Stakeholder Feedback and IESO Response

Awareness or System Operating Conditions – January 27, 2022

Following the January 27, 2022, Awareness of System Operating Conditions webinar, the IESO invited stakeholders to provide comments and feedback on the materials presented by February 17, 2022. The IESO received written feedback submissions from:

- Ontario Power Generation

The presentation materials and stakeholder feedback submissions have been posted on the IESO stakeholder engagement webpage for this engagement. Please reference the material for specific feedback as the below information provides excerpts and/or a summary only.

Proposed Changes to Market Rules and Market Manual Feedback:

Feedback	IESO Response
- Comments were submitted for Market Rules Chapter 5 Section 2.5.1, and the question of How far in advance can the IESO declare a conservative operating state was asked. - In relation to triggers in the proposed Market Rules Chapter 5 Section 2.5.1 referring to "forecasted" or "expected" conditions OPG feels that in order to reject / revoke / recall outages, the threat of these contingencies should be immediate, and not just reasonably expected in the forecast.	- A conservative operating state will be declared only in real time by the IESO. During the day 1-5 timeframe, the IESO will continue to publish advisory notices such as the severe weather alerts and extreme conditions alerts to notify Market Participants (MPs) about the potential for stressed system conditions. - As per MM 7.4 Section 2.4.1, the IESO may take actions today such as rejecting, recalling, or revoking outages when we anticipate or are experiencing extreme conditions as implementing these actions takes time (outage recall times). To inform

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In relation to the proposed change to (proposed Market Manual 7.1 Section 2.3 and Market Manual 7.4 Section 2.4.1). The ability to reject/ revoke / recall outages is an unreasonable requirement given that the Conservative Operating State is on the same security level as the Normal Operating State - The IT-related triggers listed in the proposed Market Rules Chapter 5 Section 2.5.1 affect real-time market participation but do not put the grid at risk. Can the IESO define situations where there are IT issues that would trigger a conservative operating state.	the marketplace of these potential actions, the IESO publishes advisory notices to provide advance notice to MPs when taking such actions. The IESO is not introducing any changes to today's practice in this regards. Rather, the IESO is enhancing the communications to introduce a new conservative operating in real time to minimize risks on the power system and to posture the grid to be more resilient during or in anticipation of extreme conditions. - The conservative operating state is on the same security level as the normal operating state; however, the adverse impact of contingencies is much higher on reliability during a conservative operating state. Therefore, the IESO may need to take actions including reject/revoke/recall outages to enhance grid resilience. At the same time, the IESO will look to MPs to suspend any non-urgent maintenance or switching activities on facility elements that could impact the operations of the *ICG* (e.g. for which outages must be reported) to minimize risks of contingencies on the power system during a conservative operating state. The declaration of conservative operating state will be one of a control actions available to the IESO in response to a reliability concern and leading up to an emergency operating state. - IT-related triggers for the conservative operating state include unplanned IT related outages that can impair IESO market or system applications or tools such as Energy Management System or Market Interface System. These tools are used by the IESO to monitor and operate the grid, and therefore, without them, the monitoring of system security maybe impacted or limited. Please

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	note that the IESO will continue to issue advisory notices to notify MPs of IT outages that do not impair market or system applications.