ATTACHMENT III

Seams Issues - High Priority Items

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
1	 Transaction Check-Out How often and when Schedule changes due to failure 	Day-Ahead: Check-out timeframe to be determined. IMO will perform an advisory check-out based on the pre-dispatch schedules. Because the pre-dispatch is non- binding, the IMO will not adjust schedules for check-out failures.	<u>Day-Ahead</u> : Check-out performed after 12:00. Failed transactions are not included in the day-ahead unit commitment. Corrections to NERC tags can be submitted before 14:00.	Day-Ahead: All transaction information is required to be submitted by 5:00 AM the day before. The Check- out is started subsequent to the 11:00 AM posting of the Day- Ahead unit commitment. The NYISO check-out with all neighboring control areas is typically completed by 18:00.	<u>Day-Ahead</u> : Check-out performed by 12:00. All information is required by 1400 for day-ahead transactions.	 Adequate notification. Timely reinstatement.
		<u>In-Day Hourly</u> : Check-out performed between 40 minutes to the hour and the start of the hour.	In-Day Hourly: Check-out performed between 30 minutes to the hour and start of the hour.	In-Day Hourly: Hourly transaction information is required to be submitted by 90 minutes prior to each hour. The Check-out is performed between 30 minutes to the hour and the start of the hour.	In-Day Hourly: Check-out with NYISO between 45 minutes to the hour and start of the hour. Running schedules checked 2 times/day at NYISO shift change.	 Rules and procedures that allow for economic choices and options by participants
		<u>Notification Method</u> : by phone	<u>Notification Method</u> : by phone	Notification Method: by email & the MIS	Notification Method: by phone & EES/eData	

Rank	Business Practice	IMO	ISO-NE	NYISO	РЈМ	Characteristics of
	Inventory Item	(Based on Anticipated Rules				preferred practice
		at Market Startup)				
	Check-Out Cont	 Transaction Check-out Rules. Transactions agreed upon using the NERC Tag. Transaction will fail for a 	 Transaction Check-out Rules. Transactions agreed upon using the NERC Tag. NYISO MIS number used only if 	 Transaction check-out Rules. Transactions agreed upon with PJM using the NYISO MIS number. The Check with all 	 Transaction check-out Rules. Transactions agreed upon with the NYISO using their MIS numbering. Market 	
		 NERC Tag Mismatch or if one of the Control Areas does not have the contract. For MW quantity mismatches, the transaction will be scheduled to the lowest value accepted by the affected Control Areas 	 NY cannot locate transaction. Transaction will fail for a NERC Tag Mismatch or if one of the Control Areas does not have the contract. For MW quantity mismatches, the transaction will be scheduled to the lowest value accepted by the affected Control Areas. 	 other ISOs is by NERC tag. Transaction will fail for a NERC Tag Mismatch or if one of the Control Areas does not have the contract. For MW quantity mismatches, the transaction will be scheduled to the lowest value accepted by the affected Control Areas. 	 Participants are submitting the NY MIS number to PJM as part of their transaction request. For MW quantity mismatches, the transaction will be scheduled to the lowest value accepted by the affected Control Areas. A linked NERC tag is required. 	
		Reinstatement Options: Day-Ahead – None Hourly – Corrections must be submitted prior to the next evaluation period. Hourly evaluation begins with the development of the relevant pre- dispatch schedule. This schedule is published at T-40 and includes the Interchange Schedules for each participant.	Reinstatement Options: Day-Ahead – Failures due to NERC Tag Mismatch can be corrected prior to 16:00. Hourly – Failed transactions from the Day-Ahead may be resubmitted to the In-Day Hourly evaluation up to 90 minutes before each hour of the next day.	Reinstatement Options: Day-Ahead – Corrections may be made and submitted into the Hour-Ahead evaluation (up to 90 minutes before each hour of the next day). Hourly – Corrections may be submitted into the MIS 90 minutes before each hour, for the next Hour-Ahead evaluation.	Reinstatement Options: Day-Ahead – Transaction owners have 60 Minutes from notification (but no later than 14:00) to make corrections when notified of a failed transaction. PJM will make 2 phone attempts to correct errors with the market participant. Hourly – Transaction owners have up to 20 minutes prior to the hour to change or correct transactions.	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Transaction Check-Out Cont	The IMO confirms schedule data with the participant and the participant provides the NERC tag to accompany the transaction. The IMO coordinates with other scheduling entities to ensure transaction reliability. Any IS modifications resulting from this process will be communicated back to the participant verbally. Reference:	Transactions that initially fail the check-out may be reinstated prior to the start of the hour, as time permits when the discrepancy can be resolved among the affected ISO Control Areas.	Transactions that initially fail the check-out may be reinstated prior to the start of the hour, as time permits when the discrepancy can be resolved among the affected ISO Control Areas.	Reference:	
			Transmission Business Practices Transmission Business Process Summary MRP 4 - Submittal of Bilateral Contracts MRP 5 - Energy Market MRP 3 - Bidding	Transmission and Dispatching Operations – 4.1.3 Interchange Scheduling	PJM Manual for Scheduling Operations, Section 5.	

Rank	Business Practice	IMO	ISO-NE	NYISO	РЈМ	Characteristics of
	Inventory Item	(Based on Anticipated Rules				preferred practice
		at Market Startup)				
2	Ramping of Interchange Transactions	Ramp Limit: There are no net interchange ramp restrictions in the Ontario market. The 5-minute real-time dispatch along with the contracted AGC will provide for any expected net interchange.	Ramp Limit: No Day ahead ramp limit on individual interchange transactions. Real time net schedule change with adjacent Control Areas is limited to 600 MWs with exceptions	Ramp Limit: The net scheduled interchange ramp limit is nominally 700 MWs in 10 minutes across the top of the hour, however the limit may vary depending on system conditions during the dispatch day.	Ramp Limit: The ramp of scheduled transactions is limited to a net of 500 MWs. NY interface ramp limit is 1000 MWs	 Maximum flexibility, shortest time-frame, and greater amount (MWs). More frequent schedule changes.
		<u>Frequency of Ramping</u> : 1 per hour	<u>Frequency of Ramping</u> : 1 per hour	<u>Frequency of Ramping</u> : 1 per hour	Frequency of Ramping: 4 per hour - Allow 500MW net schedule change every 15 minutes	 Equitable allocation method. Increased degree of coordination
		Allocation of Ramping Capability:	Allocation of Ramping Capability:	Allocation of Ramping Capability	Allocation of Ramping Capability:	
		Assigned in economic order	Assigned using NERC policy.	Assigned using NERC priority and economic order.	Assigned on a first come, first serve basis using a timestamp.	
		<u>Reference</u> : Market Rules Chapter 7 Appendix 7.1-3	<u>Reference</u> : System Operating Procedure (SOP) 11 - Sections 5.3.1 and 5.3.2 Located at <u>http://www.iso- ne.com/dsop</u>	Reference: NYISO Ancillary Services Manual, Attachment C – Section Titled Ramped Desired Net Interchange	<u>Reference</u> : Operating Agreement Sched 1, 1.10.6 (b)	

