

July 10, 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 July 3, 2014 stakeholder session.

**1. *Feedback on the proposed 1 Day Advance Approval Criteria Validation for the vendor solution (Slides 10 - 12).***

OPG has no comments on the proposed 1 Day Advance Approval Criteria Validation.

**2. *Feedback on the proposed Final Approval in Advance process and feature for the vendor solution (Slides 14 – 15).***

The IESO states the following on Slide 15:

*State Transition Rule:*

*If FAA flag is still present at 00:01 EST on the day the outage starts, the outage will auto transition from Advance Approved to Final Approved.*

If the IESO manually unsets the FAA flag after 00:01 on the day of the outage please confirm that the IESO will verbally inform the participant that final approval has been revoked.

**3. *Feedback on proposed Conflict Checking feature for the vendor solution (Slides 16 – 17).***

OPG suggests that the IESO provide a more comprehensive matrix of “undesirable equipment combinations” for discussion at the next SE 109 stakeholder meeting. Also the IESO should provide to participants a final matrix to prior to implementation to assist in outage planning. This matrix should be re-published anytime the IESO makes changes.

On Slide 16 the IESO states the following:

- *Auto Advance Approval rules were discussed at the June 4 meeting:*
  - *Conflict Checking will prevent overlapping outages to the same equipment from receiving Auto AA*

- *The outage request would still be accepted for manual advance approval (or rejection/at risk) in the next available process*

OPG requests that the IESO provide an example that clearly demonstrates the IESO's interpretation of the above highlighted statement.

- 4. Feedback on the proposed migration strategy for historical, in progress and future outage requests (Slide 18). Please note that the timeframes presented in the slide deck assume an automatic approach to migration of outage requests. The IESO would not preclude any future outage requests from being manual migrated provided that the market participants are involved in the migration effort.***

OPG stresses that any "future outages" that are not captured in an automated migration and have to be re-submitted must have their precedent time stamps manually reset to the pre-migration date/time.

Regards



Jim Gray  
Senior Manager, Asset & Resource Optimization  
Ontario Power Generation