



**Stakeholder Comments on MPWG Issue 039: Inter-Market Trading of Operating Reserve**

From: BELL Brian -EM SUPPORT  
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OPG offers the following comments to the IESO on the Market Pricing Working Group Exporting Operating Reserve Initiative.

- 1) The IESO should continue to pursue export of operating reserve as it is consistent with the existing objective of maximizing gain from trade.
- 2) IESO should determine whether the new MISO Ancillary Service market which will allow OR to be supplied to Ontario, would also accept OR from Ontario. If the MISO market won't or can't accept OR, then the IESO should reconsider whether it is fair to accept the import of OR from MISO as this may be nonreciprocal access. In general the principle of reciprocal handling of OR should apply to all intertie zones.
- 3) Although the export of OR is of interest to OPG, we suggest that it less important than the current issue of scheduling recallable exports in final predispach to NYISO.

Regards,

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