

# Feedback Form

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

Feedback Provided by:

Name:

Title:

Organization: Non-Wires Solution Working Group (NSWG)

Email:

Date: July 20, 2022

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>Given the different coordination protocols, an additional topic would be to review the need for any new defined terms and identifiers for physical components of the T-D interface and distribution system. For example, will T-D services be determined based on nodal references for the IESO wholesale, or will distribution-based locational identifiers be used for the IESO to view further into the distribution system? Another additional topic would be review of Distribution outage management protocols including how outages are requested and scheduled by LDCs within their systems, but on a planned and forced basis.</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>NSWG requests that an LDC representative provide an overview of their Outage Management System (OMS), its coordination with the IESO, and how outage requests by customers align with the IESO's outage management protocols.</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>The definition of a PNode is an important consideration when determining DER aggregator and single DER De-Rate information. IESO should consider how best to define these interfaces and potentially what phases of interface identifiers might be used to implement DER De-Rate Notification. For example, the 44 kV sub-transmission system seems like a logical initial network to establish the T-D coordination protocols on.</p>

Topic	Feedback
<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>At a high-level, NSWG believes the ESIG example is a good starting point for an approach to addressing coordination of DERs stacking distribution and wholesale services. NSWG is supportive of using offer strategy and adjustments to address changes in pre-dispatch prior to real-time operation.</p> <p>NSWG notes that the MRP 27 hour look ahead period between Day-Ahead Market and Real-Time operation is significantly limiting and adds extreme difficulty to adopting the ESIG example given consistent revisions of schedule in real-time.</p>
<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>NSWG has no comment but supports allowing LDCs to request services prior to day-ahead commitments in the day-ahead market. In general, as long as NWAs are committed to distribution services prior to the lock-up period (i.e., T-2 prior to real-time) the IESO should be able to manage wholesale market operation.</p>

## General Comments/Feedback

A fixed definition for T-D interface from TDWG seems a logical activity to undertake. The link should align with future LMP nodes if possible. This will also provide a logical first step for DER aggregation (e.g., aggregation restricted to same node). NSWG again reiterates the potential to standardize where the IESO-control grid and distribution system interconnect. NSWG would advocate that the standard definition should be the high-side breaker for the transmission station.

Is the expectation of the TDWG deliverables to be a report that is published publicly for all stakeholders to review and comment on? Or is the deliverables of the TDWG to be delivered to the IESO leadership team? A detailed outline of the TDWG deliverables would help provide clarity to the NSWG.