

Outage Management Redesign (SE-109)

Feedback & Response on Materials Presented at the November 13, 2013 SE-109 Meeting



On November 13, 2013 stakeholders were asked to provide feedback on the following items associated with the Interim Outage Management Process redesign:

- Final Proposal on the Criteria for Pre-Approval
- Proposed changes to Market Manual 7.3: Outage Management
- Final Proposal for training on the interim process and software changes

Feedback was received from the following stakeholders:

- Gerdau
- Ontario Power Generation
- 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 items listed above. IESO responses and actions that will be taken are provided in italics beneath each piece of feedback.

1. Final Proposal on the Criteria for Pre-Approval

No comments received.

2. Proposed changes to Market Manual 7.3: Outage Management

Please note that any further comments on changes to Market Manual 7.3 will be accepted through the Baseline 31.0 comment period (early December to early January). Once posted, the document will be made available through the 'Change Notifications Listing' link on the Pending Changes [webpage](#).

Ontario Power Generation

With respect to Section 1.3.5.1, paragraph 3, OPG would like to understand the IESO's need for information slips on generating units that are available but not operating based on market signals. If a unit is not on an outage is it not assumed to be available regardless of whether there are offers at market?

The IESO agrees that the unit is mechanically available in this scenario. The rationale for including the example was to demonstrate that the information would be valuable to the IESO because the unit would realistically be delayed in its ability to provide energy. However, in recognition that the wording in Section 1.3.5.1 implies the

information must be reported via an outage request, it will be removed and other methods of determining a unit's delay in providing energy will be relied upon (i.e. an absence of market offers).

With respect to Section 1.3.5.10, paragraph 2, OPG proposes the following wording: Forced extensions must be electronically updated by the market participant and communicated via telephone to IESO Shift Operations and if identified by 15:00 EST, one business day prior to the planned end time of the outage via telephone to IESO Market Forecasts & Integration on a best effort basis.

The IESO agrees with the requirement to report to the IESO outage office on a best effort basis only. The wording in Section 1.3.5.10, paragraph 2 will be changed to: "Forced extensions must be electronically updated by the market participant and communicated via telephone to IESO Shift Operations. If the forced extension is identified by 15:00 EST, one business day prior to the planned end time of the outage the market participant shall on a best effort basis also communicate the forced extension to IESO Market Forecasts & Integration."

With respect to Section 1.3.13 regarding new facility energizations, can the IESO provide additional context as to why these types of activities could not be accommodated as pre-approved.

The timelines for pre-approval do not allow sufficient time for the IESO to adequately assess the impact of energizing a new facility and typically require significant coordination between different business units in the IESO, the market participant who owns facility is being energized and third party market participants. Additional context will be included in Section 1.3.13 to explain the rationale.

With respect to Sections 1.3.15 and 1.3.15.3 regarding the requirement to provide information on the scope of potential testing or commissioning changes up front in exchange for scheduling flexibility, the IESO needs to provide clarity and examples of the type of information that would meet this condition.

The IESO agrees and the wording will be modified. High-level examples will also be provided for additional context and clarity. Examples of testing and commissioning scope and potential scope changes include, but are not limited to the following:

- *Changes in generator MW or MVar loading or loading ranges*
- *Any ideal conditions (environmental; power system dependent etc.) required for specific events to take place*
- *Changes in the sequence of testing activities*

Section 1.3.15.5 makes reference to Section 1.3.16, which should make reference to Section 1.3.16.

The IESO agrees and will implement the recommended change.

With Respect to Section 1.3.17, paragraphs 2 and 3, although at times Segregated Mode of Operation (SMO) submissions will meet the pre-approval deadline the majority of SMO requests will not be finalized until the pre-dispatch day. The highlighted section implies that the IESO will permit

SMO submissions post dead line but OPG cautions that strict adherence to the pre-approval submission time lines will preclude much of the SMO activity.

The IESO has assessed this risk and anticipates little to no impact on the way SMO requests are handled today.

With respect to the pre-approval criteria for commissioning in Appendix B, OPG remains concerned that commissioning will not be afforded the flexibility required to complete activities in an effective and efficient manner.

The IESO believes the criteria and the supporting language for scheduling flexibility described in Sections 1.3.15 and 1.3.15.3 provides the maximum amount of flexibility that can currently be afforded from a reliability assessment perspective. Through continued stakeholder consultation in SE-109 Outage Management Process Redesign, the IESO will work with market participants to understand concerns regarding planning for commissioning activities under the Interim Process in order to identify and assess opportunities to make changes for the Final Process Redesign.

Portlands Energy Centre

The term “pre-approval (1-day advance approval)” is used in the document in sections 1.3.3 and 1.3.5.1 to clarify what is meant by outage pre-approval. We suggest that the term “pre-approval” be replaced with “1-day advance approval”, or similar terminology, throughout the document in order to better reflect the true nature of this approval.

The IESO agrees that the term pre-approval does not fully capture the concept that is being implemented for the Interim Process, however the term will be retained to maintain consistency with the intended direction for pre-approval in the Final Process Redesign. In order to mitigate confusion, the wording “1-day advance approval” will be included in brackets next to the term pre-approval every time it is used in the Market Manual.

Under Section 1.3.3, replace “with” with “to” in the following sentence:

“In order to receive three-day advance approval for planned outages, market participants must submit an outage request with the IESO no later than 16:00 EST, five business days before the scheduled start date of the planned outage.”

The IESO agrees and will make the recommended change.

Although this comment is not directly related to the Outage Management Process Redesign we believe it should be addressed as there appears to be a discrepancy between the “Market Rules” and the “Market Manual”. Section 1.3.3, Figure 1-2 indicates that the market participant should request final approval to begin an outage 1 hour prior to the outage start. The reference to 1 hour should be dropped. As per Chapter 5 Section 6.4.3.3 of the market rules the market participant is required to seek final approval “immediately prior to the scheduled commencement of the planned outage or at a pre-arranged time specified by the IESO when providing the advance approval.”

The IESO agrees and will change “1 hour” to “just prior” in the Market Manual.

Although this comment is not directly related to the Outage Management Process Redesign we believe it should be addressed as it describes a practice that may no longer be in effect. In Section 1.3.5.1 under the sub-heading “Date and Time” there is reference to the IESO system automatically adding 2 minutes to outage start and end times so that the outages can be modelled accurately. Our understanding is that this is no longer being done. If this is the case then the wording should be revised.

This reference was inadvertently left in the document and will be removed.

With respect to Section 1.3.15.2 and as discussed at the November 13 meeting, replace “not subject to submission requirements” with “not subject to submission deadlines”.

The IESO agrees that “submission deadlines” along with ‘submission requirements’ is needed to fully capture the requirements associated with requesting pre-approval (1-day advance approval). All reference to ‘submission requirements’ will be changed to ‘submission deadlines and requirements’ in the Market Manual.

In Table 2.1 Ref. 2.0.4 “Two business days before the scheduled start date of the outage, by 14:00 EST.” is not consistent with the interim process and should be corrected.

The IESO agrees and will make the recommended change.

Gerdau Whitby

A number of factors can delay work that is already in progress – weather, problems found with the equipment or external issues that prevent the work from being completed on time. Some of them can be as subtle as work going past a deadline and the internal resources required for switching are no longer available, pushing an outage from Friday afternoon until Monday morning when the resources are once again ready to work.

If a delay occurs to an outage in progress, it can easily affect another outage tied to the completion of the first outage. Thus, Outage “A” could prevent Outage “B” from starting on time. Presently, when these difficulties arise, we used the short-notice process by phoning the IESO, explaining our situation, making whatever adjustments are required by the IESO Operators to the outage slips and carry on with our work. We have used this flexibility to our advantage to perform the work within our constraints and return the equipment to service.

However, from the recent SE-109 discussions, it has occurred to me that the operators may be accommodating short notice requests in the spirit of cooperation and that the proposed framework may not allow for the present response to our situation to continue. I believe that our position on the grid may make it easy to determine that we pose no issue with the rearrangement of our outages, but it is not clear on how to route our requests through the proposed Outage Management system.

The Pre-Approval process will allow us to plan the work effectively and respond to issues ahead of the job but what is the correct way to handle problems that arise during the execution of that work?

For this specific situation, the IESO would expect “Outage A” to be “force extended” by the market participant. Under the existing outage process and the upcoming Interim Process, an outage is “force extended” if returning the equipment back to service within the original end date would pose a risk to the equipment, environment, public safety or any regulatory requirements – a decision that is at the discretion of the market participant and one that the IESO is not in a position to provide direction on. For similar reasons, the market participant would have the option of also forcing an outage on the equipment in “Outage B”. Absent any of the reasons listed above, “Outage A” would be expected to end as scheduled and completion of the work for Outage A and Outage B (if dependent on Outage A) would need to be resubmitted in accordance with the submission deadlines and requirements for pre-approval.

This approach ensures that outage churn and increased risk to system reliability are only introduced for unavoidable circumstances that place the outage request at a higher priority and ahead of other planned work.

However, the above situation, along with similar situations discussed at the November 13 meeting introduce scenarios for in-progress outages that the IESO believes would be prudent to assess, up to and including real-time. As a result, the IESO will include wording and examples in the Market Manual to allow for the assessment of outage requests submitted after the submission deadlines on a best effort basis if the request would expedite the return to service of equipment that is already on outage. Examples of these requests may include, but are not limited to:

- A planned transmission line outage unexpectedly requires a bus terminal out of service in order to return the transmission line to service.*
- A generator planned outage is scheduled to end early but requires an unexpected test to be performed before the generator can be made available for service.*

3. Final Proposal for training on the interim process and software change

No comments received.