

Outage Management Redesign (SE-109)

Feedback & Response on Materials Presented at the
October 9, 2013 SE-109 Meeting



On October 9, 2013 stakeholders were asked to provide feedback on the following items associated with the Interim Outage Management Process redesign:

- Proposed Criteria for Pre-Approval
- Proposed implementation plan for the Interim Process

Feedback was received from the following stakeholders:

- Gerdau
- Goreway Station Partnership
- Hydro One
- **Brookfield Renewable Energy Group**
- Ontario Power Generation
- Pattern Energy
- Portlands Energy Centre

The following pages provide stakeholder feedback in either verbatim or paraphrased form. Paraphrasing was required due to the confidential nature of some of the comments received. The feedback is grouped by the questions that stakeholders were asked to provide feedback on and IESO responses and actions that will be taken are provided in italics beneath each piece of feedback.

- 1. To facilitate member's ability to provide detailed feedback on the revised criteria for pre-approval, a word document version of the proposed changes to Market Manual 7.3, Appendix B: Outage Reporting Requirements is attached. The IESO requests that comments and suggestions are inserted directly into the document and a red-lined version is sent back. The existing outage reporting requirements are available [here](#) for comparison.**

Ontario Power Generation (OPG)

OPG submitted comments directly on the proposed changes to Market Manual 7.3 document. The verbatim feedback has been posted to the [SE-109 webpage](#) under the row dated October 18, 2013.

The IESO Response had been added to the OPG submission and posted on the [SE-109 webpage](#) under the row dated October 25, 2013. OPG comments are identified by the initials 'JNG' and IESO comments are identified by the initials 'MG'.

Hydro One

Hydro One submitted comments directly on the proposed changes to Market Manual 7.3 document. The verbatim feedback has been posted to the [SE-109 webpage](#) under the row dated October 18, 2013.

The IESO Response has been added to the Hydro One submission and posted on the [SE-109 webpage](#) under the row dated October 25, 2013. Hydro One comments are identified by the initials 'REW' and IESO comments are identified by the initials 'MG'.

Gerdau

Gerdau requested that the feedback submitted not be posted publicly due to the confidential nature of the information provided. However, Gerdau agreed to discuss the feedback with SE-109 members during the next meeting.

The IESO will consider the comments and individually discuss a response with Gerdau prior to presenting the information at the next SE-109 meeting.

Pattern Energy

Pattern Energy identified an issue with the proposed pre-approval criteria for generating facilities unable to store their fuel, specifically wind generators. The currently proposed criteria would allow a generating facility to submit a de-rating for pre-approval as long as the de-rating was above the two business day-ahead production forecast. This approach would ensure the IESO would only be approving a capacity reduction if it was above the energy forecast. The criteria failed to address the fact that any de-rating submitted above the forecast would effectively reduce that same forecast to a level below the pre-approval threshold as fewer wind turbines would be available for energy production.

The IESO will consider alternative criteria and discuss at the next SE109 meeting on November 13, 2013.

- 2. Feedback is encouraged on the training methodology and timing of activities within the proposed interim process implementation schedule as per slide 9 of [the presentation](#) used in the October 9 meeting.**

Goreway Station Partnership

Goreway had questions regarding the training proposal. The primary concern raised was related to getting adequate training for the plant staff once the changes are finalized.

Portlands Energy Centre

Verbatim feedback: It would be useful if the training methodology involved not only reviewing the rules but also actual demonstration of inputting outages.

For the user sandbox testing of the new software release we suggest that a check-list of functionality to test/check is provided by the IESO.

Regarding the February 5th "Go Live Date", we suggest that the specifics of what "Go Live Date" means are clearly delineated to market participants and that the treatment of outages that have already been submitted to the IESO before that date are provided. For clarity we suggest that there be a specific date on which the "Go Live Date" is confirmed e.g. the IESO will confirm the "Go Live Date" by Jan. XX.

The IESO training document entitled: "On-line Outage Request Form A Step-by-Step Guide" that was issued July 2012, should be revised to reflect the interim process.

Brookfield Renewable Energy Group

Verbatim feedback: As discussed today Brookfield supports IESO proposed improvements to the Outage Management process as has been proposed. However since we will need to redesign some of our internal processes and train regional field staff to ensure our annual outage planning aligns with changes we would like the implementation of proposed changes delayed until at least Q2- 2014.

We feel the outage management change process rule changes are neutral in an overall cost benefit and therefore a delay of implementation date would only be helpful to allow all market participants time to implement the changes/training once approved.

Although we have followed the SE-109 proceedings and agree with intent to implement changes we do not feel a need to implement January 1, 2014, nor believe a delay would be detrimental to overall marketplace.

To clarify, the IESO proposed implementation date for the Interim Process is February 5, 2014. The rationale for the implementation date is to have the Interim Process in place before the high outage volume associated with spring maintenance activities begins. IESO feels the changes required for the Interim Process are minor enough and the implementation process will be supportive enough to ensure market participants are prepared by February 5. The IESO has not received specific concerns from other stakeholders that the February 5 implementation date is problematic.

With respect to ensuring that market participants are prepared, the IESO will consider the feedback received from stakeholders and discuss a proposal at the next SE-109 meeting on November 13, 2013 which will include but not be limited to the following:

The IESO intends to provide 3 more sessions within the SE-109 engagement (November 13, early December and mid-January) that will discuss software changes (minimal) and market manual changes that are required to support the Interim Process proposal. Sandbox testing of the software changes will be provided 2-3 weeks prior to the anticipated in-service date of February 5, 2013. Also, IESO staff would be available to discuss any questions with participants on an individual basis as required.

The training is intended for the people participating in the SE 109 engagement with the expectation that they will communicate the changes to frontline staff as it pertains to their business functions. The IESO will open this topic up for further discussion at the next SE 109 meeting (November 13) to identify potential opportunities for the IESO to assist participants with that communication. Stakeholders are encouraged to bring forward any special requests.