

Uninstructed Deviation Comments

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OMS Market and Tariffs Work Group staff

Staff comments only¹ – These comments do not reflect any State Commission or the OMS Board

The professional staff of the OMS Markets and Tariff Work Group (MTWG) have concerns with the IMM's proposed tariff solution to reduce the uplift payments due to some "bad players" who do not follow set point instructions. In summary, the IMM's solution appears to be contrary to the issue of uplift and possibly could increase deviation notifications and cause other financial issues at a plant, MISO operational distractions, or in settlements.

The OMS MTWG do appreciate the attempt to correct the behavior of some plant operators who flagrantly do move and "drag" toward set points to increase their respective plant's revenue. The current enforcement procedure and financial settlement time period is not adequate as noted by the IMM's report. The solution includes two parts. The first of which is the settlement period. The proposed move toward a five-minute settlement period instead of an hour would be the best and most likely solution than just tightening the tolerance band width. Whether the settlement period is 5 minutes, or 15 minutes, it is not as important as to just moving substantially more than once per hour. The period of settlement vs. operational points is another analysis.

The second solution concerns two issues with the plant's operation, the bandwidth and the real time notification of unit capability. First of all the bandwidth proposal is too "tight." The proposed tightening of the bandwidth from 8% to less than 1%, per the IMM illustration, is beyond the physical capability of control for most fossil steam units. The IMM recognizes coal mills and time to deviate around mills coming off and on. However, he ignores a range of other issues that may include, but are not limited to are: pollution control devices and materials, emission monitoring, boiler water levels, steam pressure and temperatures, fuel moisture, etc. The 1% illustrated by the IMM (or 2MW) is beyond the control functions of most large coal units. The solution should be several times larger, such as 5% or 6% but should consider the time period(s).

The second part of a plant's notification seems not to have any real defined boundary limits of what constitutes a capability limit (absolute) and ramp up/down capability change of a plant unit operations. There are many sub-hourly limit changes due to individual equipment capability, thermal conditions, pollution control management, etc. The proposed change notification recommendation should also consider the change in magnitude, frequency of change and duration of change.

In summary, the "dragging" issue should be address with use of a "time periods of deviation of response" criteria rather than tightening the absolute MW set point bandwidth.

¹ Randy Rismiller—Manager of the Federal Policy Program for the Illinois Commerce Commission and member of the OMS Resources Work Group—did not participate in the drafting of these comments, and takes no position at this time on the issues and matters addressed herein.