

Market Renewal Program Feedback Form

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

Feedback Provided by:

Name: Kristine Liao

Title: Operational Effectiveness Supervisor

Organization: Ontario Power Generation

Email:

Date: November 10, 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
Section 8.4.1	<p>Please clarify the logic operators for Sections 8.4.1.1 to 8.4.1.5.</p> <p>The current logic appears to be: 8.4.1.1 OR 8.4.1.2 OR 8.4.1.3 OR 8.4.1.4 AND 8.4.1.5.</p> <p>Should the logic operator be OR for all these conditions, i.e. there are five conditions in which a market participant (MP) is eligible for compensation?</p>

Market Rules – Chapter 7, All Sections

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

Section / Topic	Feedback
Section 3.1.8	<p>“Dispatch data submitted during the dispatch day to which it applies shall only be submitted for the remaining dispatch hours of that dispatch day”.</p> <p>OPG interprets that the “remaining” hours means starting with current hour+1, please confirm. Otherwise, please elaborate and provide the correct interpretation.</p>
Section 3.1.14	<p>The current Market Manual 9.4 (IESO_MAN_0079, Issue 8.0) Section 4.5.5.1 outlines the provision to allow MPs to increase the Availability Declaration Envelop (ADE) due to early return from planned and forced outages, forced derates, or cancellation of outages.</p> <p>Section 3.1.14 as written only allows ADE increase due to early return for planned outages, and removed the other provisions as allowed in the current market rules (i.e. early return from force outage, force derates and cancellation of outages). The section removes an inordinate degree of flexibility from MPs in regard to revision of ADE and unnecessarily penalize MPs for conditions that are out of their control, i.e. outage cancellation due to weather and road conditions. What is the rationale for the removal of the additional provisions?</p> <p>OPG strongly recommends the IESO to revert to previous wording that include the existing provisions for ADE increase.</p>
Section 3.1.14.5	<p>Please specify the market manual reference for ADE materiality threshold.</p>

Section / Topic	Feedback
Section 3.2.3	Please specify the market manual reference provided within this section.
Section 3.2.5	This section states that approval may be granted for software, hardware, or communications system outages. Please clarify if this approval applies to the IESO's ability to receive information or does it apply to an MP's ability to submit information, or if it applies to both.
Section 3.3.1	This section states that day-ahead dispatch data will be "converted" per Section 3.1.10. However, Section 3.1.10 does not use the term "conversion". What is meant by "conversion" in this context?
Sections 3.3.3.4, 3.3.3.5 and 3.3.3.6	<ol style="list-style-type: none"> 1. Please confirm that the "latest offer submitted" refers to the last offer received by the IESO prior to the start of the calculation engine run. 2. Would MPs be able to update/revise offers before the start of the next calculation run? For example, if an MP submits an incorrect offer for the next day at 17:30 due to system error, would the MP be able to replace the incorrect offer by resubmitting a replacement offer at 18:25 prior to the start of the first PD calculation run for next day, which initiates at 20:00? 3. OPG requests a similar assessment of the above question for Sections 3.3.3.5 and 3.3.3.6, i.e. would the MP be able to revise offers prior to the start of the next calculation engine run?
Sections 3.3.3.4 and 3.3.3.6	With regards to "latest offer submitted", please clarify if the offer submitted at 17:30 is allowed to be higher than the offer submitted at 18:30, even though the PD engine has not started yet?
Sections 3.3.3.8 and 3.3.3.10	The conditional statements that open Sections 3.3.3.8 and 3.3.3.10 are identical and the subjected Sections 3.3.3.9 and 3.3.3.11 are almost identical. Please clarify the different in intent between these two sets of sections.
Section 3.3.4	<i>"Generation resource"</i> is italicized, but it does not appear as a defined term in Market Rules Chapter 11.

Section / Topic	Feedback
Section 3.5.14	<ol style="list-style-type: none"> <li data-bbox="553 170 1463 279">1. Please clarify instances where Section 3.5.14 can be triggered and how the MP would be eligible to submit a minimum hourly output offer. <li data-bbox="553 327 1495 401">2. What is meant by spill restriction in Section 3.5.14.1 in triggering the use of the minimum hourly output parameter? <li data-bbox="553 449 1487 558">3. How would the MP use the Minimum Hourly Output parameter to prevent the triggering of a spill restriction, if spill restriction refers to preventing the triggering of a sluice gate to initiate spill.
Sections 3.5.15.1 and 3.5.17.1	<p data-bbox="505 604 1495 711">MW should not be pluralized, as MWs indicates megawatt-second. There are other instances in the Market Rules and Market Manuals that should be revised from "MWs" to "MW".</p>

Section 3.5.23

This section, along with Market Manual 4.1 Section 2.1.8, outlines the submission value requirement for linked forebay, time lag and MWh Ratio parameters. However, there is no submission timing requirement for using this set of parameters.

1. Please clarify if the linked forebay parameters can be used in both the Day-Ahead Market (DAM) and Pre-Dispatch (PD) timeframes.
2. Please provide the detail on what conditions and when MPs can submit linked forebays in the DAM timeframe.

OPG feedback from July 24, 2020 (feedbacks #9 and #10) and the follow-up feedback on December 18, 2020 (feedback #1 – IESO Responses ID 493) both express concern regarding the IESO’s verbiage during the Market Renewal Energy Detailed Design Engagement around the use of the new hydroelectric parameters (e.g. linked forebays), which is restrictive to limiting the use of linked forebays to very rare situations where SEAL was imminent in the DA timeframe allowing for the use of the new parameters. This verbiage has continued through to the current iteration of Section 3.5.23: *“...if the submission of the above daily dispatch data parameters is necessary to prevent the resource from operating in a manner that would endanger the safety of any person, damage equipment, or violate any applicable law.”*

OPG would reiterate that, with the as-written Section 3.5.23, it remains unclear to MPs whether the hydroelectric parameters may be used in DA and PD for the purpose of producing feasible DAM and PD schedules, which if dispatched in the Real-Time (RT) could reasonably be expected to prevent the resource from operating in a manner that would endanger the safety of any person, damage equipment, or violate any applicable law (SEAL). It is unclear if SEAL conditions would ever apply in the DA timeframe since DAM schedules are financial commitments, not physical obligations.

OPG strongly recommends the language in Section 3.5.23 to be revised to reflect the above concern. In particular, the language should be revised to incorporate the option of triggering linked forebay submissions based on physical and/or operational constraints in DA timeframe that could result in SEAL concerns, but those SEAL concerns would not materialize until closer to RT.

OPG proposes the following revision to the above italicized passage: “...if the submission of the above daily dispatch data parameters **could reasonably be expected** to prevent the resource from operating in a manner that would endanger the safety of any person, damage equipment, or violate any applicable law.”

Section / Topic	Feedback
Section 3.6.5	What is the minimum value for reserve loading point?
Section 3.6.7	<p>This section indicates that MPs would have to cancel operating reserve (OR) offers in the pre-dispatch timeframe if the resource’s pre-dispatch energy schedule is less than its reserve loading point.</p> <p>How would the calculation engines solve for OR shortfall in RT if resources must cancel OR due to the energy dispatch falling under the reserve loading point? This also creates logistical confusion if MPs must cancel/un-cancel based on changes (energy schedule going above or falls below reserve loading point) to pre-dispatch schedule in future hours.</p> <p>OPG request the IESO to incorporate the resource’s reserve loading point within the calculation engine process to avoid the risk for OR shortfall as well as administrative burden outlined above.</p>
Sections 4.3.1 and 4.3.2	How would the IESO communicate a DAM failure to MPs?
Section 4.3.3	Please outline the process on how the next day’s market will be run in the Real-Time in the instance of DAM failure.
Section 5.1	The current Market Rules Chapter 7 (MDP_RUL_0002_07, Issue 51) includes a deadline for running the initial PD schedule for the following day. This is absent from the Market System and Operations Batch Chapter 7. What is the rationale for this removal?
Section 5.7.3	<ol style="list-style-type: none"> 1. Would the published report be a global system report or a private MP report? 2. Please quantify “significant difference”.
Sections 10.1.6, 10.1.7 and 10.1.8	These three sections provide IESO with flexibility (through the use of “shall use reasonable efforts”) for not sending timely start-up notices. There should be similar flexibility provided for MPs for any failure to meet the requirements of such notices if the failure was due to late issuance by the IESO.
Sections 10.2.5, 10.2.6 and 10.2.7	Similar to the above comment, these sections provide IESO with flexibility (such as through the use of “shall use reasonable efforts”) for delays in issuing notices of decommitment. There should be similar flexibility provided for MPs for any failure to meet the requirements of such notices if the delay was due to delays on the IESO’s part.
Section 10.3.2	Please specify the market manual reference that outlines the procedure on how an MP can withdraw from DA or RT commitments due to SEAL reasons.

Section / Topic	Feedback
Section 10.3.3	Please specify the market manual reference that outlines the procedure on how an MP can withdraw from DA or RT commitment due to non-SEAL reasons.
Section 10.3.4	OPG proposes to include a similar statement for submitting offers in the current day if the commitment starts in HE1 of the next day and ramp up hours are needed prior to that time in the previous day.
Section 11.2.1	Please provide provisions to also allow for synchronization in instances where an MP's resource is required to sync in the absence of an energy schedule.
Sections 11.2.2A and 11.3.2	To remove any potential confusion, these sections should include a statement that states the conditions are applicable to non-quick start units that are not generator offer guarantee (GOG) eligible. A GOG-eligible resource is also a non-quick start (NQS) resource, but a non-quick start resource may not be a GOG-eligible resource.
Section 11.3.2	<p>This section outlines the requirement for MPs to provide one hour notice to the IESO prior to desyncing a NQS resource from the grid.</p> <p>However, Section 10.2.1 indicates that the IESO shall issue a notice of decommitment to NQS resources no later than 30 minutes before the decommitment hour. Section 10.2.1 is aligned with the graph presented on slide 65 from the <i>Market Renewal Program Implementation Market Rules and Market Manuals: Market and System Operations Q&A Session for GOG-Eligible Non-Quick Start Resources</i> presentation from October 3, 2023.</p> <p>Taking into account both points above, Sections 11.3.2 and 10.2.1 are in conflict with each other, as the MP would not be able to provide a one-hour notice to the IESO prior to desync if the MP is only notified 30 minutes prior to de-commitment time.</p>
Section 22.9.1.3	Virtual trader should be italicized as it is a defined term.
Section 22.10	OPG recommends the inclusion of a short introduction sentence stating that this section sets out criteria for determining constrained areas for the purpose of performing conduct and impact tests described in Sections etc. etc.
Section 22.11.1.2	"Market participant behaviour" is in a different font compared to the main text.
Section 22.13.1	When indicating "100%" above the reference level for the set of ex-ante validation parameters, please confirm that the resultant threshold is double the reference level value.

Section / Topic	Feedback
Sections 22.13.1.3.2 and 22.13.1.4.2	<p>From the June 21, 2022 stakeholder engagement presentation, the Minimum Generation Block Down-Time (MGBDT) transition time for the WARM and COLD thermal states was increased from 24 hours to 99 hours.</p> <p>Sections 22.13.1.3.2 and 22.13.1.4.2 provides the validation for the more restrictive threshold for the WARM and COLD thermal states, i.e. minus three hours below the reference level value.</p> <p>In practice, the difference between MGBDTs for the WARM and COLD thermal states are significant and will always be outside the three-hour threshold. Thus, MPs will not be able to meet this testing threshold. Please re-evaluate the three-hour threshold considering the increase of the transition time to 99 hours for the WARM and COLD thermal states.</p>
Pre-Dispatch Mitigation	<p>OPG understands that IESO will not revisit the mitigation results during PD once the resource is mitigated for any given dispatch hour. Taking that into account, would the IESO update the reference level values for that dispatch hour if a higher reference level is requested and approved?</p> <p>For example, a hydroelectric resource has a baseline energy financial reference level of \$60 and an alternate energy financial reference level of \$80. During the 07:00 Pre-Dispatch run, the offer for HE20 is mitigated to \$60. However, at 15:30, the MP requests the alternative reference level for HE20 and is approved. Would the mitigated price for the resource for HE20 be updated to approved alternate reference level of \$80?</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
Appendix 7.7, Section 1.3.3	Please provide a definition of critical equipment.

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
General	<p>OPG has read and reviewed Appendix 7.8. The market rules description of Economic Operating Point (EOP) is very complex. It is difficult for MPs to self-educate for full comprehension based on the rules presented. The EOP calculation process is complicated to the level that it is impossible for MPs replicate and validate. As a result, MPs can only accept EOP settlement calculations as presented by the IESO. This is a high financial risk to MPs.</p> <p>The EOPs are part of the Financial Settlement amount calculation provided by the IESO. With the inability of MPs to perform shadow calculations for verification, it is imperative that the IESO ensure the correct and complete calculation of the EOP.</p> <p>As presented in the Appendix 7.8, the calculation of the three EOP categories (DAM_LC_EOP, RT_LC_EOP and RT_LO_EOP) requires large data set with various constraints. OPG requests the IESO to clarify if all EOP calculation data, such as Market-Participant/IESO Data Parameters and Constraint Violation Variables/Results, will be published as supporting data for EOP results.</p> <p>As MPs have limitation in simulating the EOP calculation, it would be very helpful if the IESO could help MPs to simulate the EOP results during the Market Trial and Sandbox testing phases. The IESO should include the calculation of Energy and Operating Reserve EOPs for different resource types, such as hydro, non-quick starts and dispatchable nuclear, with the inclusion of resource types to be based on MP registration data and testing offers.</p> <p>It is also important to have sufficient simulated scenarios during the Market Trial and Sandbox testing phases to ensure the EOPs can be calculated correctly and completely, and is reflective of real market operations.</p>

