

Proposed updates to Market Rule Appendices 4.2 and 4.3

Feedback Form

March 31, 2020

Date Submitted: *2020/04/21*

Feedback Provided By:

Company Name: TC Energy

Contact Name: Charles Conrad

Contact Email: [REDACTED]

Following the March 31, 2020 webinar to discuss the proposed updates to Market Rule Appendices 4.2 and 4.3, the IESO is seeking feedback from participants on the proposed updates to market rule appendices 4.2 and 4.3.

The IESO will work to consider feedback and incorporate comments as appropriate and post responses on the engagement webpage.

The referenced presentation and design document can be found under the March 31, 2020 entry on the [Updates to Performance Requirements webpage](#).

Please provide feedback by April 21, 2020 to engagement@ieso.ca. Please use subject: *Feedback: Proposed updates to Market Rule Appendices 4.2 and 4.3.*

To promote transparency, this feedback will be posted on the [Updates to Performance Requirements webpage](#) unless otherwise requested by the sender.

Thank you for your time.

Topic	Feedback
Proposed updates to market rule appendix 4.2.	General agreement with the changes proposed in Appendix 4.2
Proposed updates to market rule appendix 4.3.	<p>TC Energy’s understanding is that the control capability for reliability services (e.g., voltage ride-through) of existing inverters is a software issue which in many cases would not require capital investment in new inverter hardware. For example, a software patch could be uploaded to the inverter controls to allow the existing hardware to provide the capabilities. Alternatively, the inverter may already have the capability, but it is disabled since it was not a requirement previously.</p> <p>Based on the IESO’s rationale for making the appendix 4.3 amendments (i.e., the conclusions of the 2019 Operability Assessment) and the minimal cost of performing software upgrades/adjustments; TC Energy recommends that the IESO consider grandfathering of the previous connection requirements only for equipment that can demonstrate that beyond-reasonable investments would be required for compliance. As market design and participation requirements consistently evolve over time, the IESO should consider the negative precedent of grandfathering changes that do not require material investment to enact or have any likely negative operational impacts for the asset owner, and which would otherwise improve system reliability.</p> <p>If not automatically grandfathering all pre-existing subject DERs/LDUs/facilities is too administratively burdensome, the IESO could consider using size criteria to scope the exercise to a manageable effort while still improving reliability. Less ideally, a voluntary program encouraging and perhaps assisting the larger grandfathered subject DERs/LDUs/facilities to</p>

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	update settings appropriately where it is practical and straightforward to do so could also be of some benefit.

General Comments/Feedback: