

Feedback Form

Interchange Schedule Code, MrNH – May 22, 2024

Feedback Provided by:

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Date: June 5, 2024

To promote transparency, feedback submitted will be posted on the [Interchange Schedule Code, MrNH](#) web page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark as "confidential".

Following the May 22, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback on items discussed. The webinar presentation and recording can be accessed from the [engagement webpage](#).

Please submit feedback to engagement@ieso.ca by June 5, 2024.

Specific Comments/Feedback

Topic	Response
Do you have any comments or feedback on issues with the MrNH code that have not been identified by the IESO?	
Do you have any comments or feedback on the proposed changes to the MrNH code?	
Do you have any comments or feedback on the proposed changes to the MrNH code that have not been considered by the IESO?	

General Comments/Feedback

The IESO suggests that charging the IFC for lack of transmission or ramp is consistent with other jurisdictions. Which jurisdictions? If a real time transaction with MISO is not scheduled due to either of those reasons, the schedule simply does not flow. No failure charges exist. Further, the IESO presentation implies most failures are a 'choice' by the participant; this is not our view.

The IESO is also suggesting that participants should acquire transmission service and ramp 2 hours ahead of dispatch, yet that dispatch is not committed to by the IESO until the final predispach report is published. That means you are expecting participants to purchase costly MISO transmission before the final schedule is known, and that could be anywhere from 0 to the full MW value on offer. It is notable that MISO transmission service cost is often on the order of the actual energy cost itself, making some offers economically unfeasible without knowing dispatch is certain. These code changes may have the unintended consequence of an overall reduction in otherwise viable offers to the IESO.

MISO transmission service availability can be variable, and the only way to check is to actually book it, and find out if it is refused or accepted. Perhaps the IESO could consider increased seam communication with markets like MISO. If MISO could provide a flag on whether next hour transmission was available on the interfaces with IESO, then the IESO would have a validation check on the legitimacy of a transmission failure or not.

While MISO ramp service does not cost, it is very much a moving target. All ramp failures are genuine; MISO evaluates the new tag or adjust at the time they are submitted, and approves or denies based on the conditions at that instant. Perhaps the IESO could evaluate whether a ramp denial is valid based on the timing of the adjust or tag submittal. If submitted within the last 60

minutes (as an example) prior to the deadline, ramp denial could be considered a valid failure reason. Submit too soon and denied for ramp – code it 'OTH'.