Market Rules – Chapter 11

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

Section / Topic	Feedback
bid	Suggest revising this definition to include bids from Demand Response participant in Capacity Auction.
day-ahead market expiration	Suggest including the failure declaration timeline of 15:30 EPT in the definition in addition to referencing Market Rules Chapter 7 Section 4.3.2.

Section / Topic	Feedback
speed no-load offer	Please provide the rationale behind the change in the definition, which was changed from "injecting no energy" to "with zero net energy".

Market Manual 4.1

What feedback do you have on draft Market Manual 4.1?

Section / Topic	Feedback
Section 2.1.1.1	<p>"Non-quick start resource excluding nuclear – The IESO tool does not automatically validate for compliance with MR Ch.7 s.3.5.5.7."</p> <p>Please clarify if the above passage mean that there is no automatic validation of the second P,Q pair for offers submitted for NQS resources.</p>
Section 2.1.4	Please provide reference to the "compliance aggregation interpretation bulletin".
Section 2.1.13.1	<p>For requests to establish a Minimum Loading Point (MLP), an outage slip must be submitted to indicate the period that the MP expects to operate above MLP. The new requirement is that the outage slip must be accompanied by revised offers to economically schedule the resources to the desired loading point.</p> <p>OPG strongly recommends the inclusion of the requirement for the IESO to accept offers in the mandatory window to reflect the change to MLP, otherwise, the offers would not reflect the actual conditions of the resources.</p> <p>For example, if the MLP increase starts at 02:00 and is expected to end at 14:00 and offers have been changed up to and including 14:00 to reflect this, there should be allowance for mandatory window offer changes if the restrictions end early, such as at 11:30.</p> <p>Additionally, should MPs change the reserve loading point of the resource to be aligned with the outage slip and offers?</p>
Section 2.1.18	Please clarify if the average quantity of energy in MWh in this section will be used as a limit to dispatch.

Section / Topic	Feedback
2.1.18.2	<p>The Ramp Hours to Minimum Loading Point (MLP) must be a whole number. What is the treatment for resources that have non-whole numbers for ramp hours?</p> <p>For example, Resource A has a Ramp Hours to MLP of 3.5 hours. If the unit must be at MLP at 12:00, it will need to synch to the grid at 08:30. However, if the Ramp Hours to MLP must be a whole number, and 3.5 hours round up to 4 hours, can Resource A still synch at 08:30, or would it have to synch at 08:00 based on the submitted dispatch data of 4 hours?</p> <p>What is the treatment for the rounding of ramp hours, for example, if the ramp hours to MLP is 3.4 hours, what would the MP submit? If the ramp hours to MLP is 3.5 hours, what would the MP submit?</p>
Section 2.4.1	<p>“The dispatchable load is required to disregard the 0 MW dispatch instruction...”</p> <p>Is “disregard” in the above sentence equivalent to not acknowledging the dispatch from the MP’s end? Please provide the meaning of “disregard” in this sentence.</p>
Section 3.1.1	<p>Please elaborate on what are “price restrictions” conditions.</p>
Section 3.1.2	<p>This section states only one class of OR being selected but does not indicate if the OR would cascade downwards as in the current market. Please confirm if OR cascading is still in effect after Market Renewal. For example, if only 10S was offered but was not scheduled, will this quantity cascade down to 10N for possible selection and so on?</p>
Section 4	<p>Recommend the fifth bullet point not be included in the list but be formatted as a stand-alone paragraph.</p>
Section 4.1.1	<ol style="list-style-type: none"> 1. Are there submission restrictions at other boundary entities aside from Beauharnois, which are not part of the capacity market? 2. “Resources” in the third paragraph should be the singular “resource”.
Section 4.1.2	<p>Recommend to revise: “...must register the capability to so with the <i>IESO</i> as...” to “...must register the capability to do so with the <i>IESO</i> as...”</p>
Section 4.1.3.3	<p>Does this section only apply in the [Dispatch Hour-1] timeframe?</p>

