

September 13, 2013

Independent Electricity System Operator
Stakeholder Engagement

Re: SE-109 Outage Management Process Redesign – Interim Process Feedback

OPG would like to offer the following comments and feedback on the topics identified in the September 6, 2013 stakeholder email.

1. Please provide feedback on the changes to the proposed Interim Process that were presented and discussed at the September 4 meeting.

The proposed changes to the pre-approved outage concept now require that outages meeting the criteria secure both advance approval and final approval to proceed. In OPG's opinion, with these changes, the Interim proposal if implemented will result in less scheduling flexibility than exists with the current outage management process. The Interim process will also likely require OPG to implement additional administrative processes placing additional burden on resources and possibly costs to modify existing software for no overall benefit.

OPG's position is that the IESO should forego the proposed Interim process, i.e. continue using the current process, and focus on the final process and one-time implementation. This will allow the benefits of the new mid-term and near-term weekly processes to somewhat mitigate the reduced flexibility associated with the near-term daily process.

OPG agrees that advancing submission and approval times to 16:00 EST better reflects normal business hours, but for pre-approved outages the 16:00 EST approval time is too late for market participants to mitigate the impact of outage rejection. By this time of the business day all staff involved in planning, scheduling and executing outages are unavailable. Work authorities will not be notified of outage rejection until the outage day which provides no opportunity to redeploy staff or mitigate costs. OPG re-iterates its previously submitted comments that consideration should be given to moving the advance approval time to 14:00 EST.

OPG also suggests that the new defined term "pre-approval" is not appropriate. Based on the proposed changes the criteria only define outages that the IESO will accept for assessment on short notice.

2. Please provide feedback on the proposed Pre-Approval criteria that was presented and discussed at the September 4 meeting.

OPG is concerned that specific criteria are being included to address specific fuel types or operational constraints. It is conceivable that facilities, such as generation part of a hydroelectric cascade, that generally can shift energy from one hour to another can encounter conditions that restrict this flexibility. These criteria, as written, would preclude these facilities from the short notice process. The duration of the de-rating would also have to be limited to a defined forecast.

OPG again stresses the importance of having flexibility when commissioning units. Commissioning activities are dynamic by nature and may not meet defined short notice criteria. Significant delays and costs may result from being constrained to 5 business day submission timeline.

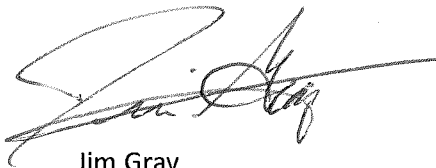
3. Please provide feedback on how market participants would prefer to be notified of facilities that are excluded from the Pre-Approval process due to a system restriction that may not be readily apparent.

OPG would prefer that the IESO provide both verbal and electronic notification.

4. Please provide feedback on how market participants would prefer to manually confirm an outage for Pre-Approval upon submission of that outage (i.e. phone, electronically via the outage slip etc.).

OPG would prefer to provide confirmation via the outage slip either through re-use of the existing confirmation flag (preferred) or through text comments.

Regards



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