



# 60-mn reserves proposal

Comments of H.Q. Energy Services (U.S.) Inc.

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# Summary



## **HQUS commends the NYISO's efforts to design a new reserve product to account for forecast uncertainty as part of the Balancing Intermittency project**

- HQUS generally supports the proposed 60-mn reserve product
- However, HQUS believes that external market participants should be allowed to offer the product
  - Doing so would significantly expand the pool of resources available to back up intermittent resources (especially, but not only, upstate renewables)

# Comments



## **Imports from control areas where 15-mn intra-hour transaction capability is enabled can technically deliver the requested reserves in the current market design**

- 15-mn scheduling is currently enabled at the HQ and PJM interfaces
- With intra-hour 15-mn scheduling, an energy request can be scheduled and delivered within 45 mn, regardless of the moment within the operating hour the 60-mn notification is sent to the supplier
  - Ex.: notification sent at 9:30AM
  - An import can be scheduled in RTC45 and all subsequent RTC runs, so that the energy can be delivered by 10:15 or 10:30AM at the latest

# Proposal of HQUS



## **External suppliers should be allowed to offer 60-mn reserves, with the following eligibility requirement:**

- 15-mn intra-hour scheduling must be enabled with the source control area
- There should be an ICAP-like commitment from the source control area to remove the 60-mn reserve quantity from its own reserves for the entire 4-hour duration (i.e., non-recallable)
- Possibly require firm transmission service in the source control area up to the NYCA border for the entire 4-hour duration.

# Advantages



- Intra-hourly imports are very flexible: can be scheduled down whenever RTC finds the energy is not needed anymore...
  - ... and back up again if needed
  - As a reminder, ramp rates at an external interface are **very large**:
    - Top-of-the-hour: up to 70 MW/mn
    - 15-mn intra-hour: up to 20 MW/mn
- Increased reliability due to the non-recallability of the energy
  - Imports are generally recallable if not ICAP-backed
- Communications protocols are already in place with HQ and PJM

# Thank you!

