

July 5, 2013

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 specific to the revised redesign proposal presented at the June 20, 2013 stakeholder meeting.

**Mid-Term Quarterly Process**

As a result of the changes made since the May 24<sup>th</sup> stakeholder meeting OPG accepts that the advanced approval granted as a result of the mid-term assessment does provide the desired certainty.

During discussion on June 20<sup>th</sup> the IESO indicated that outages whose mid-term advanced approval is revoked in the mid-term timeframe would also be eligible for compensation. Although not specifically stated OPG assumes that, based on current practice, outage costs would have to be provided prior the applicable assessment period.

OPG maintains that the provision of this information provides no benefit to the IESO as cost information is not considered in the assessment/approval process and actual compensation is determined after the fact through the submission of auditable documentation.

OPG requests that the IESO confirm that outages with a mid-term advanced approval, if revoked in the mid-term time frame, will be eligible for outage cost compensation.

**Near-Term Weekly Process**

With the timeline documented in the revised redesign the Near-term Weekly process will provide advance approval, rejection or revocation (mid-term outages only) of outages included in this process a minimum of 5 business days prior to the outage. Although this is less than the 10 business days associated with the current 14 day approval process, the fact that mid-term advance approval carries the highest precedence and in conjunction with the expected ongoing discussions between the IESO and market participants with respect to outages “at risk”, participants should have time to mitigate the impact of revocation.

The documentation indicates that Non-Critical outages that have elected to participate in the Near-Term Weekly process, once the submission deadline has passed, cannot be rescheduled to the Near-Term Daily process until the next coverage period. Is this condition applicable to outages that have been rejected or revoked by the IESO as well?

In the Near-Term Weekly process the IESO indicates that revoked outages will only be eligible for compensation if costs are identified by the submission deadline i.e. EOB on the 3<sup>rd</sup> Friday prior to the coverage period. As stated above OPG maintains that the provision of this information should not be a criterion for compensation eligibility.

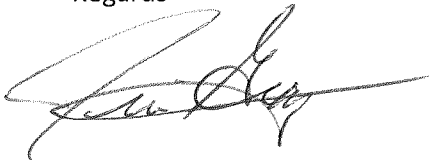
## Near-Term Daily Process

OPG's comments above with respect to the submission of outage compensation costs are applicable to this process as well.

OPG requests clarification on two items in the posted documentation:

- Page 6 – **IESO Assessment** bullet 2  
“Provide *Advance Approval* (outages receive higher time stamp precedence than those within the near-term daily process)”  
It appears that this statement is a carryover from the “Near-Term Weekly Process” and not applicable for this process. For outages being assessed for *Advance Approval* in the Near-Term Daily process timestamp precedence is only applicable to those outages.
- Page 6 – **Outage Priority Sequence** bullet 2  
“Submission time-stamp is to used manage conflict resolution between priority types”  
It is OPG's understanding that time-stamp precedence would only be applicable **within** the priority types. For example if an outage being assessed in the Near-Term Weekly process has an earlier time-stamp than an outage with a mid-term advance approval and these outages are in conflict the mid-term approval still takes precedence regardless of time stamp. Please confirm this understanding.

Regards



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