

Feedback Form

Transmission-Distribution Coordination Working Group (TDWG) – November 9, 2022

Feedback Provided by:

Name: Jacob Godfrey

Title: Project Coordinator

Organization: Essex Powerlines Corporation

Email: [REDACTED]

Date: November 29, 2022

Following the November 9th 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 November 30, 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>DER Market Vision and Design Project - T-D Coordination Foundational Questions</p> <p>Are the IESO’s recommendations for T-D coordination appropriate for foundational models? Do any recommendations involve risk for distributors that would inhibit DER(A) participation in wholesale market?</p>	<p>The recommendation for Question 2 that each DER(A) be permitted to become a Registered Market Participant (RMP) is appropriate, as it relieves potential risk from Distributors by not necessitating LDC liability for DER(A) activities in IESO-Administered Markets (IAMs).</p> <p>The recommendations for Question 7 to outline alternative outage conditions and communication processes are appropriate. The final recommendation in Question 7 for determining assurances for DER(A)-LDC communication is also appropriate and highly relevant to Essex Powerlines’ ongoing Grid Innovation Fund project PowerShare. In PowerShare the coordination between DER(A) and LDC is proposed to be governed by a Market Eligibility Rulebook and enforced by a Participant Contract. The ongoing communication requirements are largely related to business information, changes to the DER(A) and planned and forced outages. The project also considers communications via email and phone (including SMS) for dispatch notifications and intends to develop automated dispatch integrations and confirmations with market participants in the future. Any proposed additional communications assurances can be tested in the project, and Essex Powerlines (EPL) is receptive to feedback or proposals on extended cases.</p> <p>Regarding risks, there may be risk in the use of uncoordinated methods or toolsets by Distributors or Transmitters to assess service needs prior to the submission deadlines for the IESO Day-Ahead Market. There may be latitude for implementing reliability targets or incentivizing the sharing of best practices in forecasting between IESO/Transmitters/Distributors.</p>

Topic	Feedback
<p>Hydro One's Distribution-Distribution Coordination</p> <p>Any feedback on Hydro One's presentation?</p>	<p>To echo a theme brought up in the Working Group meeting, the difference between Hydro One acting as the transmitter in a T-D relationship and Hydro One acting as a 'host distributor' in a D-D relationship needs to be defined more clearly if it has any operational impacts.</p> <p>Coordination between IESO, Transmitter, Distributor, and DER(A) is critical. The path of information for offers/bids, dispatches, and system constraints should be organized to provide a single source of truth regardless of express or hybrid feeder setup.</p> <p>Separately, development of ICCP links between IESO, Transmitter, and Distributor could help with constraint automation prior to DAM and contribute to a single source of truth. It is considered valuable to explore what information can be shared.</p>
<p>Conceptual T-D Coordination Protocol for Dual Participation Model</p> <p>Does the draft conceptual T-D protocol for the Dual Participation model presented provide the opportunity for sufficient coordination among parties?</p> <p>Are there any gaps/concerns with the draft T-D protocol presented?</p>	<p>The protocol is largely sufficient and aligns with the market design in PowerShare. The project team has been considering how elements of this protocol can be implemented to test or simulate coordination. EPL is receptive to proposals on extended cases.</p> <p>Of interest to the Non-Wires Alternative (NWA) market being developed in PowerShare and referring to the recommendation for Question 2: the proposed protocol outlines each RMP submitting offers/bids into the market which includes "LDC-directed" or "must operate" quantities which can be constrained by various distribution or transmission levels. Has an alternative model for submission where offers/bids in an NWA market could be forwarded to the IAMs on behalf of the RMP been considered?</p>

General Comments/Feedback

A risk unrelated to the recommendations presented at the November 9 meeting that is prudent to address is the expectations of metering quality, which may be a major impediment to DER(A) participation in NWAs and/or IAMs. Elaborating on what the IESO sees as possible accommodations for DER(A)s is a topic of interest.