

OPG Feedback on Replacement of the IESO Settlement System (RSS): MR-00472-R00)

Feedback Provided by:

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1. NoD Process

The following questions are based on the IESO-provided document “**NOD-Dispute Flow and Scenarios**”.

- Please confirm the following:
 - The RCSS process flow will not require Market Participants to file multiple NoDs for the same statement issue.
 - A NoD on a PSS/FSS/RCSS can be kept open for investigation up to 23 months (if the MP does not agree with any statements issued), and will only be closed before that if either the MP agrees to the solution or the issue is escalated to Dispute process.
- Regarding the box labelled “**Recalculated Settlement Statement (RCSS 1-6 – Optional)**”:
 - Please clarify that RCSS statements are monthly and could include transactions for any trade days in the same month within the RCSS schedule, e.g. RCSS1 is for month M-2. Please confirm that RCSS statements are not issued by Trade Date like PSS and FSS.
 - Please confirm that the section under “Contents” should read “*Settlement amounts from previous **RCSS** statements are copied...*” Please confirm that RCSS statements will not copy information from PSS and/or FSS.
 - Please clarify that RCSS statements are **optional**. That is, please confirm that once an MP has agreed with a NoD decision or escalated to the Dispute process by **RCSS_N**, no further **RCSS_N+1** nor **RCSS_Final** statement is required.
 - With respect to the “NOD” box to the right of RCSS 1-6 box, please clarify which statements are referred to by “*earlier settlement statements*”.
- Regarding the box labelled “**Final Recalculated Settlement Statement (RCSSF)**”:
 - Please confirm that the section under “Contents” should read “*Settlement amounts from previous **RCSS** statements are copied*” That is, please confirm that the RCSS statement will not copy information from the PSS and/or FSS.
 - Please clarify whether the **RCSSF** statement is **optional or mandatory**. If a NoD decision is agreed or escalated to the Dispute process by **RCSS_N**, will an **RCSSF** be issued? For

example, if the issue has been resolved and agreed in RCSS2, should participants expect an RCSS3, ..., RCSS6, or RCSSF?

2. Non-Physical Markets Settlements

- Please clarify how the new RCSS process aligns with non-physical markets settlements.

3. Metering

- Chapter 6A Appendix 6.3 section 1.4.3: OPG is still in the process of reviewing the *cost impact* and *process feasibility* of the increased frequency of testing required by this amendment. OPG will provide further feedback following this assessment.
- Chapter 6 section 10.4.2 states that “if a metered market participant becomes aware of an error...” they must “...provide notice to the IESO of such error within two business days”. Please clarify the intent of this requirement, and please clarify the applicable scenarios in Market Rules.
- Please confirm that the new requirement has been stakeholdered with key participants like Meter Service Providers.

4. Implementation Timelines

- OPG appreciates that the IESO is aware of the challenge of managing RSS and Market Renewal projects in parallel, and is considering release required document as early as possible. With respect to Market Renewal, the following documents are critical for MPs to receive in order to begin IT development tasks:
 - IESO Charge Types and Equations
 - IESO Format Specifications for Settlement Statement Files and Data Files
 - RCSS NOD-Dispute Flow and Scenarios
- Please clarify when the IESO expects to release the Market Settlements Market Rules and Manuals for Market Renewal, and whether these documents will include the changes contemplated under the RSS project (i.e., new **Charge Types, RCSS, new statement format**, etc.)
- In the event that the Implementation Date of RSS (Nov 1st 2022) is postponed, please consider a revised implementation date no earlier than **Feb 1st 2023** as most MPs undergo a year-end system freeze period as well as other critical financial year-end processes.

5. Legislation/Regulatory Changes

- Please identify the regulations within the Electricity Act that have been amended to implement the new settlement limitation period.
- Please confirm at what stage of implementation the amendment to the Electricity Act sits, and when the IESO expects the amendment to come into force. Will the amendment be included in a batch of changes?