have discussions with the participant during the study period if an outage is at risk. OPG also would expect that outage rejections due to "No time to study" would be infrequent, as one of the main drivers of the outage management process redesign was the elimination of short notice requests and an increase in the IESO study period.

Regards

A handwritten signature in black ink, appearing to read "Jim Gray", with a large, sweeping flourish extending to the right.

Jim Gray
Senior Manager, Asset & Resource Optimization
Ontario Power Generation