

Feedback Form

Improving Accessibility of Operating Reserve webinar – March 25, 2022

Feedback Provided by:

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Following the March 25, 2022 Improving Accessibility of Operating Reserve (OR) engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the proposed Market Rule amendments. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please provide feedback by April 19, 2022 to engagement@ieso.ca. Please use subject: *Feedback: Operating Reserve*. To promote transparency, this feedback, if provided in an AODA-compliant format (e.g. using this form) will be posted on the [Improving Accessibility of Operating Reserve webpage](#) unless otherwise requested by the sender.

Proposed Market Rule Amendments

Draft Market Rule / Section	Feedback
Chapter 7, Sec. 7.4.3A	
Chapter 7, Sec. 7.4.2.1	
Chapter 7, Sec. 7.4.6	
General comments/feedback	

General Comments / Feedback

Over the course of this engagement, the IESO has considered various changes to how Operating Reserve is scheduled, activated, and compensated. As the engagement reaches its final stages, could the IESO please confirm how compliance with Operating Reserve Activations will be assessed.

Will compliance be assessed in line with the *Compliance with Dispatch Instructions Issued to Dispatchable Facilities* Interpretation Bulletin issued by the Market Assessment and Compliance Division (MACD) of the IESO in 2009?

Section 2.1 of the Interpretation Bulletin states the following:

“Activation of Operating Reserve for Individual Resources Dispatch instructions for energy that are flagged by the IESO as activation of operating reserve are accompanied by an “ORA” flag. Failure to comply with these dispatch instructions occurs when a dispatchable generation facility fails to be at or above the dispatch instruction within the timeframe specified by the operating reserve market for which the dispatchable generation facility was scheduled.”

For example, if a dispatchable generation facility was offline and then received an ORA dispatch for 10-minute operating reserve (i.e., ORA), would the facility have to be at or above the ORA dispatch instruction 10 minutes after receipt? In this example if the ORA dispatch was to 30 MW, it would have to be at or above 30 MW exactly 10 minutes after receiving the ORA?

Further, if a dispatchable generating facility was online and scheduled for 20 MW in the energy market, but was generating at 22 MW, at which point it received an ORA dispatch to 30 MW, would the generating facility be deemed compliant with its ORA obligation if it was generating exactly 30 MW at 10 minutes following the receipt of the ORA instruction?

What is the expectation on Market Participants to assess compliance with an ORA in real time if the IESO uses operational meters and assesses compliance down to the second when ORA dispatches do not provide the exact second that an ORA was sent/received?