

Feedback Form

Transmission-Distribution Coordination Working Group (TDWG) – September 13, 2022

Feedback Provided by:

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Following the September 13th 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 October 4th, 2022 to 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>Are there circumstances where the distribution system is reconfigured and DER can continue to operate? Does the treatment depend on size of the DER, whether transfer trip is being used, loading on the feeder, etc.?</p>	<p>There are circumstances where the DER can be supplied by an alternate feeder. Typically DER that are <250kW can be fed from an alternate supply without transfer trip. If a DER is >250kW then they can be transferred to an alternate supply if:</p> <ul style="list-style-type: none"> a) They have transfer trip to alternate feeder or b) they can guarantee their output is <50% of the feeders minimum load
<p>Are there circumstances today when the T-D interface or transmission station that a DER is connected to changes due to reconfiguration of the distribution system?</p>	<p>Yes. This happens every day due to outages required for maintenance or capital enhancements.</p>
<p>What operational data about loading, reconfigurations, constraints, DER operations, etc. is being shared between host and embedded distributors today? What method and frequency is used for any data exchanges?</p>	<p>Currently there is not much information (real time telemetry) being shared between the Host Distributor and Embedded Distributor. The agreements between both parties typically indicate that the embedded LDC must contact the Host Distributor and inform them of any load transfers within their system (load and DER). The Host Distributor typically has peripheral views of the entire TX /DX system and can warn the Embedded Distributor of any issues they might not have visibility to. In terms of best practice, it is typical for the Host Distributor to notify the Embedded Distributor of any load transfers or alternate supply points affecting their point of connection.</p> <p>Example of Connection Agreement language below:</p> <p>“Outage Planning <i>OGCC Operating Planning shall be notified of all transfers involving customer load and/or generation supplied from Hydro One</i></p>

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	<p><i>owned stations to ensure that the transfer won't have adverse effects on the distribution system.</i></p> <p>Feeder with Hydro One Customers</p> <p><i>□ Load and/or Generation Transfers: OGCC Operating Planning is accountable for assessing transfers on distribution feeders that have embedded generation and/or load customers connected to them.</i></p> <p>Feeder without Hydro One Customers</p> <p><i>□ Load Transfers: If the customer's load is being transferred to an alternate customer supply feeder (i.e. back to back), the customer is accountable for the assessment of the transfer, and the customer shall formerly advise the OGCC Operating Planning regarding acceptance of the transfer.</i></p> <p><i>□ Generation Transfers: If embedded generation is connected to a customer's section of feeder or to a feeder shared with Hydro One, the customer shall be accountable assessing the generation transfer and shall formerly advise the OGCC Operating Planning regarding acceptance of the transfer."</i></p>
<p>In managing a non-wires alternatives project, when do distributors expect to identify that there is a need to operate DER? How good is distributors' "visibility" into the need in the day-ahead and 3-4 hours prior to real time?</p>	<p>For Planned Outage scenario's we typically would have good visibility and forecasting for when a DER would be required to be dispatched. Typically, System Operations would know of the planned outage approximately 30 days from when the outage was to occur. If DER were required to have a total or partial outage, this would likely be studied and identified weeks before the outage.</p>

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<p>Based on the Joint Utilities of New York DSP Coordination & Communication Manual, are there any notes or considerations that the IESO should bear in mind in drafting conceptual T-D coordination protocols for Ontario?</p>	<p>It was revealed in the discussion that NY DSP did not consider, separately, the role of Host and Embedded Distributors nor a D-D interface. Host and Embedded Distributors (D-D interface), are prevalent in Ontario. Inclusion of the D-D interface in the NY DSP draft protocols would surely provide a significant layer of complexity which may have affected their recommendations and conclusions. We must recognize this is a significant gap between the NY system and our Ontario system in regards to assessing T-D protocols.</p>

General Comments/Feedback

We would be eager to review any draft T-D protocols that may exist, or to participate in an exercise to help develop the draft protocol.