Section / Topic	Feedback
Section 4.3.1	<ol style="list-style-type: none"> 1. There is a typo in the passage: "Operating reserve offers – have committed capacity to an enteral control area..." 2. Recommend revising "'e-Tag ID" field must include the correct tag naming convention as described in Section 4.1.6: e-Tag;" to "'e-Tag ID" field must include the correct tag naming convention as described in section 4.1.3: e-Tag;"
Section 5	This section states that the virtual trader names will be used to identify dispatch data on virtual zonal resources. Please confirm if the virtual trader name will be the market participant name.
Section 7.1, Table 7-2	Table 7-2 describes timing of dispatch data submission but does not include timing for segregation mode. The paragraph following Table 7-2 provides the segregation mode timeframe through a reference to Market Rules Chapter 7 Appendix 7.7. OPG recommends to also include the segregation mode timing details in Table 7-2.
Section 7.2.1	If the standing dispatch data fails validation, would the non-failed portions of the dispatch data be used, or would the MP need to re-submit all of the standing dispatch data?
Section 7.4	Under the "Contingency plan" and "Alternative means of submission" sections, would the timelines (DAM / PD / RTM) be revised / extended if the IESO's electronic information system is unavailable, including tool failure, in order to account for the additional time it may take for MPs to submit the information via email or telephone as indicated?
Section 7.4	This section outlines alternate processes for MPs to submit data via e-mail or telephone. OPG recommends the IESO to include testing scenario(s) for email submission of offers during Market Trials and End-to-End Testing.
Section 7.4.3	In reference to the "price-quantity pair simplification", please clarify if this means that a max of five P,Q pairs per resource in total will be accepted via telephone.
Section 7.5.1	In reference to "No automated check", please clarify if this section indicates that if an MP increases the quantity of energy offer/bid above the materiality threshold (15%, 10 MW), the offer will be automatically accepted by the IESO tool, but the submission may be subjected to compliance assessment at a later time.

Section / Topic	Feedback
Section 7.5.2, Table 7-9	<p>Under Step 1, the MP must submit an increase to the Availability Declaration Envelope (ADE) with a reason code. The IESO has the discretion to accept or deny such a request. If the request is denied, the MP would have to provide a submission again with the original ADE value by the end of the mandatory window.</p> <p>Can the MP verbally request an ADE expansion with the IESO prior to an actual submission of ADE expansion request, to avoid the additional administrative work in the case the ADE expansion request is denied?</p>
Section 8.1, Table 8-1	Suggest revising "...contains a summary the dispatch data submitted for the day..." to "...contains a summary of the dispatch data submitted for the day..."
Appendix F.7	Please provide elaboration or graphical diagram explaining the " Submissions during the first 30 minutes of the hour ", similar to the diagrams provided in the October 3, 2023 Q&A session on the Market and Systems Operations batch for Generator Offer Guarantee eligible Non-Quick Start Generators.
Appendix A.1	The IESO Participant Tool Training page has documents dating to 2019, along with instructions for the current market. Would the IESO refresh the Participant Tool Training for Market Renewal?
Appendix B.3	With reference to the third paragraph of this section, if an MP submits an ADE offer for Resource A and is rejected, and the MP fails to submit a permissible replacement offer, would that result in Resource A not having any ADE offer in the market?
List of Acronyms	The List of Acronyms is incomplete for this market manual.

Market Manual 4.2

What feedback do you have on draft Market Manual 4.2?

Section / Topic	Feedback
Section 2.2	Please confirm that the deadline listed within the section is only applicable to critical <i>generation</i> equipment only. If not, please clarify the specific critical equipment this section would apply to.

Section / Topic	Feedback
Section 2.3.4	<p>Please provide a detailed process and timing overview for contacting the IESO for the treatment of MGBDT over midnight, including step-by-step actions required by the MP and the IESO, the timeline for such requests and the potential results.</p> <ol style="list-style-type: none"> 1. Is the process outlined in Section 2.3.4 applicable to DAM only? Would it be applicable to the Pre-Dispatch timeframe? 2. Please provide a listing of the expected outcomes to such a request and provide alternative scenarios, for example when the MP puts in a bridging request, the following could take place: <ol style="list-style-type: none"> a. The IESO extends the operating commitment for the current day in order to bridge the NQS resource schedule between the two dispatch days over the midnight period; or <p>The IESO removes the commitment for the NQS resource for the next day.</p>

Market Manual 4.3

What feedback do you have on draft Market Manual 4.3?