Rank	Business Practice	IMO	ISO-NE	NYISO	PJM	Characteristics of
	Inventory Item	(Based on Anticipated Rules				preferred practice
		at Market Startup)				
3	Transaction	Transmission Reservations:	Transmission Reservations:	Transmission Reservations:	Transmission Reservations:	1. Minimize
	Scheduling	Transmission cannot be reserved	The Restated NEPOOL	Transmission reservations are	Point-to-Point Service - Long	transmission
		in Ontario. Transmission access	Agreement (RNA) covers internal	not used in the NYISO system.	Term Firm (>1 year), Short Term	reservation time.
	 Transmission 	is not explicitly allocated and	service, therefore no reservation	The NYISO tariff provides for	Firm (Monthly, Weekly, Daily),	
	Service	physical transmission reservation	is required for internal	Firm and Non-Firm Point-To-	Non-Firm (Monthly, Weekly,	2. Maximize the use
		is not required. Access to the	transmission.	Point Transmission Service over	Daily, Hourly, On-Peak, Off-	of the available
	 Implementation 	Ontario transmission system is	Deservations are required for	the transmission facilities of the	Peak), Network Service, Fixed	transmission
	Rules	based on the outcome of the	Reservations are required for	parties to the ISO/IO Agreement.	I ransmission Rights (FIR)	capacity.
		uses the prices provided in the	through the NEROOL control	process is not used since	Auctions, Mansmission loading	2 Fower schoduling
		"energy" offers and hids only A	area All external transactions	transmission service is	Apeillary Services	s. Tewer scheduling
		"winning" energy offer or bid	are tracked via their NERC tag	assigned to accepted	Anemary Services.	1630100013.
		receives the associated		transaction bids through the	Transmission service may be	4 Maximize the
		transmission access.		SCUC and BME evaluation and	reserved up to 30 minutes prior	ability to change.
				scheduling process.	to each hour.	
		NERC Transmission Priority:	NERC Transmission Priority:	NERC Transmission Priority:	NERC Transmission Priority:	5. Ease of
		All Interchange Schedules will be	The Transaction priority is	The Transaction priority is	NERC priorities are set based	transaction
		"tagged" with the NERC NF-7	assigned as a result of the	assigned when the Market	on the type of service purchased	scheduling across
		Firm transmission designation.	OASIS transmission reservation.	Participant enters the transaction	from PJM, firm or non-firm, and	regional
		C C	The type of service (Firm or Non-	into the MIS. Transactions may	then by the length of the service	boundaries.
			Firm), and duration (monthly,	be submitted to the MIS via the	purchased. NERC has no	
			weekly, daily) define the priority.	Web as Firm (NERC Level 7) or	defined priority for the PJM	
				Non-firm (NERC Levels 1 – 6).	service to pay through	
					congestion.	
		Reference:	Reference:	Reference:	Reference:	
		Market Rules Chanter 7	Made in accordance with	OATT Section II Point-To-Point	OATT & Regional Transmission	
		Appendix 7.5		Transmission Service & III Network	and Energy Scheduling	
				Integration Transmission Service	Practices.	
			TSO - General Business	Integration transmission bervice		
			Practices Section 2.4.3.			

Rank	Business Practice	IMO	ISO-NE	NYISO	PJM	Characteristics of
	Inventory Item	(Based on Anticipated Rules				preferred practice
		at Market Startup)				
	Transaction	Transaction Scheduling and	Transaction Scheduling and	Transaction Scheduling and	Transaction Scheduling and	
	Scheduling Cont	Restrictions:	Restrictions:	Restrictions:	Restrictions:	
		There are no physical party to	Day-Ahead transactions must be	New transactions may be	All transactions may be changed	
		party transactions in the Ontario	submitted by 12:00 the day	submitted in the DAM and/or the	by the transaction owner up to 30	
		market, only offers to sell and	before and must include the	HAM up to 15 days in advance,	minutes prior to each hour. A	
		bids to buy from the spot-market.	associated transmission	however an advanced	change to a Day-Ahead	
			reservation in order for it to be	submission does not give the	transaction schedule will assign a	
		All offers may be changed	included in the Day-Ahead unit	transaction a scheduling priority.	new timestamp to it. PJM	
		without restriction up to 4 hours	commitment. No changes are	All transactions may be revised	internal ramp priority and	
		prior to each dispatch hour.	allowed to a Day-Ahead	up to the closing time of each	curtailment priority consider	
		From 4 hours out to 2 hours out,	transaction except to correct a	DAM or HAM evaluation period.	timestamp.	
		offers may be changed on price	NERC tag or for transactions			
		and/or quantity by no more than	supplied from a generator that	DAM transactions may also be	In order to flow, transactions must	
		+/- 10%. At less than 2 hours,	has tripped.	revised after the 11:00 AM	have a valid NERC Tag,	
		offers can only be changed with		posting of the day-ahead	transmission path and	
		ISO approval.	In order to flow, a transaction	schedule and prior to the close of	associated Transmission service	
			must be schedule either day	each Hour-Ahead evaluation	reservation. In addition, the PJM	
		Participants may submit standing	ahead or on Short Notice, and it	period. Unchanged or	control area must have sufficient	
		offers/bids which remain valid	must be confirmed with the	unchanged portions of DAM	ramp capability and the	
		until they are removed by the	neighboring control areas. While	transactions are given scheduling	transaction must be confirmed	
		participant.	not incorporated in the day	priority in the Hour-Ahead	with the neighboring control	
			ahead scheduling restrictions,	Evaluation over HAM only	areas.	
		In order to flow, transactions must	ISO-NE must have sufficient	transactions.		
		have a valid NERC Tag and their	ramp capability in real-time (600			
		transaction must successfully	MW net interchange limit with	In order to flow, a transaction		
		pass the inter-CA scheduling	adjacent control areas).	must be scheduled by BME and		
		process. There are no ramp	_	it must be confirmed with the		
		restrictions imposed by the IMO	Short Notice (Hourly)	neighboring control areas.		
		administered markets but the	transactions must be submitted			
		scheduling process may result in	90 minutes before each hour and			
		a reduction due to another CA's	must be accompanied by a valid			
		restrictions.	transmission reservation.			

