

IESO Stakeholder Engagement

From: Robert Cary
Sent: September 20, 2013 1:48 PM
To: IESO Stakeholder Engagement
Subject: SE 109 & MR 404

Can you please clarify what is the difference in purpose between the proposed seminar on 27th Sept and the meeting on 9th Oct.

When is the next TP meeting?

Can you please pass on one emerging concern as follows:

The IESO has indicated any outages requiring to be taken and that otherwise could have been requested as short notice outage requests (the example of a developing tube leak comes to mind) must under proposed rule amendments be taken as forced outages. The problem is compounded by the extension of final application deadline from 3 BD to 5 BD.

We have previously raised the generic issue that this appears to give the IESO reduced ability to influence in any way any outage whose timing may have some, but limited, flexibility.

The problem is further magnified if outage extension requests cannot be handled as short notice requests (please clarify if this is the case), so that all restart delays only evident within 5 BD of planned restart would be classified as forced.

We have just identified an additional concern for NUG facilities. We do not believe that this has previously been addressed under SE-109 or TP discussions. Typical PPA language penalises Suppliers if their capacity factor in on-peak hours that are not approved outages falls below a certain level. This proposed rule amendment effectively reclassifies certain outages from “approved” to “forced” and could therefore jeopardise achievement of required threshold levels. This has material commercial risk impacts.

We would appreciate an opportunity to discuss this as soon as possible.

Rob Cary