Section / Topic	Feedback
	No comment at this time.

Market Manual 4.5

What feedback do you have on draft Market Manual 4.5?

Section / Topic	Feedback
	No comment at this time.

Market Manual 7.1

What feedback do you have on draft Market Manual 7.1?

Section / Topic	Feedback
Section 2.2.1	OPG proposes to revise the last sentence of the last paragraph of this section from: "...actions and any mitigating steps to prevent reoccurrence." to "...and, where applicable, any mitigating steps to prevent re-occurrence."

Section / Topic	Feedback
Section 2.3.1	<p>The definition/conditions of the Normal Operating State have been removed, leaving only a reference to Market Rules Chapter 5 Section 2.2. The other Operating States (i.e. High Risk, Conservative, Emergency) have descriptions of what they are, conditions leading to declaration of such conditions, etc. An explanation of Normal Operating state would help to set the reader up to better understand the High Risk, Conservative, Emergency Operating States.</p> <p>OPG suggests that the IESO re-introduce the deleted Section 2.3.3 Normal Operating State.</p>
Section 2.3.2	<ol style="list-style-type: none"> <li data-bbox="553 562 1503 674">1. Please consider the addition of the terms "extreme cold weather" and "extreme hot weather" to the high-risk operating state conditions and their associated potential for impact to grid reliability. <li data-bbox="553 722 1503 873">2. The IESO states that it can "declare" a high-risk operating state, but under <i>IESO Actions</i> there is no mechanism stated as to how MP are informed of this declaration. Will an Advisory Notice be issued at the start and the end the High Risk Operating State?
Section 2.3.3	<ol style="list-style-type: none"> <li data-bbox="553 917 1503 1068">1. The IESO states that it can "declare" a conservative operating state, but under <i>IESO Actions</i> there is no mechanism stated as to how MP are informed of this declaration. Will an Advisory Notice be issued at start and end of the Conservative Operating State? <li data-bbox="553 1117 1503 1344">2. Under <i>IESO Actions</i>, it states that MPs may be required to suspend certain activities. How will this be communicated? Through Advisory Notice? Direct phone communication? The procedure for communication is clearly outlined under Section 2.3.4 for the Emergency Operating State. Perhaps a similar outline should be included in this section also.

Section / Topic	Feedback
Section 2.3.4	<ol style="list-style-type: none"> <li data-bbox="553 170 1503 359">1. Under <i>IESO Actions</i>, a declaration for the Emergency Operating State is made via the issuance of an Advisory Notice. The notification process is missing with regards to when the MPs will be informed of a return to the Normal Operating State. Please provide the communication process for the return to the Normal Operating State. <li data-bbox="553 407 1515 558">2. The third bullet under <i>IESO Actions</i> includes the term <i>facilities</i> location operator. The "location operator" is a new term and it is defined in a footnote on the bottom of the page. Suggest to include this term in Market Rules Chapter 11 Definitions. <li data-bbox="553 606 1515 873">3. The third bullet under <i>IESO Actions</i> uses the term "operating instructions", but the context in this paragraph does not align with the definition given in the current Market Manual 7.6, Glossary of Standard Operating Terms (IMP_GOT_0002, Issu 10.0). OPG's understanding is that IESO is moving away from the use of the term "reliability directive" and towards "operating instruction". There should be clear a definition for "operating instruction".
Section 3.1	This section contains the deleted Section 1.2.4 Voice Communication. There is valuable information provided within this passage, OPG recommends the IESO to restore this section.
Section 3.2.1, Communication Facilities	"Expediently" is qualitative and not quantitative, and can be open for interpretation under compliance requirements. Please clearly define what is the expectation of the term "expeditiously" for compliance purposes.
Section 3.2, Operating Instructions to Transmitters and Distributors	<p data-bbox="505 1230 1203 1262">Recommend updating the section numbering to 3.3.2.</p> <p data-bbox="505 1310 1495 1419">"Prompt compliance" is qualitative and not quantitative. Please provide clear requirement regarding "prompt compliance" (i.e. how many minutes) for compliance purposes.</p>
Section 3.3	Further to the note from Section 2.3.4 regarding the meaning of "operating instruction", this section defines the term in a footnote as "having the meaning ascribed to it in <i>NERC Reliability Standards</i> ." This definition contrasts with the definition found in the current Market Manual 7.6. It is recommended that the IESO review the use of the term "operating instructions" throughout the market rules and manuals for consistency in its use.