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	Transaction Scheduling Cont	Reference: Chapter 7 section 3.4.1 and Chapter 8 section 2.1.2 of Market Rules.	Reference: Transmission Business Practices Transmission Business Process Summary MRP 4 - Submittal of Bilateral Contracts MRP 5 – Energy Market MRP 3 – Bidding	Reference: Market Services Tariff, Attachment B, Section III. Bilateral Transaction Bidding, Scheduling And Curtailment	Reference: Scheduling Manual, Section 5.	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
4	Transaction	Rules:	Rules:	Rules:	Rules:	1. Adequate
	Curtailment	Inter-ISO curtailment rules are still	Curtailments are performed in	Real-Time/In-hour Curtailments:	Transmission users may choose	notification.
		under development. The IMO will	accordance with NEPOOL	Non-Firm Transactions (NERC	curtailment or pay through	
	 Rules 	curtail inter-tie transactions	O.A.T.T. and General Business	Level 1-6) are curtailed when	congestion.	2. Timely
		consistent with good utility	Practices Section 1.5.5	congestion occurs between the		reinstatement.
	 Notification 	practice and in accordance with	The order of curtailments for	contracts source and sink.	When transmission is curtailed,	
		industry policy such as NERC	transactions to NY are: short		non-firm customers indicating	3. Rules and
		TLR.	notice (first), then dispatchable	Firm Transactions (NERC Level	that they are not willing to pay	procedures that
			and must take transactions are	7) are curtailed for system	congestion will be curtailed	allow for economic
		Curtailments within the hour for	curtailed in order of transmission	security.		choices and
		security will be made when	priority.			options by
		generation and/or dispatchable		Transactions of equal priorities		participants.
		loads within Ontario cannot be		are selected for curtailment using		
		dispatched to solve the security		decremental bids and		4. Transparency of
		constraint.		curtailments within equal		information.
				decremental bids are curtailed		
				on a prorated basis.		
		Notification:	Notification:	Notification:	Notification:	5. Minimize
		Notifications are made by phone	For in hour curtailments, the	A transaction specific email is	The PJM Transaction Dispatcher	curtailments
		and as soon as possible.	parties are notified through the	sent to owners of the affected	calls the PJM Market Participant.	resulting from
			tag adjustment software.	transactions & a generic	I his applies when PJM is either	errors.
				curtailment message is posted to	the source or sink.	
				the web.		
			I	1	I	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	PJM	Characteristics of preferred practice
		<u>Reference</u> :	Reference: O.A.T.T. General Business Practices Section 1.5.5	Reference: OATT Section 13.6, 14.7 & 33.0 Attachment I. Section III	Reference: OATT 1.7, 13.6, 14.7, 33. Manual for Scheduling	
				Transmission Service Curtailment	Operations Sect. 5	
5	ATC	 <u>Frequency of Updates</u>: The IMO is not posting ATC on OASIS, but a similar quantity will be forecast for use in the financial transmission rights market. Daily posting of transmission capability will be available through System Status Reports. Updated: a) 2 days out b) 1 day out at 5:30 and 10:30 based on the predispatch evaluation c) In real-time during the dispatch day. 	Frequency of Updates: ATC is decremented by acceptance of OASIS requests until noon day-ahead of contract. After the day-ahead evaluation, unscheduled reservations are added to ATC for Short Notice (Hourly) reservations. ISO-NE posts an "IN ATC" and an "OUT ATC" which are not netted and are posted by interface.	 <u>Frequency of Updates:</u> ATC/TTC calculated and posted on the NYISO OASIS for each interface in the NY control area. Updated: a) Day-Ahead with the 11:00 AM SCUC posting. b) Hourly based on transactions accepted through the BME Hour-ahead posting. 	 <u>Frequency of Updates</u>: Posts TTC, firm and non-firm ATC for 27 transmission paths. Updated: a) every business day for the next 7 days b) weekly for the next 4 weeks c) monthly for the next 12 months. Updates maybe made more frequently as needed. 	 Timely notification when TTCs change. Frequent updates of TTCs to reflect the current system configuration. Equivalent base assumptions in TTC calculations among the Control Areas.

