

# Feedback Form

## Transmission-Distribution Coordination Working Group (TDWG) – June 29, 2022

### Feedback Provided by:

Name: Click or tap here to enter text.

Title: Click or tap here to enter text.

Organization: Hydro Ottawa

Email: Click or tap here to enter text.

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Following the May 16<sup>th</sup> Transmission-Distribution Coordination Working Group meeting, the IESO is seeking feedback on a number of questions related to transmission-distribution coordination.

**Please provide feedback by July 20th, 2022 to [engagement@ieso.ca](mailto:engagement@ieso.ca).** Please use subject header: *TDWG*. To promote transparency, this feedback will be posted on the [TDWG webpage](#) unless otherwise requested by the sender.

The IESO will work to consider and incorporate comments as appropriate and provide responses at the next TDWG meeting. Thank you for your contribution.

## Specific Questions for Comment/Feedback

Topic	Feedback
<p>Any suggestions for additional topics needed in order to develop the TDWG deliverable (which was described in greater detail today)?</p>	<p>Add the use case of having the LDC or and transmitter playing the aggregator or sole DER representative role to the IESO respectively within their service domain.</p>
<p><i>What existing/new processes could distributors use to communicate distribution "override" conditions to customers with DER facilities and DER aggregators that are participating in the wholesale market?</i></p>	<p>Communicate / coordination between LDCs, transmitters, aggregators / DER facilities and the IESO should be through a common tool or, preferably, 100% certified interoperable tools. The tools should be auditable and availability / participation progressively visible and verify-able from the DER through all stakeholders and eventually the IESO. Anything else will add complexity, cost, and confusion amongst the stakeholders.</p>
<p>The ESIG example of DER De-Rate Notification is expected to inform the IESO's drafting of conceptual T-D coordination protocols for discussion at a future TDWG session. Any considerations you advise we bear in mind?</p>	<p>Theoretically, the ESIG example of DER De-Rate Notification seems sound; however, it is unfortunate that they have had no Proponent participate in their market to practice.</p>
<p>Can the approach described in the ESIG example of DER De-Rate Notification be extended (with tweaks/additions) to address coordination of DERs "stacking" distribution and wholesale services?</p>	<p>The ESIG example would need to be tweaked or augmented when the DER facility / aggregator is optimizing to satisfy the distribution and/or wholesale services (i.e., transmission or IESO market), because the DER facility / aggregator may change their commitment to either stakeholder. Allowing for stacking will, hopefully, benefit all stakeholders rather than one entity alone.</p>

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<p><i>The conceptual T-D coordination protocols for enabling DERs to "stack" services may involve the distribution-level decision to use DERs for NWAs taking place in advance of the IESO's day-ahead market and real-time market processes. How would this align with distribution-level processes/needs?</i></p>	<p>Firstly, if the LDCs and transmitters are the only aggregators or representatives of the DERs to the IESO, within their service domains, the maximum flexibility would exist in ensuring the local and wholesale needs can be met at best cost and dependability. Also, existing systems and protocols would need much less effort to conform to the new market than having to develop and roll-out new ones. Secondly, if non-LDCs or transmitters are the ones interfacing with the IESO, then per the answer to the immediate prior question, then the ESIG DER De-Rate Notification would need modification to gain second best service to the stakeholders. Thirdly, the LDCs and transmitters need to better understand how much unused / captive capacity exists in their systems from technical and financial perspectives and have the tools to manage this and thus gain flexibility to satisfy the wholesale market needs when it's more critical, which bolsters the first point made. Fourthly, there needs to be recognition that NWAs are likely to be capital investment deferral not elimination options in all cases. NWAs will increasingly be important as resources – financial, material or personnel – are finite and will be much less than needed without NWAs. In summary, if the non-LDCs or transmitters decide to favour satisfying the wholesale market and less or not-at-all the local needs, then dependence on them for NWA support would be de-valued. The LDCs and transmitters may then need to rely on their own DERs to dispatch for NWA solutions, which would increase recoverable costs.</p>

# General Comments/Feedback