

Feedback Form

Transmission-Distribution Coordination Working Group (TDWG) – October 27, 2023

Feedback Provided by:

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Following the October 27th 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 17, 2023 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>SOWs and TDWG Objectives</p> <p>Taken together, do the SOWs comprehensively address the objective of the TDWG?</p>	<p>The TDWG objectives listed by the IESO are to “Develop implementation-ready operational protocols, detailing coordination among IESO, LDCs, and DER(A), as DER(A) participate in wholesale market services and may provide services to the distribution system as non-wires alternatives (NWA)”. In NSWG’s view, the SOWs generally support the TDWG objective listed above.</p>

Clarity of SOWs

Are the SOWs clear? Are there areas of the SOWs that need more explanation?

There are a few areas where NSWG believes further refinement is required.

For SOW A: Coordination Protocols. NSWG wants to ensure that the coordination protocols being explored support both dynamic information exchange and static information exchange. In NSWG's view, dynamic information includes real-time operational information exchange between the IESO, DSOs and DER(A)s. Dynamic information exchange would include outages (e.g., generator, transmission, and distribution assets), capacity reductions (e.g., feeder transfer capability reduced), and schedule & dispatch instructions. Just as important in coordination protocols is static information. Static information is information shared between parties that establishes the baseline for the power system. Static information would include DER attributes (e.g., capacity, ramp rate), distribution system capabilities (e.g., transfer capability of feeder under normal operating conditions), and outage planning (i.e., the scheduling and communication of routine or special circumstance system outages). The inclusion of static information is important for coordination protocol for two primary reasons. First, is static information provides a clearly indication of the power systems capabilities including resources connected and operating. Second, static information is an important input for near-term and long-term planning. The SOW should clarify what static information will need to be shared continuously for market participants and system operators to understand base capabilities of the system in addition to dynamic information of real-time operation.

For SOW B1: Functional Assessment appears to be missing what IESO

operational and functional requirements will be needed to support LDCs as they transition into DSOs. This can include functional capabilities to maintain extensive communication with DSOs and DER(A)s. Further, SOW B1 discusses "cost differences analyzed across several dimensions". NSWG is concerned the functional assessment will be hyper-focused on distributor costs and will not consider additional costs (at a high-level) for the IESO and DER(A) participants. When considering costs, all participants and operators should at least be considered as part of the assessment.

For SOW B3: Shared Platform. The concept and objective of the shared platform appears overly broad and not appropriately focused at this stage of development. In the NSWG's view there is clear value in establishing a shared platform for information sharing between the IESO and the multitude of LDCs and potential DSOs. Having separate systems and communication protocols for the IESO and DSOs to maintain is inefficient and likely lead to errors and miscommunications. A shared platform can ensure common requirements and understanding of information sharing expectations. However, the SOW B3 appears to go beyond the initial cost benefits and focus on broader market activities and settlement functions. NSWG is concerned the Shared Platform is being positioned as a platform that would supercede participation in IESO markets for DER(A)s. Specifically, NSWG has concerns with a shared platform concept removing direct access to ISO market functionality and information. For example, if settlement is done through the Shared Platform, what processes are envisioned for disputes that ensure clearly visibility to IESO market outcomes and DSO market functionality.

Topic	Feedback
	NSWG recommends that the Shared Platform remain focused initially on facilitating T-D coordination and market information sharing.
<p>Scope of SOWs</p> <p>Is the scope of each SOW appropriate and comprehensive enough? Are there any areas that should be added to or removed from the SOWs?</p>	See comments above. It would be helpful if the next iteration of SOWs are combined in a single document that also include a comparison of the different components of the SOW. In addition, a single document should describe the interdependences expected between the different SOWs
<p>Work Packages</p> <p>Are the work packages defined for each of the SOWs logically structured?</p>	At this time NSWG agrees with the work packages except for the clarity issues raised in the previous response
<p>Timelines</p> <p>Are the timelines for each Deliverable realistic and achievable?</p>	Yes, at this time the deliverables appear to be realistic and achievable.

Meeting Recordings

Comfort in Recording Meetings

Are you comfortable with the TDWG meetings being recorded for the purpose of referencing immediately following the meetings, to then be deleted and not shared publicly?

Yes, NSWG would prefer that the meetings are recorded and posted for public consumption.

General Comments/Feedback

General Comments/Feedback

The evolution of the TDWG activities to include different streams and SOW deliverables that provide a broader pictures of the actions being taken to achieve the TDWG objectives are very helpful and provide NSWG with greater confidence that the process will be moving ahead.

Again, the NSWG recommends that there are many coordination activities and investments that can be initiated now to support the more complex coordination and communication protocols required for a DSO. For example, LDCs should be investing in the ability to see in real-time major distribution system capabilities and be working on how to share that information with DERs to help with siting and investment decisions now while early development of DERs are starting.