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
		<u>Base Assumptions</u> :	Base Assumptions: Calculation of the ATC is in the OASIS Related Document relating to Total Transmission Capability (TTC), Transmission Reliability Margin (TRM), and Available Transmission Capability (ATC). Base calculation of TTC begins with all lines in-service and then accounts for specific line outages. The TTC is then decremented for reservations to obtain the ATC.	Base Assumptions: Transfer Capability of the transmission network is limited by physical and electrical characteristics of the system including thermal, equipment loading, voltage and stability considerations. Transfer capability is evaluated based on base system loading and an assessment of critical contingencies on the Transmission System.	Base Assumptions: PJM limits transfers so as to not exceed first contingency total transfer capability. Paths with low activity may initially be restricted to a nominal conservative value. If forecasted conditions remain unchanged, TTC and ATC will increase as the time frame decreases, due to a reduction of margins. Through paths are the lower of the individual path calculations.	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	ATC Cont		The critical contingencies will be	The critical contingencies will be	Transfer capability depends on	
			defined as appropriate using guidelines set forth in ISO Procedures. Determination of ATC will require, in all cases, that base system conditions and expected generation levels be identified and modeled for the period being analyzed. These conditions will include projected customer demand, anticipated transmission system facility availability, accepted transactions, and information about neighboring control areas that affect the transfer capability. The ISO's calculation of transfer capability will be consistent with NERC principles.	defined as appropriate using guidelines set forth in ISO Procedures. Determination of ATC will require, in all cases, that base system conditions be identified and modeled for the period being analyzed. These conditions will include projected customer Demand, anticipated Transmission System facility availability, accepted Energy Transactions for the NYCA, and information about neighboring regions that affect the Transfer Capability of the NYCA. The ISO's calculation of Transfer Capability will be consistent with NERC principles.	projections of system conditions including system topology, generation dispatch, load and transactions. Regional coordination of transfer capability is done through a number of data exchanges to promote accurate ATC calculations. This does not involve posting the lowest result of ATC paths on separate OASIS sites. A portion of TTC is set aside for Transmission Reliability Margin composed of Load forecast uncertainty, loop flow, and normal operating margins. Load forecast margin is applied to Firm ATC with PJM as the sink and is 2.2% for the first day and 6% thereafter. Loop flow margin is applied to Firm ATC when PJM is the source or sink and is based on historical loop flows. Normal Operating margin is applied to Firm and Non-Firm ATC when PJM is the source or sink and is set as 5% of the base TTC.	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
		at Market Startup)				
	ATC Cont	<u>Reference</u> : Chapter 8, Section 4.7 of Market Rules. Chapter 7, Section 12 – Deviation of transmission ratings from normal values.	Reference: OASIS Related Document, <u>Total</u> <u>Transmission Capability (TTC),</u> <u>Transmission Reliability Margin</u> (TRM), and Available <u>Transmission Capability (ATC)</u>	Reference: OATT, Attachment C - Methodology To Assess Available Transfer Capability	<u>Reference</u> : Manual for Transmission Service Request Section 2 OATT 15.2	
6	Capacity Market	There will not be a capacity market in Ontario at market opening. One is contemplated, if IMO Board determines that future reliability is deemed to be in jeopardy. [See Chapter 7 section 10 of Market Rules.]	The auction market has been eliminated, but the requirement remains. A deficiency charge of \$0.17/kW Month.	The NYISO determines the ICAP requirement for an LSE for each six month capability period. The LSE may contract directly with a qualified ICAP provider to meet some or all of its ICAP requirement. ICAP may also be purchased through the NYISO's ICAP auction in 1 month blocks and up to a maximum of 6 months. During the capability period, an LSE that is deficient in ICAP, may seek-out and contract for additional ICAP to meet their deficiency. If the LSE remains deficient, ICAP will be purchased for them via the NYISO's ICAP deficiency auction. <u>Market Services Tariff, Section 5.12</u> - 5.15	Monthly. Daily markets for unforced Capacity Credits Operating Agreement Schedule 11	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
7	Recall of Capacity See the MOU Website – <u>ISO</u> <u>Emergency</u> <u>Procedures</u> <u>Comparison Chart</u> for the steps each ISO follows in an emergency and were Recall of Capacity fits in that sequence.	Ontario's capacity market (when implemented) is unlike the ICAP markets others in the MOU employ. There is no recall "capacity" in the operation of the Ontario market. Export energy that has been offered into and accepted by the IMO Operating Reserve (OR) market can however be withdrawn if OR energy activation is required.	Recallable Energy Types: E1 – Is recallable with 10- minutes notice E2 – Is Capacity Backed and sold above and beyond reserves Will Recall ISO-NE Contract Energy to restore 10 Minute Reserves. Will Recall Non-ISO-NE Contract energy as a last step, prior to shedding load.	The NYISO follows established procedures, consistent with maintaining the reliability of the NYS Transmission System, to eliminate shortages in total operating reserves by exercising its discretion to purchase emergency energy or curtail an ICAP transaction.	In Emergencies, energy scheduled external to PJM from capacity resources is recalled.	 Common ICAP rules and definitions across all ISOs. Provide the ability to register generators as ICAP providers in multiple markets.
		<u>Reference</u> :	Reference: Recalled Under OP4 MRP - 4 Submittal of Bilateral Contracts - section 4.3.3.A	Reference: Market Services Tariff, Section 5.12.7 - Recall Procedures	Reference: Operating Agreement p. 118F.	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
8	Trading Hubs	<u>Trading Hubs</u> : No	<u>Trading Hubs</u> : No	<u>Trading Hubs</u> : No	<u>Trading Hubs</u> : Yes, PJM has Three Trading Hubs. They are West, Western Interface, and East.	 Establish hubs that will encourage liquid futures markets.
		<u>Reference</u> : NA	Reference: NA	Reference: NA	Reference: Regional Transmission and Energy Scheduling Practices.	 Provide settlements systems that accommodate hubs. Establish hubs that will facilitate virtual trading.

Seams Issues - Remaining Items from the 8/22/2000 Meeting

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	User Interface	Dispatch signals and verification of use are communicated over frame-relay connection using combination of ICCP protocol and web-based dispatch - details in Participant Technical Reference Manual at <u>www.theIMO.com</u> See Appendix 2.2 section 1.3.1 of Market Pulos	Internet based interface that will be either home grown or derivation of existing ESCA product	MIS/OASIS Public & Secured Internet-based system for submitting, changing and reviewing Generator Bids, Load Bids, and Transaction Bids (schedules).		
	Market Interface	Market information exchanged via Market Participant Interface - an internet-based interface to perform all market functions - details in Participant Technical Reference Manual at <u>www.theIMO.com</u> Appendix 2.2 section 1.4.1 of Market Rules		Same as User Interface		

