

Market Renewal Program Feedback Form

Market Renewal Program: Market System and Operations Stakeholder Feedback

Feedback Provided by:

Name: Vlad Urukov

Title: Technical Panel – Generator Representative

Organization:

Email:

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Section/Topic	Feedback
<p>1.32.2 The IESO shall administer, in accordance with sections 3 to 8, the following <i>real-time</i> markets in an integrated fashion:</p> <p>1.32.2.1 a <i>day-ahead market</i> in <i>energy</i>, measured in MWh (comprised of physical transactions and virtual transactions); and</p> <p>1.32.2.2 a <i>day-ahead market</i> in several classes of <i>operating reserve</i>, measured in MW- (comprised of physical transactions);</p> <p>1.32.2.3 a <i>real-time market</i> in <i>energy</i>, measured in MWh (comprised of physical transactions); and [Intentionally left blank – section deleted]</p> <p>1.2.2.4 a <i>real-time market</i> in several classes of <i>operating reserve</i>, measured in MW (comprised of physical transactions).</p>	<p>While I understand the applicability of “integrated fashion” when applied to a real time energy and OR markets (i.e., joint optimization), does this term make sense across Day Ahead AND real-time. These are distinct markets with integrated Energy and OR, but not integrated across all four bullets.</p> <p>Why is OR thought as comprised of “physical transactions”. I understand the distinction to “virtual” but perhaps there is more appropriate terminology for reserve, which is a stand by product.</p>
<p>1.6.1 The following parameters of the <i>day-ahead market calculation engine, pre-dispatch calculation engine</i> and <i>real-time calculation engine</i> shall be as specified from time to time by the IESO Board:</p> <p>1.6.1.1 the <i>maximum market clearing price</i> that defines the maximum allowable price for <i>energy</i>, and the negative of which defines the minimum allowable price for <i>energy</i>;</p> <p>1.6.1.2 the <i>maximum operating reserve price</i> that defines the maximum allowable price for any class of <i>operating reserve</i>;</p> <p>1.6.1.3 the constraint violation penalties; and</p> <p>1.6.1.4 the <i>settlement floor price</i> for <i>energy</i>.</p>	<p>The MMCP is a defined term. I propose the definition is repeated here rather than coming up with new language.</p> <p>The MORP is a defined term. I propose the definition is repeated here rather than coming up with new language.</p> <p>Also, if the “by the IESO board” is a change to MMCP and MORP, propose language is added to Chapter 11 definitions as it exists for “Settlement floor price for energy”</p> <p>Correct “;” to a “.” For 1.6.1.4</p>
<p>variable generation means all <i>energy that is supplied by a variable generation resource; wind and solar photovoltaic resources with an installed capacity of 5MW or greater, or all wind and solar photovoltaic resources that are directly connected to the IESO-controlled grid;</i></p> <p>variable generator means a <i>generator</i> whose <i>generation facility</i> is classified as variable generation;</p>	<p>Can we confirm that variable generation resource is defined. Seems there is a term missing in the latest revision of Ch 11</p>
<p>1.6.2 The IESO Board shall establish floor prices for <i>energy offers</i> from a <i>registered market participant</i> associated with a <i>variable generation resource</i> and for <i>energy offers</i> from a <i>generation resource</i> that has a component classified as <i>flexible nuclear generation</i>, in accordance with the applicable <i>market manual</i>.</p>	<p>These were subject to public consultation. Check if IESO Board is appropriate and/or additional language should be added to stipulate the process and participant engagement</p>
<p>1.6.3 The IESO shall establish the following limits for <i>virtual transactions</i> for any <i>virtual transaction zone</i>:</p> <p>1.6.3.1 <i>energy lamination volume limit</i>; and</p> <p>1.6.3.2 <i>offer or bid quantity limit</i>.</p>	<p>What is a “lamination volume limit”?</p>
<p>1.6.4 The IESO shall suspend the <i>day-ahead market</i> or <i>real-time market</i> as required in accordance with section 13. If the IESO suspends the <i>day-ahead market</i> or <i>real-time market</i> for a given <i>dispatch day</i>, the IESO shall:</p> <p>1.6.4.1 inform <i>market participants</i> of the suspension the impacted trade date, hours and cause of error if practicable;</p> <p>1.6.4.2 inform <i>market participants</i> of when normal <i>market operations</i> is expected to resume; and</p> <p>1.6.4.3 apply <i>administrative pricing</i> in accordance with section 8.4A.</p>	<p>Why “for a given dispatch day”. Wouldn’t the same apply even if it is for a given “hour”? Propose “during a given dispatch day”</p> <p>I don’t think “administrative pricing” is defined – “administrative price” is</p>
<p>1.6.6 If the IESO determines the issuance of specific types of information from engine results may facilitate anti-competitive behaviour, the IESO may limit the issuance of such information through an <i>urgent amendment</i> to these <i>market rules</i>. The IESO shall advise the <i>market surveillance panel</i> of the matter. The IESO Board may request the advice of the <i>market surveillance panel</i> of the need or otherwise for the <i>urgent amendment</i> to remain in effect.</p>	<p>Use defined terms or at least use “calculation engines”. Is it issuance or publication?</p> <p>What is an example of such information?</p>

