Feedback Form

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

Feedback Provided by:

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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.

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Specific Questions for Comment/Feedback

Topic	Feedback
DER Market Vision and Design Project - T-D Coordination Foundational Questions 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?	The recommendation for Question 2 regarding each DER(A) being permitted to become a Registered Market Participant (RMP) aligns with market construct from European pilots in this field. Preferably the liability for DER(A) activities in IESO-Administered Markets (IAMs) should be held by the owner of the DER(A) (e.g., the aggregator/ flexibility provider / technical integrator), not the distributor or the local market operator. Related to the final recommendation in Question 7, PowerShare proposes the coordination between DER(A) and LDC/DSO to be governed by a Market Eligibility Rulebook and enforced by a Participant Contract or, where relevant, by the local flexibility market operator's Rulebook. 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 for dispatch notifications, as well as automated dispatch integrations with market participants through APIs.
Hydro One's Distribution-Distribution Coordination Any feedback on Hydro One's presentation?	As commented in the TDWG, 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. It would also be interesting to explore the potential for D-D relationship between two separate LDCs and the IESO. For example, in Sweden exchange of flexibility resources between two different regional networks has been trialed to resolve network congestion on the TSO network.

Topic	Feedback
Conceptual T-D Coordination Protocol for Dual Participation Model Does the draft conceptual T-D protocol for the Dual Participation model presented provide the opportunity for sufficient coordination among parties? Are there any gaps/concerns with the draft T-D protocol presented?	The protocol is largely sufficient and aligns with the market design in PowerShare. Further to the comment about simplifying "T-D coordination when DER/A coordinate with distributors prior to submitting/updating bids and offers in the IESO's wholesale market", we would argue that this is contingent on a sequential coordination model. In an integrated T-D approach, the sales offer would be unavailable from the market as soon as the order is matched by either party. Regardless of a sequential or integrated T-D model, the "distributor market" would have up to date information about DER(A) availability. Related to "the DER(A) Service Provision Considered", does the IESO only consider NWA (i.e., congestion management) from distribution DER(A) or other services such as voltage control and balancing?

General Comments/Feedback