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	Hedging Mechanism	The voluntary Day-Ahead market, specified in Chapter 8 section 3 of Market Rules, is deferred for market opening date but, when in-service, will provide day ahead price hedging . Physical Bilateral contracts permit hedging against real-time market spot prices. Chapter 8, Section 2 of Market Rules. Financial Bilaterals are permitted outside the market. The IMO will be opening the market with a Financial Transmission Rights market which is a financial instrument and an opportunity for participants to hedge against the cost of inter-ISO congestion. Market Rules Chapter 10 sections 2,3 & 4 Chapter 8	The Day-Ahead market provides a hedging mechanism for energy and ancillary reserve services. MR&P 2	Day-Ahead Market The Day-Ahead market issues forward contracts which provide a hedging mechanism for energy purchases in real-time.	The Day-Ahead market provides a hedging mechanism for energy purchases in real-time. Fixed Transmission Rights (FTRs) also provide hedging against Locational Marginal Price (LMP) charges. Operating Agreement Schedule 1, Section 1.10 & Open Access Transmission Tariff Attachment K, Section B.	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Balancing Generator/Load	Generation and Load is balanced by dispatching both generation and dispatchable load based on offers to sell and bids to buy. Suppliers offer, consumers bid. Chapter 7 section 6 of Market Rules.	Imbalance between Day Ahead and real time are quantified and payment/receipts for imbalance is based upon Real Time Prices. Exception, AGC Lost Opportunity.	Real-Time Spot Market The NYISO balances generation and load in real-time using the spot market. LBMPs are calculated nominally every 5 minutes.	PJM balances generation and load in real-time using the spot market. Participants are not required to submit balanced bids. Operating Agreement Schedule 1 Section 1.11.1	

Rank Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	PJM	Characteristics of preferred practice
Bilateral	The Ontario Physical Bilateral	Transactions can between a	Bilateral transactions may be	Market Participants may enter	
Transaction Market	Contract is a participant to participant "financial" mechanism and is not a physical dispatch contract. In general terms, physical bilateral contract data is submitted to the IMO and the contract parties will have their energy component (injection/withdraw) removed from the IMO settlement process. Physical bilateral contract data may be submitted to the IMO no earlier than 7 days prior to the dispatch day and no later than the 6 days after the dispatch day. Chapter 8, Section 2 of the market rules.	NEPOOL Participant and a non- Participant. Transactions for energy, capacity, obligation, & requirements.	scheduled within, into, out-of or though New York and must be submitted to the MIS every day/hour they are to be scheduled. The financial terms of a bilateral are private and are not known by the ISO. Exports can supply a Sink Price Cap and Imports/Wheel-Throughs can supply a Decremental Bid with their transactions. This allows the transaction owner to self- curtail the transaction at a specified price during the SCUC or BME evaluation. <u>Technical Bulletin #20 - Decremental Bids for Import and Wheel-Through Transactions</u> <u>Technical Bulletin #52 – Sink Price</u>	into bilateral contracts for the purchase or sale of electric energy to or from each other or any other entity. Bilateral arrangements shall be reported to and coordinated with the Office of Interconnection. Operating Agreement Schedule 1. 1.10.7, 1.7.4 (d), 1.7.10.	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Day Ahead Schedules	Real-Time market bids and offers are collected at 11:00 AM the day ahead. A pre-dispatch schedule is produced by IMO at noon the day ahead and updated throughout day as offers and bids or expected system conditions change. Chapter 7, Section 5 of Market Rules The pre-dispatch schedule is in no way binding on participants, and they are free to change their bids and offers with no restrictions up to 4 hours prior to the dispatch hour. Chapter 7, Section 3.3 of Market Rules. The Day Ahead Market, once in- service, is designed to be a voluntary price hedging tool and will not have dispatch schedules associated with it.	Determined by Security constrained unit commitment including a yet to be finalized co- optimization of ancillary services MR&P 2.3.2	Transaction bids, Load bids and Generation bids may be submitted up to 05:00 the day before the operating day. The Security Constrained Unit Commitment program will run and post DAM prices and schedules at 11:00 AM. <u>Market Services Tariff 4.6 & 4.11</u>	Sellers may submit bids for hourly quantity and price, buyers may submit load levels and price before 12:00 PM on day prior to Operating Day. All participants shall submit schedules for bilateral transactions and elect their inclusion in the DA market. PJM posts total energy and hourly prices and informs participants by 16:00 hours. Implemented on 6/1/2000. Operating Agreement Schedule 1 10.1a, 2.6, 1.10.8	
		Rules				

Rank	Business Practice	IMO	ISO-NE	NYISO	РЈМ	Characteristics of
	Inventory Item	(Based on Anticipated Rules				preferred practice
		at Market Startup)				
	Emergency	Emergency Energy	Impact on market price is in	Inter ISO:	Participants authorize PJM to	
	Purchases – Rules	arrangements will only be used if	MR&P 5, Appendix 5-E.	ISO-NE/NYISO will sell at 110%	purchase or sell energy to meet	
	and impact on	load is in jeopardy. The MW		of LBMP @ Proxy Bus	emergencies and implement	
	market prices	quantity could result in a change	Rules for participant emergency	Sales w/other ISOs @ 150% of	agreements with other control	
	•	in Market Clearing Price(MCP) in	energy transactions are in MR&P	LBMP	areas.	
		Ontario, but the price of	3, 4, and 5.			
		emergency assistance will not		With Market Participants:	Operating Agreement Schedule	
		establish MCP.		Although the ability to submit	1 3.2.6, 4.3	
				"Emergency" contracts does not		
		Chapter 7, Section 7.7 and		exist per se, participants always		
		Chapter 5, Section 10.3 of		have available the option to		
		Market Rules		provide additional resources to		
				the NYISO by submitting bids into		
		Only the IMO can arrange		the Hour-Ahead Market for		
		emergency energy but it will be		selection by BIVIE. In addition,		
		as a last resort. When deficient		participants may other to provide		
		the INO will send system		NVISO for use in a Supplemental		
		advisories as well as solicit		Resource Evaluation		
		narticinants. The offers/hids				
		resulting from these advisories		NVISO/ISO-NE Emergency		
		and solicitation are not		Purchase Agreement filed with FERC		
		considered emergency		Turchase Agreement med with TERC		
		transactions. Should these		NVISO-PIM Inter Control Area		
		advisories or solicitations be		Agreement – May 1, 2000		
		insufficient the IMO will attempt to		<u>Alleenient Widy 1, 2000</u>		
		secure emergency energy		Accounting & Billing Manual Section		
		through our SC counterparts.		3.3.3		
		Market Duka Objecto 7, Op f				
		Iviarket Rules Chapter 7, Section				
		12				