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<p>2.1.1.4 in accordance with sections 22.1.3 and 22.6.3, that person has provided to the IESO all relevant materials the IESO may require to determine <i>reference levels</i> and <i>reference quantities</i> for that person's <i>resources</i> and the IESO has registered all applicable <i>reference levels</i> and <i>reference quantities</i> for that person's <i>resources</i>;</p>	<p>In case there is an active dispute when the new market is operationalized, what reference levels will the IESO use – should that possibility be recognized in the market rules.</p>
<p>2.1.3 Subject to sections 2.3 and 10.2.6, no person that intends to participate in the IESO-administered markets or to cause or permit <i>electricity</i> or any <i>physical service</i> to be conveyed into, through or out of the <i>integrated power system</i> shall be required to register a <i>facility</i> to or from which the <i>electricity</i> or <i>physical service</i> is to be so conveyed as a <i>facility</i> and any associated <i>resources</i> registered with the IESO if such <i>facility</i> is embedded within a <i>distribution system</i>, a <i>load facility</i>, a <i>generation facility</i> or an <i>electricity storage facility</i> and that:</p> <p>2.1.3.1 in the case of a <i>generation facility</i>, has a maximum rated <i>generation capacity</i>, net of auxiliary requirements, of less than 1 MW;</p> <p>2.1.3.2 in the case of a <i>load facility</i>, has a maximum load capacity of less than 1 MW;</p> <p>2.1.3.3 in the case of a <i>distribution system</i>, has a maximum load capacity of less than 1 MW; or</p> <p>2.1.3.4 in the case of an <i>electricity storage facility</i>, has a maximum capacity for <i>energy</i> for each of injections and withdrawals, net of auxiliary requirements, of less than 1 MW.</p>	<p>I don't understand 2.1.3.3 the case "in the case of a distribution system" when 2.1.1 refers to "facility embedded within a distribution" system.</p> <p>Even if corrected to include "facility embedded within a distribution", confirm the 1MW applies (if its embedded)</p>
<p><u>start indication value means the minimum quantity of energy in MW that a resource must be scheduled to determine whether the generation units associated with the resource have used one or more of the submitted maximum number of starts per day;</u></p>	<p>"Maximum number of starts per day" is a defined term – italicize.</p>
<p>2.2.6A.2 a <i>start indication value</i>. A <i>registered market participant</i> that elects to submit a <i>start indication value</i> shall provide one or more <i>start indication values</i> not exceeding the number of <i>generation units</i> associated with the <i>resource</i>;</p> <p><u>start indication value means the minimum quantity of energy in MW that a resource must be scheduled to determine whether the generation units associated with the resource have used one or more of the submitted maximum number of starts per day;</u></p> <p>maximum <u>number of starts</u> per day is means the number of times that a unit resource can be started within a <i>dispatch day</i>;</p>	<p>Change "not exceeding ..." to limited to the number of. Current wording suggest the value has to be less then the number of units, which is not the case.</p> <p>Not clear if stars will increment once the schedule is again lower than the number</p>
<p>2.2.6A.3 whether it intends to submit <i>hourly must run</i>;</p> <p>2.2.6A.4 <i>forebay</i> and any associated <i>time lags</i>.</p>	<p>Add "and" after ";"</p> <p>Clarify if these forbays need to be linked, as the timelag is only a feature of the linked forebay</p> <p>Consider adding specificity in terms of which forebays have</p>
<p>2.2.9 A <i>market participant</i> may request to register as a <i>self-scheduling generation facility</i> any <i>generation facility</i>.</p> <p>2.2.9.1 that has a name-plate rating of individual components of equipment <u>that</u> collectively adds up to 1 MW or more but is less than 10 MW; <u>or</u></p> <p>2.2.9.2 that is a <i>commissioning generation facility</i> of any name-plate rating and that is sought to be registered pursuant to section 2.2A.1; or</p> <p>2.2.9.23 that is a <i>cogeneration facility</i> or <i>enhanced combined cycle facility</i> that has a name plate rating of individual components of equipment that collectively adds up to 10 MW or more provided that the IESO determines that there are no adverse impacts on the <i>reliable</i> operation of the IESO-controlled grid of the <i>facility</i> being registered as a <i>self-scheduling generation facility</i>.</p>	<p>What is the reason for removal of "commissioning generation facility" while 2.2A still states "in accordance with section 2.2". Now section 2.2 doesn't have any made mention of commissioning.</p>

