

## **Feedback on November 19, 2004 CRSC meeting from OPGI**

### **Comments on Break down of Charge Types to Support the DAM Implementation**

#### A-GENERAL PRINCIPLES FOR CHARGE CODE FORMULATION

1. Since we are used to handling about a hundred CCs with different formulae, it is not much of an incremental problem per se to deal with e.g. 200 CCs. It would help to err on the side of using a new CC rather than amalgamation of quantities and amounts.
2. It is important to maintain the clarity of information provided in a given charge code to minimize the software hiccups while there is an effort towards “information compression” techniques.
3. Approximately 10000 Rows\*35 Columns matrix is available, effort should be made to maintain uniqueness of records. The single line item amounts should be as discrete as possible, presented with the associated dependent variables.
4. Different CCs should be used where the allocation base is different.
5. XML format may be technically superior to the current file format, however, the timing of this change is an issue. Given that the IT systems are currently based on the old format and working fine; and, major changes are in the offing due to Bill 100 and DAM; this may not be the best time to change over to the XML file format. Providing the Market Participants with an optional XML format is probably more practical.

#### B-SPECIFIC COMMENTS ON BREAK-DOWN OF CHARGE TYPES

1. In order for a market participant to perform an automated parallel settlement calculation to the IMOs, independent of the settlement statement, a single charge code should only be used for items of different formulation if the use of the different formula is linked only to the static data such as
  - CMSC for resources registered as loads vs generators
  - Energy for dispatchable and non-dispatchable resourcesA counterexample where different formulations causes problems is the two forms of a charge code, viz. direct calculation and its per unit allocation form. There is no information in the supporting data to determine that per unit allocation formulation is appropriate.
2. Our preference would be to use new charge codes for all First Settlements items, and for the new items in the Second Settlement (e.g. Uplifts, CMSC balancing, PCG Adjustment, etc). Following are responses to IMO’s specific questions:
  - Pass 2 Imports should not be a part of Pass 3 Import Charge Type.
  - Pass 2 Import Uplift surplus or deficit should be two separate charge types since the allocation bases are different.
  - PCG for Pass 2 imports should be separate since it has a unique formula and unique data source.

3. The use of flags for Preliminary and Final values has caused some IT problems in the RT market. For example, we have to submit a monthly GSS Reimbursement claim where it was cumbersome to deal with the C,P, and F flags. It would help to avoid the use of flags to differentiate the DAM amount and the RT amounts, specifically where the column 9 is "NO" (e.g. formula for HPST amalgamates HPSTA(1)).
4. The current flag system uses different presentation of amount vs. quantities. If there is no choice but to use flags between DAM and RT, it would be preferable not to use the current presentation of Qs and \$s as done with the C and F flags (\$=incremental, and Q=total); a consistent presentation should be used.
5. The "Hourly Uplift" appears to have evolved over time; and, there is no clear indication of the allocation base in the statement. For Uplifts, 3 different CCs should be used for Hourly uplift when the "Hourly Uplift" may use hourly, daily or monthly AQEWs.
6. For analysis such as subdividing energy revenue in the statements into categories such as AQEI/AQEW/SQEI/SQEW/BCQs/BCQb we have been able to use the presence of particular datafields as the filter. So a line item with AQEI datafield is assigned as generation revenue. One area where there is some overlap is PBCs at OPG locations, where we can have both a BCQs and AQEI entry making the allocation of the revenue ambiguous, but we have generally been able to avoid this ambiguity by locating the PBC at a location not owned by OPG. The lesson from this is that we want to avoid having more than one variant in a single record.
7. When transaction IDs are identified for a charge, participants would like to have access to the nature of the market charge (confidentiality must be retained). At the moment, no information is divulged by IMO either as part of the statement, or in response to participant queries.
8. The data items within the statement line item should be such that they can be compared with check sources such as published schedules, prices, metered amounts. The CMSC line items present the operating profits which cannot be directly compared. The schedules and metered results would be more useful for reconciliation.
9. For uplift calculations, separate values of market AQEW and SQEW, rather than their sum, would be helpful for a number of reasons, such as analyzing market trends or providing running estimates of BPPR.
10. Uplift calculation base should be identified distinctly in a cell, e.g. separately identify DAM load and RT load.
11. Breakdown of the DAM amounts should be on the same resolution as the RT amounts for the same charge type.
12. Need to identify both the DP and the lcid in the statement file.
13. How will the IMO identify Dispatchable, Non-Dispatchable, Price-Sensitive, Price-Responsive combinations in the statement and data-files?
14. MP line items were expected to be exceptions, and a unique format for them was accepted. Now that we know they are a regular feature of statements, they should be formatted so that they can be parsed just like DP items and treated in a similar way by participant tools . This means 35 column format, location id where

appropriate. The information in the description field in MP line items is often too brief to be useful.

15. For MP line items, the geographic and time resolution should be identified to facilitate analysis and reporting.
16. Operating reserve prices should be reported in the datafile.