Rank	Business Practice	IMO (Based on Anticipated Bules	ISO-NE	NYISO	PJM	Characteristics of
	inventory item	at Market Startup)				preferred practice
	Emergency	As described above only the IMO	Notification is made on the ISO	If the NYISO is short of resources	Following issuance of Maximum	
	Purchases - Market	can arrange for emergency	website and Participants are	and time permits, an attempt to	Emergency Generation, PJM	
	Notification &	energy and only when the IMO	provided with hourly energy	secure additional resources	may purchase available energy	
	Solicitation of	controlled grid is in an	amounts that the ISO expects to	through the Supplemental	from any PJM Member. PJM will	
	Assistance	emergency operating state.	need.	Resource Commitment (SRE)	attempt to provide 60 minutes	
		Participants will be notified when		process will be made. The	notice on the OASIS. PJM will	
	(See Link to MOU site	an emergency operating state is		NYISO will notify Market	post an emergency procedures	
	for a flow chart	declared and will be apprised of		Participants via email, of the	notice requesting purchase and	
	comparing each ISOs	the existing conditions.		requested resources, what hours	the start time expected. Bids may	
	Emergency Procedures)			they are needed, and the	then be submitted via a voice	
		Market Rules Chapter 5, Section		deadline for submission. After	line.	
		2.3 & 5.8		the designated deadline, the		
				INVISO WIII use the SRE	Emergency Operations Manual	
		Additionally, the INO may issue		application to select and commit	Section 2 page 2-14 through 2-	
		an under-generation advisory		the additional resources.	16	
		which includes provisions for the		Section 4.2 of the NVISO		
		offere/bide. Time permitting this		Section 4.2 of the NTISO		
		solicitation is intended to		Transmission & Dispatching		
		circumvent the need for the IMO		Operations Manual		
		procurement of emergency				
		energy (Market Rules Chapter 7				
		section 12.)				

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Market Closing Time (day ahead market) (See Link to MOU site for a chart comparing each ISOs times)	The Day Ahead Market is deferred from day one opening. Bids and offers submitted by 09:00 AM. [See Chapter 8 section 3.2 of Market Rules.] The Day-ahead or Energy Forward Market (EFM) when implement has no impact on the energy market. This EFM is a financial market used as a hedging	Proposed: Noon	Day-Ahead bids may be submitted or revised in the MIS up to 15 days in advance and until 05:00 the day before. <u>Market Services Tariff 4.6</u>	Noon PJM Operating Agreement Schedule 1 Section 1.10.1a	
	Market Closing Time (real time market)	Offers to sell and bids to buy can be changed without restriction up to 4 hours prior to dispatch hour. From 4 hours prior to 2 hours prior, there are restrictions on the changes to offers and bids. Within 2 hours of dispatch, offers and bids are not permitted to change, unless approved by IMO. Chapter 7, Section 3.3 of Market Rules	Proposed: Two hours ahead for Offers. Four hours for requests to commit or decommit	90 Minutes before the hour <u>Market Services Tariff 4.14</u>	New transactions, changes to existing transactions, changes to self scheduled unit output, taking over a unit all must be done with 30 minute notice (assuming use of EES for external transactions).	
	Market Posting Time (day ahead market)	The Day Ahead Market is deferred from day one opening. Market results will be published by 09:30 AM. Chapter 8, Section 3.6.1 of Market Rules	MR&P 2.4 – Initial unit commitment for the next day is published by 1700 hours.	11:00 AM Market Services Tariff 4.11	16:00 PJM Operating Agreement Schedule 1 Section 1.10.1a	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Market Posting Time (real time market)	Real-time market prices are posted on IMO web site within 5 minutes of each 5-minute dispatch period. Chapter 7, Section 6.5 of Market Rules Dispatch instructions are provided to Ontario participants every 5 minutes. Chapter 7, section 7.3.1 of Market Rules Pre-dispatch schedule reports forecast all prices and schedules, and are made available on an hourly basis from noon the day ahead right up to the dispatch hour. Chapter 7, Section 5 of Market Rules The hour ahead pre-dispatch schedule is used to establish the intertie energy schedule. The difference between the hour- ahead pre-dispatch External zone and Uniform Ontario energy prices are used to determine the cost of intertie congestion. This	Rules state as soon as practicable following the end of a Trading Interval. MR&P 3.13	30 Minutes before the hour <u>Transmission and Dispatching</u> <u>Operations Manual, Section 4.2.1</u>	Between 1600 and 1800 the day before the Operating Day, participants may submit bids for non-pool scheduled Day Ahead resources. Adjustments to the Day Ahead market will settle at real-time prices. Operating Agreement Schedule 1. Section 1.10.9	view by Coordination Team

Rank	Business Practice	IMO (Based on Anticipated Rules	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	,, ,	at Market Startup)				F
	Operating	10-minute synchronized reserve	Quantity of Operating reserve is	50 percent of the total 10-minute	Spinning reserve must be equal	
	Reserves - 10	is a real-time market - Ontario	first established based upon real	reserve	to the largest single contingency	
	minute	generation participants submit	time operating requirements.	requirements	the majority of the time.	
	synchronized	offers to sell and are informed of	Requirements are schedule Day		However, PJM does have	
		their obligations every 5 minutes.	Ahead subject to reduction if	Ancillary Services Manual, Section 6	operating procedures that allow	
			price of requirement exceeds		operating with less synchronized	
		Chapter 5, Section 4.5 and	costs established by demand		reserve provided adequate non-	
		Chapter 7, Section 7.4 of Market Rules	curve.		synchronized reserve exists.	
			MR&P 2.3.4		Operating Agreement 1.7 and 1.7.17	
	Operating	10-minute non sync reserve is a	Same principle as 10 minute	Covers the loss of the most	This is defined in the PJM	
	Reserves - 10	real-time market - Ontario	Synchronized.	severe Normal Transfer Criteria	manuals as Primary reserve.	
	minute non-	generator or participants external		Contingency	Current requirement is 1,700	
	synchronized	to Ontario or Ontario	MR&P 2.3.4		MW.	
	•	dispatchable loads can submit		Ancillary Services Manual, Section 6		
		offers to sell and are informed of			Operating Agreement 1.7 and	
		their obligations every 5 minutes			1.7.17.	
		(parties external to Ontario are				
		informed on an hourly basis).				
		Chapter 5, Section 4.5 and				
		Chapter 7, Section 7.4 of Market				
		Rules				

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	PJM	Characteristics of preferred practice
	Energy Pricing at the Boundaries	The IMO will calculate zonal marginal clearing prices for zones external to the province. One for each of New York, Michigan, Minnesota and Manitoba. There will be several zonal prices for Quebec due to the connectivity of interconnections with Hydro- Quebec. The hour ahead pre- dispatch schedule that is used to establish the inter-tie energy schedule will also determine the inter-tie congestion costs. The difference between the hour- ahead pre-dispatch External zone and Uniform Ontario energy prices are used to determine the cost of inter-tie congestion. This congestion cost is then applied to the real-time 5-minute energy price and the resultant price becomes the basis for external energy settlements.	At the present time, New England has a single ECP	Single Proxy Bus modeled for each control area boundary.	There are two price points in connection with PJM-NYISO model; NY-East and NY-West	 Maximize the use of the transmission system through economic signals. Market boundaries that do not double count congestion. Clear system model descriptions.
	Energy Pricing at the Boundaries Cont…	<u>Reference</u> : Chapter 7 section 5.5.3 and chapter 9 section 3.1.3 of Market Rules.	Reference: ECP is defined in MR&P 5	Reference: OATT Attachment J – LBMP Prices for External Locations	Reference: Regional Transmission and Energy Scheduling Practices	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Area Regulation	Regulation is contracted for by the IMO. Chapter 7, Section 9.2.2 of Market Rules	Obligation created Day Ahead. MR&P 2.3.3 Price established in Real Time. MR&P 3.10.6 Quantity determined by NEPOOL Operating Procedure No. 8.	Regulation requirements are established through analysis of NY Control Area daily load patterns and tests performed under actual operating conditions. Tables are prepared by the NYISO which show the Regulation requirements for the NY Control Area for Summer and Winter capability periods over various hours of the day. The NYISO will determine the amount of regulation required for different time periods and load conditions based upon empirical experience and engineering judgement. <u>Transmission and Dispatching Manual, Section 2.1.4</u>	1.1% of Valley (off-pk) and Peak (on-pk) Transmission Tariff Schedule 3, Section 3.3, 1.11.4, and 3.2.2	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Who carries reserves on transactions Intra- ISO	Within Ontario there are no transactions; just dispatch instructions. Operating Reserve is provided through the real time operating reserve market. Chapter 5, Section 4.5 and Chapter 7 of Market Rules	Transfer of Intra-ISO reserves is dependent upon terms of "Obligation Transfer Contract" MR&P 4.2.3	NYISO for each LSE, who then pays a monthly operating reserves charge <u>Ancillary Services Manual, Section</u> <u>6.4.4, Operating Reserve Charge</u>	Reserves are required to be carried by Load Serving Entities (LSEs) regardless of generation source. Operating Agreement Schedule 1; Section 3.2.3 (d) Day-Ahead market Section 3.2.3 (h) Real- time market.	
	Who carries reserves on transactions Inter- ISO	All inter-ISO dispatch instructions (I.e hourly schedules) are considered capacity backed. Chapter 5, Section 4.5 and Chapter 7 of Market Rules	For energy 1 type transactions, the transaction is considered recallable on 10-minutes notice and is counted in 10-minute reserve of ISO-NE. Energy 2 transactions are capacity backed and not recallable on 10-minutes notice.	NYISO for each Transmission Customer engaging in an Export <u>Ancillary Services Manual, Section</u> <u>6.4.4, Operating Reserve Charge</u>	Reserves are required to be carried by Load Serving Entities (LSEs) regardless of generation source. Operating Agreement Schedule 1; Section 3.2.3 (d) Day-Ahead market Section 3.2.3 (h) Real- time market.	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Forward Market - Day ahead	Day-Ahead forward market is deferred from market opening. Chapter 8, Section 3 of Market Rules.	Security constrained price based	Transaction bids, Load bids and Generation bids may be submitted for evaluation day- ahead by the Security Constrained Unit Commitment Program. The Day-Ahead market issues forward contracts which provide a hedging mechanism for energy purchases in real-time.	Sellers may submit bids and buyers may submit load levels and price. Incremental and decremental bids are also accepted in the Day-Ahead market. All participants submit schedules for bilateral transactions and elect their inclusion in the DA market. Operating Agreement Schedule 1; Section 1.10.1(a)	
	Forward Market - Hour ahead	There is no hour-ahead forward market in the Ontario Market design.		A Hour-Ahead Evaluation, which is referred to as the HAM is performed each hour, however there is not an Hour-Ahead settlement.	There is no Hour ahead market.	
	User Interface - Oasis	Not employed in Ontario markets.		OASIS Web Pages Market Services Tariff, Section 2.127 & 4.3	PJM is Transmission Provider for the PJM system and maintains the OASIS. PJM Open Access Transmission Tariff 4	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	User Interface - Data Upload	See User Interface - Oasis		OASIS Upload Template <u>MIS Instructions - Upload/Download</u> <u>Template</u>		
	User Interface- Data Download	See User Interface - Oasis		OASIS Download Template MIS Instructions - Upload/Download Template		
	Transmission Rate Information Transparency	Transmission costs are recovered through Ontario Energy Board (OEB) -approved rates applied to Ontario load. There is a fee charged to successful inter-ISO bids to buy of \$1/MWh - reference OEB Approval of Hydro One transmission rate application.	NEPOOL Open Access Transmission Tariff	TSC Rates are Posted on OASIS Customer's may estimate a Transactions TSC charges using the Online TSC Calculator located on the NYISO Website under the Market Data Toolbox <u>Open Access Transmission Tariff,</u> <u>Attachment H</u>	Transmission rates are posted on OASIS and the PJM website under Documents, OATT, Attachment H and Schedules.	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Data/Information Availability			NYISO Website Public Data available via the NYISO Website at <u>www.nyiso.com</u> Confidential Data under the secure area of the OASIS requiring appropriate user login privileges.	Specified by the Data plan WG of the Energy Market Committee Public data on <u>www.pjm.com</u>	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Bidding (cost-	Offers to sell and bids to buy are	Market based	Market Based - A price cap of +/-	All participants may submit	
	Bidding (cost- based vs. market- based)	Offers to sell and bids to buy are totally market based. IMO has no access to participant cost structure for bidding purposes. The Ontario market will have a set of market clearing price boundaries (+/- Maximum Market Clearing Price (MMCP) and Maximum Operating Reserve Price (MORP)) for energy and operating. These boundaries however have yet to be defined. Market Rule Chapter 7, Section 4.4.6	Market based MR&P 2.2 and 3.4. Reserve markets are capped at the ECP during times of OP-4 Conditions, until Dec. 31, 2000. Expect to request continuation until March 31, 2001.	Market Based - A price cap of +/- \$1000.00 is in place for the following types of bids; Incremental Energy, Minimum Generation, Decremental, Price Sensitive, and Sink Price Cap. 10-minute reserve suppliers in eastern New York are required to offer all their available 10 minute non-spinning reserve capacity into the market at rates subject to a cost-based limit not to exceed \$2.52 per megawatt. <u>Technical Bulletin #56 - Bid Caps in</u> the Market Information System (MIS)	All participants may submit market-based bids. Operating Agreement 1.2, 6.4.	

Rank	Business Practice	IMO	ISO-NE	NYISO	РЈМ	Characteristics of
	Inventory Item	(Based on Anticipated Rules				preferred practice
		at Market Startup)				
	Limitations on	Offers to sell and bids to buy can	All capacity must be bid into the	All Installed Capacity (ICAP) units		
	Submission of	be changed without restriction up	market. Generators on outage	must bid into the DAM market.		
	Generator & Load	to 4 hours prior to dispatch hour.	bid an HOL of 0. Presently load	Generators with an accepted		
	Bids	From 4 hours prior to 2 hours	does not bid into the market.	DAM bid cannot raise their bid		
		prior, there are restrictions on the	Under CIVIS/IVISS load would be	curve in the HAM, they can only		
		Mithin 2 hours of dispatch, offers	allowed to bid in day ahead.	lower II.		
		and hids are not permitted to		Load Serving Entities (LSEs)		
		change unless approved by IMO		can purchase some or all of their		
		change, amose approved by me.		forecasted load in the DAM		
		Chapter 7, Section 3.3 of Market		market. Once selected, the		
		Rules		market participant is lock-in.		
				Excess load purchased in the		
				day-ahead is sold back in the		
				real-time market at the real-time		
				price. Deficiencies would be		
				purchased in the real-time		
				market.		
				Section 5.12 of the NVISO Services		
				Tariff		
	Dvnamic	Dynamic scheduling will not be a	No	NA	There are presently no	
	Scheduling	part of day one market.			dynamically scheduled loads in	
	g				PJM.	
					Operating Agreement 1.12,	
					Schedule 1	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Demand bidding	at Market Startup) Voluntary bids to buy are an integral aspect of the Ontario market design. However, price- taking loads (e.g. local distributing company obligations) do not bid to buy; the IMO forecasts their load requirements. Chapter 11 definitions of dispatchable and non- dispatchable loads Chapter 5, Section 7.2.1 of Market Rules.	Yes Day Ahead MR&P 2.2 Real Time MR&P 3.4.2	A Load Serving Entity (LSE) may submit a fixed bid for energy in the Day-Ahead market, which means that the load will purchase a "fixed" amount of MW at the DAM LBMP regardless of the price. Additionally, an LSE may submit a price capped load bid which specifies a load block amount and a price (in \$/MWh). If the DAM LBMP is below the bid price cap, the LSE will purchase the load block amount in addition to its fixed bid amount. If the DAM Energy LBMP is above the bid price cap, the additional load block will not be purchased; only the fixed bid amount will be purchased. An LSE may submit bids for up to three Price Capped Load blocks.	Day Ahead Market permits demand bidding Operating Agreement , Schedule 1. 1.10a (a)	
				Technical Bulletin #7 - Price Capped Loads and their Day Ahead Scheduling		

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Allowance of Virtual Bidding (Load & Generation)	The IMO administered markets are a real-time energy market which is used to satisfy non- dispatchable (forecast) and dispatchable (bid) loads and no virtual loads (or generators) are permitted. At market commencement there will be no day-ahead market but once implemented the IMO Energy Forward Market does permit the offering and bidding of virtual generation and load.	Presently virtual bids are not allowed. Under CMS/MSS virtual load bids would be allowed, but virtual bids of generation would not.	Virtual Load and Generation Bidding is not currently allowed under the NYISO rules, however proposals for virtual load bidding are currently under consideration and are being discussed through the NYISO Business Issues Committee. Currently, LSEs have the capability to purchase load day- ahead, including options for additional load at a price cap. Day-ahead load bids will lock-in the amount specified by the LSE at the DAM LBMP price. There is no direct penalty for over- forecasting and purchasing excess load in the day-ahead. Excess load purchased in the day-ahead is sold back at the real-time price. <u>Virtual Load Bidding [Working]</u> <u>Group</u>	All Market Participants may submit Increment Bids and/or Decrement Bids that apply to the Day-ahead Energy Market only. Such bids must specify amount, location and price at which the Market Participant desires to purchase or sell energy. Operating Agreement Schedule 1. Section 1.10.1a (i)	

Rank	Business Practice Inventory Item	IMO (Based on Anticipated Rules at Market Startup)	ISO-NE	NYISO	РЈМ	Characteristics of preferred practice
	Self Scheduling	Small generators (up to 5 MW) may self-schedule. Intermittent generators may submit forecasts of expected energy to be provided. Each must be located within the IMO-control area and self-scheduling is not permitted	Yes MR&P appendix 2 section 2.b	Transmission Customers, including LSEs, may provide for Self-Supply of Regulation and Operating Reserve by placing generation facilities supplying any one of the Operating Reserves under ISO Operational	LSEs may self schedule resources. Operating Agreement Schedule 1 1.10.3	
		across the control area boundaries Chapter 7, Sections 2.2 and 3.4.1 and the definitions of Chapter 11 of Market Rules		Control. The generation facilities must meet ISO rules for acceptability. The amount that any such customer will be charged for Operating Reserve Services will be reduced by the market value of the services provided by the specified generation facilities as determined in the ISO Services Tariff.		
				Open Access Transmission Tariff, Regulation, Sched 3, Section 1.0 Operating Reserves, Sched 5, Section 3.0		