

June 11, 2014

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 and feedback on the material presented at the June 4, 2014 stakeholder session.

- 1. Feedback on the proposed Equipment Model, specifically whether the equipment classes being proposed (slide 18) align with the equipment market participants typically report outages against.***

OPG has no concerns with the proposed equipment model and the proposal captures typically used equipment classes.

- 2. Feedback on the proposed method for reporting outages to primary protections, breaker failure protections, automatic voltage regulators and power system stabilizers (slide 19). Participants are encouraged to provide suggestions for reporting on other auxiliary equipment in this manner.***

OPG has no concerns with the proposed alternate method for reporting the equipment classes listed above provided this methodology is **not** mandatory. OPG has not yet confirmed whether existing software can accommodate this change so provided OPG can still use “other miscellaneous equipment” class to convey outages to these equipment types there are no issues.

- 3. Feedback on the proposed constraint and purpose codes associated with the priority codes (i.e. forced, urgent, planned, opportunity and info) of the final process design (slides 20 – 24). Participants are encouraged to provide suggestions for additional constraint or purpose codes that would be meaningful to their outage reporting needs.***

The IESO has identified 5 priority codes in the material presented. OPG assumes for each priority code listed that any constraint code can be used in combination with the priority code. Please confirm this assumption. It is unclear if purpose codes will be restricted to specific constraint codes or can be used in any combination with the constraint codes. Also will a single outage request be able to have multiple sequential constraint codes such as is currently permitted under testing. Please confirm that the “other” purpose code will be applicable to any constraint code.

In order to maintain consistency with “event types” currently recognized by IOMS, OPG requests consideration be given to including “Test” as a priority code. Also consideration

should be given to including "Must Run" as a recognized constraint code. There are contributing factors such as equipment protection or regulatory requirements that can require a generator to remain on line. Although it is the participant's obligation to offer a resource to achieve the desired dispatch inclusion of this constraint code more clearly identifies the requirement to the IESO.

4. Feedback on the proposed mechanism for Auto Advance Approval (slide 25 - 32). Participants are encouraged to provide suggestions for additional constraint or purpose codes that would be meaningful for their outage reporting needs.

OPG has no comments on the proposed Auto Advance Approval rules at this time but sees limited applicability from a generator perspective.

5. Feedback on the proposed methodology for enabling the lead time (i.e. submission deadline) validation for the 3 Day and 1 Day Advance Approval processes within the vendor's existing software framework (slides 33 - 36).

OPG understands the desire to maintain software flexibility and minimize cost but OPG will not support any further reduction in scheduling flexibility due to software limitations. The software solution should provide the same availability to the 1 day AA process as the current manual validation process.

OPG offers the following comments/questions on the scenario provided:

**Lead Time Validation Scenarios (Slide 36)
Greenfield G1 (Non Critical Facility Class)**

- *Ignoring any outage request attributes, a planned outage to Greenfield G1 would have a submission deadline of 16:00 EST, 5 business days in advance*
 - *No new code required: G1 can be classified as non-critical and any planned outage request for G1 would have a submission deadline of 16:00 EST 5 business days in advance*

Elimination of the 1 day AA process for non-critical facilities is not acceptable.

- *However, according to the 1 Day AA criteria, if the Greenfield G1 outage request starts and ends in the same day or has a max recall ≤ 15 min, the planned outage would now have a submission deadline of 16:00 EST 2 business days in advance.*
 - *New code required: G1 is Non-Critical, but software must ignore the 5 business day deadline and determine that a 2 business day deadline applies based on specific outage request attributes.*

In OPG's opinion this is the preferred option as it maintains the current 1 Day AA process.

- *Alternatively, G1 could be modelled as a Low Impact Facility Class and be eligible for 1 Day Advance Approval regardless of outage attribute criteria.*

Does this imply that a facility that is deemed to be low impact can submit any outage for 1 Day AA even if it doesn't meet the current pre-approval criteria e.g. an outage greater

than 1 day? If so, what criteria would be used to determine that a facility is low impact? If generators would be excluded from this facility class this option would not be acceptable as scheduling flexibility would be reduced.

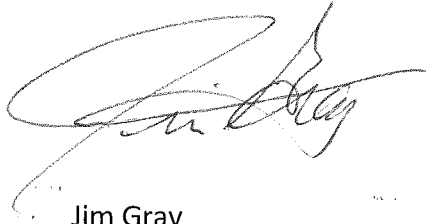
OR

- *G1 could be modelled as a Non Critical Facility Class and be eligible for 1 Day Advance Approval if the "Low Impact OOS" constraint type is used.*

This alternative appears to be acceptable but as the constraint code is selected by the participant will the software still not have to validate the outage attributes to ensure that pre-approval criteria are met?

At this time OPG may not leverage all available constraint codes due to anticipated application changes required. Will the manual pre-approval validation process still be available following final process/tool implementation?

Regards

A handwritten signature in black ink, appearing to read 'Jim Gray', with a large, sweeping flourish extending to the left.

Jim Gray
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Ontario Power Generation