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<p>2.2A Registration of Commissioning Generation Facilities</p> <p>2.2A.1 A market participant may apply to register a commissioning generation facility as a self-scheduling generation facility, in accordance with section 2.2, for the purpose of being permitted to convey electricity or a <i>physical service</i> into, through or out of the <i>integrated power system</i> or of participating in the <i>real-time markets</i> during the period in which the commissioning generation facility is undergoing the commissioning tests referred to in section 2.2A.4.</p> <p>2.2A.2 The <i>IESO</i> shall approve an application for facility registration of to register a commissioning generation facility as a self-scheduling generation facility if the <i>IESO</i> is satisfied that the commissioning generation facility meets the requirements of provided by section 2.2 have been met applicable to <i>generation facilities associated with a self-scheduling generation resource</i>. Any such registration shall expire upon completion by the commissioning generation facility of the final commissioning test submitted to and approved by the <i>IESO</i> pursuant to section 2.2A.4.</p> <p>2.2D.6 Except as otherwise provided in this section 2.2D, where a commissioning electricity storage facility has been registered by the <i>IESO</i> pursuant to section 2.2D.2, the <i>IESO</i> shall, while such registration is in effect, treat the commissioning electricity storage facility as one or more a <i>self-scheduling electricity storage resources</i> for all</p>	
<p>2.2.11 The <i>IESO</i> shall approve a request for registration as a <i>self-scheduling generation facility</i> or a <i>self-scheduling electricity storage facility</i> if the information required by this section 2.2 is provided and the <i>IESO</i> determines that self-scheduling the <i>participation of the facility</i> those facilities and any associated <i>resources</i> will not have a material adverse effect on power system <i>security</i>.</p>	<p>Why is the word “associated” deleted? The term resources is not mentioned in the first part of the sentence and therefore the term “those ... resources” is unclear – what resources is this referring to?</p>
<p>2.2.19 A market participant for a <i>load resource</i> may request to change its that resource’s <i>load participation type</i> resource type as either a <i>dispatchable load</i>, <i>non-dispatchable load</i>, or <i>price responsive load</i> as follows:</p> <p>2.2.20 Once the change to a <i>non-dispatchable load</i> takes effect in accordance with subsection 2.2.1925.3, the <i>market participant</i> shall not change its that resource’s <i>load participation type</i> resource type back to a <i>dispatchable load</i> or a <i>price responsive load</i> in accordance with subsections 2.2.1925.1 or 2.2.1925.2, as the case may be, for at least 12 months 180 calendar days from the effective date of the change.</p>	<p>Could you explain why changing to a DL required 180 days in comparison to the 75 days for any other direction of change on the load side (including from a DL to NDL or PRL)</p> <p>2.2.20 adds confusion in relation to 2.2.19.2 which gives a 75 day window.</p>
<p>2.2.21 A <i>registered market participant</i> for a <i>generation resource</i> shall be eligible for the real-time generator offer guarantee or day-ahead generator offer guarantee if, as part of the registration process under this section 2.2, the <i>market participant</i> provides the <i>resource</i> specific information as further specified in Chapter 9 required for a GOG-eligible resource.</p> <p>2.2.22</p> <p>generator offer guarantee eligible resource or GOG-eligible resource means a <i>dispatchable non-quick start resource</i>:</p> <ul style="list-style-type: none"> (i) with a registered elapsed time to dispatch greater than one hour; (ii) with a registered minimum loading point greater than 0 MW; (iii) with a registered minimum generation block run-time greater than one hour; and (iv) its primary or secondary fuel source is not uranium. 	<p>Where is the “resource specific information” listed (see Deletion of Ch 9). Also, isn’t there a further requirement as to what some of the information is to actually contain – see definition requirements.</p>
<p>2.2A.2 The <i>IESO</i> shall approve an application for facility registration of to register a commissioning generation facility as a self-scheduling generation facility if the <i>IESO</i> is satisfied that the commissioning generation facility meets the requirements of provided by section 2.2 have been met applicable to <i>generation facilities associated with a self-scheduling generation resource</i>. Any such registration shall expire upon completion by the commissioning generation facility of the final commissioning test submitted to and approved by the <i>IESO</i> pursuant to section 2.2A.4.</p> <p><i>self-scheduling generation facility</i> means a <i>generation facility</i> comprised of one or more generation units that are each exclusively associated with a self-scheduling generation resource located within the <i>IESO control area</i> that can operate independently of <i>dispatch instructions</i> from the <i>IESO</i>;</p> <p>self-scheduling generation resource means a <i>generation resource</i> that can operate independently of <i>dispatch instructions</i> from the <i>IESO</i>;</p>	<p>Why does 2.2A.2 use the term “generation facilities associated with a self-scheduling generation resource” while applied to “commissioning generation facility” rather than the term “self-scheduling generation facility”, which is already defined based on a “self-scheduling generation resource”</p>

