

IESO Response to Stakeholder Feedback

Improving Accessibility of Operating Reserve – May 28, 2021

Following the [May 28, 2021 Improving Accessibility of Operating Reserve stakeholder engagement webinar](#), the IESO invited stakeholders to provide comments and feedback on the materials presented by June 18, 2021.

The IESO received written feedback submissions from:

1. H2O Power
2. Capital Power
3. Ontario Power Generation (OPG)

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 Dispatch Tool Change – Do stakeholders foresee any challenges with the proposed dispatch tool change in terms of market participant implementability?

Feedback

Capital Power would appreciate further opportunities to discuss challenges for facilities that may offer energy from duct burners.

IESO Response

The IESO is open to this discussion.

Proposed Dispatch Tool Change – From a stakeholder perspective, will the proposed design enable resources' to effectively respond to ORA dispatches?

Feedback

H2O Power – H2O recommends a design change to the Operation Reserve Submission Form in the Energy Market Interface (EMI) by increasing the laminations from 5 to 20. This will allow the Market Participant's OR Offer/Bid structure to align with their corresponding Energy Offer/Bid structure.

OPG – OPG would like to confirm that the IESO's definition of a resource's "high operating limit" on slide 13 of the webinar presentation is reflective of the maximum energy offer quantity.

IESO Response

Changes to the Energy Market Interface are not within the scope of the Improving Accessibility of Operating Reserve Project.

The IESO confirms that the high operating limit is reflective of the maximum energy offer quantity. It also considers any derates and constraints that were used to determine the most recent energy dispatch sent to the Market Participant.

Proposed Dispatch Tool Change – Miscellaneous

Feedback

OPG – OPG would like to highlight the importance of allowing ample time for slow-ramping resources to reach their OR activation (ORA) dispatch. If an ORA is received around the same time as an energy dispatch, due to designated ramp rates, the resource may not be able to achieve the ORA dispatch within 10 minutes.

IESO Response

The IESO currently considers submitted ramp rates when providing energy dispatches and OR schedules. There is therefore no change with how OR is scheduled and activated when resources are

generating below their energy dispatch (as described in the scenario provided) at the time of an OR activation.

The IESO is open to have further discussions with participants to clarify if required.

Draft Market Rule Amendments for Dispatch Tool Change

No feedback received.

Draft Market Rule Amendments for Unwarranted CMSC Claw-back

Feedback

Chapter 7, Sec. 7.4.6

Capital Power suggests striking the term “inappropriate” from the amendment, since this language is inconsistent with previous use of “unwarranted” to describe the CMSC to be clawed back and appears unnecessary for the application of the amendment.

IESO Response

In light of similar feedback received at the Technical Panel meeting on July 27, 2021 the IESO continues to assess this particular item. The IESO intends to provide a response ahead of the October TP meeting.

Draft Market Rule Amendments for OR Settlement Claw-back – Refer to Appendix C of the presentation

No feedback received.

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