Section / Topic	Feedback
Section 3.3.1	In the paragraph <i>Removal from Service</i> , the term “immediately” is used to describe location operator response to an instruction. Elsewhere in the Market Rules and Manuals the term “promptly” is used, and its meaning is clarified in a footnote as being within 5 minutes. As a result of this comparison, OPG recommends the IESO to quantify the term “immediately”, as the term can be subjective and can result in compliance risk to MPs if not clarified.
Section 4.0	OPG recommends restoring the removed definition for Normal Operating under Section 4.0 heading for reader clarity.
Sections 4.2.2.1, 4.2.2.2 and 4.2.2.4	These three sections have “upward” reference to market rules for procedures and processes associated with synchronization and desynchronization. The Market Rules usually provides the guidelines and the Market Manuals provides the specific procedures. The references in these sections are the reverse of the normal governance structure. Was this intentional?
Section 4.2.5	Please provide examples of “ <i>any matters outside the scope of commercial operations on the IESO-controlled grid</i> ” to help guide MPs in the understanding of this requirement.
Section 5	There is reference to the High-Risk and Emergency Operating States as abnormal conditions. Should the Conservative Operating State be considered an abnormal condition?
Section 5.1	<ol style="list-style-type: none"> 1. Under <i>IESO Directions</i>, both “reliability directive” and “operating instruction” terms are used. It would be useful to MPs for the IESO to provide a clear delineation of the difference between the two terms, particularly considering the movement away from “reliability directive” towards “operating instructions”. Please clearly define what are the requirements under each term, when the terms are to be used and followed and the difference in MP response when each of the term is triggered. 2. The paragraph <i>Emergency Operating State Control Actions (EOSCA)</i> mentions the use of pre-recorded broadcast telephone message. Has this option been triggered in the IESO Administrative Market? Please provide the distribution list for the broadcast telephone message. 3. The paragraph <i>Status updates and Extra-Provincial Contingencies</i> indicates that the IESO will inform MPs via Advisory Notices, while the <i>Restrictions to Auxiliaries</i> paragraph indicates communication to MP, but does not provide the method of communication. Please clarify the method of communication for the second instance within the text.

Section / Topic	Feedback
Sections 5.2.1 and 5.2.4	In paragraph <i>Matters requiring reporting</i> , “auxiliary equipment” is referred to as a defined terms, and points to the “Defined Term” section on page 99. Under the context of the Market Rules and Market Manuals, “defined terms” are terms that appears in Market Rules Chapter 11. If “auxiliary equipment” is a proper defined term, it should be identified in Chapter 11. Otherwise, the “defined term” terminology should not be used in referring to “auxiliary equipment” in the market manual.
Section 6	NSRC standard CIP-008 requires entities to also report attempts to compromise. Would the MP decide on what constitutes an attempt to compromise? Or would the IESO define the scope of the attempts that needs to be reported? Clear guidance would provide clarity and reporting consistency for both MPs and the IESO.
Section 7.3	In paragraph <i>Failure and cost recovery</i> , DA-PCG has been replaced by day-ahead make-whole payment. These two settlement processes are not the same. Please provide the rationale for this replacement.
Section 10, Table 1	<ol style="list-style-type: none"> 1. The term SBG should be included in the List of Acronyms. 2. The following sentence is not clear in conveying its meaning: “Include incremental export transactions beyond two hours before the dispatch hour. This action will allow additional export transactions to be scheduled.” OPG suggesting adding a diagram to explain the intent of the sentence and its impact on trades. For example, is there a risk that an export will proceed under economic conditions not intended by the trader? 3. There is confusion regarding how curtailing linked wheel-throughs provides relief if both ends of the wheel-through are curtailed, i.e. if the net relief is 0 MW. OPG interprets the condition as the IESO is not allowed to curtail only the import leg of a wheel through, and therefore the entire wheel-through is curtailed. This now creates room on the ties for pure exports. 4. OPG believes that the term “TLRe-MAX” should be “ADQh-MAX” in <i>“Note: such curtailments are tagged TLRe-MAX.”</i>
Appendix B, Table B-1	Item 21 and Item 31 are new and state: “Include incremental import transactions beyond two hours before the dispatch hour”. As per the concern expressed in Section 10 Table 1, please provide further clarification on this requirement and how it may impact economic/non-economic trades.

Section / Topic	Feedback
Appendix B, Table B-2	Item 3 refers to Footnote 13, should the reference be Footnote 23?

Market Manual 7.2

What feedback do you have on draft Market Manual 7.2?

