

Market Renewal Program Feedback Form

Market Renewal Implementation – Draft Market System and Operations Market Rules and Market Manuals – July 14, 2023

Feedback Provided by:

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Date: September 29, 2023

To promote transparency, feedback submitted will be posted on the Implementation Engagement webpage unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the Market and System Operations batch of Market Rules and Market Manuals amendments. The draft documents can be accessed from the [Implementation Phase documents webpage](#). Additionally, materials for the July 27 and 28 webinars where the IESO will provide an overview of the batch will be posted to the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by November 8, 2023. If you wish to provide confidential feedback, please mark the document "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Market Rules – Chapter 5, Sections 4, 6, 7, 8 and 10

What feedback do you have on the Chapter 5, Sections 4, 6, 7, 8 and 10 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

Market Rules – Chapter 7, All Sections

What feedback do you have on the Chapter 7, All Sections draft market rule amendments?

Section / Topic	Feedback
Offer Restrictions	<p>There are many restrictions on offer changes such as (i) offers shall not be increased after 20:00 the day prior for the dispatch day; (ii) offers shall not be increased above value accepted by IESO to establish ERUC commitment/Advisory schedule commitment; and (iii) offer greater than the lesser of 15% or 10MW of the ADE. Can the IESO confirm if its system and operations tools will incorporate such offer restrictions and thus automatically prevent the Market Participants from making any offer changes that violate these market rules without the appropriate reason code?</p> <p>Atura is concerned with the offer restrictions outlined in MR Chapter 7 section 3.3.3.5 and 3.3.3.7 where a GOG-eligible resource does not receive a day-ahead operational commitment. The Market Participant with no day-ahead operational commitment may not secure fuel, via third party purchases or storage withdrawals, and pipeline transportation accordingly. Variable fuel costs and delivery costs may change substantially during the dispatch day that prevents the Market Participant from recovering its true costs as a result of the section 3.3.3.5 and 3.3.3.7 restrictions.</p> <p>Section 22.5.5 identifies the process required to “request a temporary revision to the fuel cost component of a reference level for specific dispatch hours if the fuel cost component in a resource’s energy offer reference level, start-up offer reference level, or speed no-load offer reference level will not reflect the resource’s short-run marginal costs for fuel”. In section 22.5.7.2 the request is to be made no later than 150 minutes before the first dispatch hour in the request for RT. Can the IESO confirm that once this request has been made and approved by the IESO, does this allow for offer revisions after the 20:00 submission window restrictions outlined in MR7 section 3.3.3.5 and 3.3.3.7?</p>

Section / Topic	Feedback
OR Offer Cancellations	<p>Market Rules Chapter 7 section 3.6.7 states "A registered market participant for a dispatchable generation resource or a dispatchable electricity storage resource shall withdraw an offer to provide operating reserve as soon as practicable, if, for any dispatch hour in the current pre-dispatch schedule, the resource cannot provide operating reserve because the resource's predispatch schedule for energy is less than its reserve loading point." With the added intelligence being incorporated into the PD/ERUC process, including lead times, can the IESO confirm if Market Participants are required to update its offers for the hours leading up to the hour where the unit can reach MLP (i.e., today this may include hourly cancelling operating reserve offers for the hours prior to the earliest the unit can reach MLP and cancelling energy offers for the hours the unit is unable to sync)?</p>
Start-Up Offers	<p>For the three-part DA offers the Start-Up Offers can be escalated for the hours at the end of the day to compensate for any MGBRT that would continue into the day following the DA schedule. With PD/ERUC, these escalating Start-Up Offers would still be required for a PD/ERUC commitment prior to 20:00 but not required for a PD/ERUC commitment following the 20:00 PD run since it optimizes across both days. Can the IESO confirm if Atura's understanding is correct?</p>
Ramp	<p>MR Chapter 7 section 3.5.33.3 identifies energy per ramp hour as the method of submitting the hourly energy during ramp hours. But in MR Chapter 7 Appendix 7.5 section 4.2.3.7 uses ramp up energy to minimum loading point to define the parameter RampE that is hourly energy during ramp hours.</p> <p>a) Why are there two terms that appear to define the same submitted data? b) Is RampE a constraint in both Day-ahead and Pre-dispatch. Will the Day-ahead and Predispatch calculation engines use RampE for each ramp hour or will the calculation engine use the submitted ramp rates?</p>

Market Rules – Chapter 7, Appendix 7.1 – 7.4, 7.7

What feedback do you have on the Chapter 7, Appendix 7.1 – 7.4, 7.7 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

Market Rules – Chapter 7, Appendix 7.8

What feedback do you have on the Chapter 7, Appendix 7.8 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

Market Rules – Chapter 11

What feedback do you have on the Chapter 11 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

Market Manual 4.1

What feedback do you have on draft Market Manual 4.1?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

Market Manual 4.2

What feedback do you have on draft Market Manual 4.2?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

Market Manual 4.3

What feedback do you have on draft Market Manual 4.3?

Section / Topic	Feedback
Thermal State	<p>If two PSUs (which share common STG) are determined to be in cold state based on the last hour the CTs were at MLP and the corresponding MGBDT values, and only one PSU is operating in real time, the IESO has stated in MM 4.3 section 2.5.1.4 that the MP is to revise the MGBDT to reflect that the 2nd non-operating PSU is now in a hot state. It is Atura's understanding for the MGBDT Daily Dispatch Data, the values are updated on a per operating state (hot/warm/cold) basis and since Operating State Daily Dispatch Data is used for DA only, can the IESO confirm that the Market Participant will be required to change all three operating state MGBDT values to the hot state in RT?</p>

Market Manual 4.5

What feedback do you have on draft Market Manual 4.5?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

Market Manual 7.1

What feedback do you have on draft Market Manual 7.1?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

Market Manual 7.2

What feedback do you have on draft Market Manual 7.2?

Section / Topic	Feedback
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Market Manual 7.3

What feedback do you have on draft Market Manual 7.3?

Section / Topic	Feedback
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Market Manual 7.4

What feedback do you have on draft Market Manual 7.4?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

General Comments/Feedback

Atura provides its preliminary comments/questions on the IESO proposed market system and operations market rule and market manual amendments issued July 14, 2023. The comments/questions are not intended to be exhaustive and remains subject to further review by Atura and may have additional comments/questions as Atura participates in the IESO MRP Q&A stakeholdering sessions.