Section / Topic	Feedback
General	The term “publish” or “publishes” is a defined term and has not been italicized throughout the document appropriately.
Sections 3.1 and 3.2	Do the demand forecasts in these reports represent extreme weather, weather normal or actual weather?
Section 3.1.2	In accordance with Market Rules Chapter 5 Section 7.3.1.4, it is stated that the report will be published daily, however the Adequacy Report for Day 2 to 34 is published twice daily. The specific timing for when in each day the reports are expected to be published is not provided.
Section 3.4	Specific timing for when in each hour the Day 0 to Day 2 and in each day the Day 3 to Day 34 reports is expected to be published is not provided. Please clarify when in each hour and day the respective reports should be expected to be published.
Appendix C	Please clarify how Energy Storage resources are addressed in the Forecast Supply and Forecast Demand in the Adequacy Reports.
Appendix D	For the second paragraph, please clarify the interfaces that are referenced from Market Rules Chapter 5 Section 7.4.2. The market rule section does not contain interfaces list.
Appendix C, Table D-1	The internal interfaces listed in Table D-1 are not marked as redlined, and it is assumed that they already exist in the current Transmission Limits reports. However, upon reviewing the current report, it is evident that there are several interfaces that do not align with Table D-1 and the current Transmission Limits reports. Please provide clarification regarding this misalignment.
Appendix E	The GRH definitions should be formatted similar to other appendices with a definition section.

Section / Topic	Feedback
General	Definitions for GRH, SBG, and Baseload Generation should be included as defined terms in Market Rules Chapter 11.
General	Please clarify and confirm how the timelines outlined in Market Manual 7.2 will be incorporated into the technical specification report, which is targeted for release in Q1-2024. Please ensure the alignment of the Market Manual 7.2 timelines with the report's content and delivery.
References	Hyperlink provided to NPCC Directory 5: Reserve document is not functioning correctly.

Market Manual 7.3

What feedback do you have on draft Market Manual 7.3?

Section / Topic	Feedback
Section 4.3.1	In the definition of "Best Efforts" the term "Reasonable Effort" is introduced. Please quantify or provide the definition of "Reasonable Effort".
Section 4.5	The hyperlink to IESO portal is not functioning correctly.
Section 3.2.1, Table 4-3	Recommend the table to be revised to clarify insignificant changes rather than referring to Section 3.2.1.3, which only defines significant changes.
Section 5.1.4	Please provide a list of Critical Transmission Elements.
Section 5.1.4	Please clarify if the deadline in Section 5.1.4.1 is referring to critical transmission equipment only while Market Manual 4.2 Section 2.2 is the deadline for critical generation equipment.
Section 5.1.4.1	The IESO uses the term "outage" within the first and second paragraph of this section, while the section header uses the term "operation". These two terms can have significantly different meanings. Please clarify which is the true intent of this section: an operation or an outage.
Section 5.3.2	Please provide additional information on the process for appointing a test coordinator.
References	Recommend updating this section with appropriate hyperlinks to all documents.

Market Manual 7.4

What feedback do you have on draft Market Manual 7.4?

Section / Topic	Feedback
Section 2	<p>This comment is regarding the listing order of the four IESO operating states: Normal, Conservative, High-Risk and Emergency.</p> <ul style="list-style-type: none">• In the previous version of Market Manual 7.4, the listing order was written as: High-Risk, Conservative, Normal and Emergency.• In the current draft of Market Manual 7.4, the listing order is written as: Normal, High Risk, Conservative and Emergency.• The order in the draft version of Market Manual 7.1 is listed as: Normal, Conservative, High Risk and Emergency. <p>It appears that the operating states are listed in order of escalating degradation of the system. OPG recommends that the listing order be consistent across all market rules and manuals, and proposes the following order: Normal, Conservative, High-Risk and Emergency.</p> <p>It is noted that this draft of Market Manual 7.4 contains a definition of the Normal Operating State. This definition has been removed from Market Manual 7.1 (see Market Manual 7.1 Section 2.3.1 comment). Please revise for alignment between the market manuals. The recommendation is to include the definition of Normal Operating State in the market manuals for reader clarity.</p>

General Comments/Feedback

The market manual changes relating to format, style, and the re-organizing existing material improves the readability of the manuals, such as the bolded paragraph intro headers. The inclusion of the List of Acronyms as an appendix in each of the market manuals is a welcome improvement. Corrections made to align the use of SI terms/symbols with proper convention is appreciated.

OPG thanks the IESO for the opportunity to provide comments to the Market and System Operations Batch of Market Rules and Manuals.