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<p>2.2A.1 A <i>market participant</i> may apply to register a <i>commissioning generation facility</i> as a self-scheduling generation facility, in accordance with section 2.2, for the purpose of being permitted to convey electricity or a <i>physical service</i> into, through or out of the <i>integrated power system</i> or of participating in the real-time markets during the period in which the <i>commissioning generation facility</i> is undergoing the commissioning tests referred to in section 2.2A.4.</p> <p>2.2A.2 The <i>IESO</i> shall approve an application for facility registration to register a <i>commissioning generation facility</i> as a self-scheduling generation facility if it the IESO is satisfied that the <i>commissioning generation facility</i> meets the requirements of provided by section 2.2 have been met applicable to generation facilities associated with a self-scheduling generation resource. Any such registration shall expire upon completion by the <i>commissioning generation facility</i> of the final commissioning test submitted to and approved by the <i>IESO</i> pursuant to section 2.2A.4.</p> <p>2.2A.3 Upon expiry of the registration referred to in section 2.2A.2, a <i>market participant</i> shall not participate in the day-ahead market or real-time market nor cause or permit electricity or any <i>physical service</i> to be conveyed into, through or out of the <i>integrated power system</i> in respect of a former <i>commissioning generation facility</i> unless such former <i>commissioning generation facility</i> has been registered as a generation facility, other than pursuant to this section 2.2A, in accordance with section 2.2.</p>	<p>Why does 2.2.A.3 refer to participation in the day ahead or real time markets, whereas 2.2.A.1 refers to participation in only the real time market.</p>
<p>3.1.11 A <i>registered market participant</i> that intends for its <i>dispatchable generation resources, dispatchable electricity storage resources, dispatchable loads, or hourly demand response resources</i> to be eligible for <i>dispatch</i> by the <i>IESO</i> for a given <i>dispatch hour</i> of a <i>dispatch day</i> shall establish an <i>availability declaration envelope</i> by submitting a <i>bid</i> or <i>offer</i>, as applicable, for <i>energy</i> in the <i>day-ahead market</i> in accordance with section 3.2.1 on the resource for the applicable <i>dispatch hour</i>, subject to section 3.1.14.</p>	<p>Is it “for” the resource?</p>
<p>3.1.12 If a <i>registered market participant</i> for a <i>dispatchable generation resource</i> or a <i>dispatchable electricity storage resource</i> does not establish an <i>availability declaration envelope</i>, the <i>resource</i> shall not operate in the <i>real-time market</i> without the approval of the <i>IESO</i> under section 3.1.14.</p> <p>3.1.13 If a <i>registered market participant</i> for a <i>dispatchable load</i> or an <i>hourly demand response resource</i> does not establish an <i>availability declaration envelope</i>, the <i>resource</i> shall not operate in the <i>real-time market</i> as a <i>dispatchable load</i> or <i>hourly demand response resource</i> without the approval of the <i>IESO</i> under section 3.1.14, except for the portion of <i>energy</i> identified to be consumed as a <i>non-dispatchable load</i> in accordance with section 3.3.3.1.</p> <p>3.1.14 The <i>IESO</i> shall approve an increase to the <i>availability declaration envelope</i> of a <i>resource</i> if:</p>	<p>3.1.12 and 3.1.13 refer to instances when an ADE is not established, meaning its not set whereas 3.1.13 speaks to an increase presumably from a set value. Seems like 3.1.14 need to be amended to reflect an approval of something more than an increase to cover section 3.1.12/13</p>
<p>3.2.1 A <i>registered market participant</i> that submits <i>dispatch data</i> for the <i>day-ahead market</i>, shall submit such <i>dispatch data</i> during the <i>day-ahead market submission window</i> unless the <i>registered market participant</i> has submitted <i>standing dispatch data</i> in accordance with section 3.3.9. A <i>registered market participant</i> may also submit <i>dispatch data</i> for the <i>day-ahead market</i> during the <i>day-ahead market restricted window</i> as permitted by section 3.2.4.</p>	<p>Are “day-ahead market submission window”, “day ahead market restricted window” and “standing dispatch data” defined terms?</p>
<p>3.2.4 During the <i>day-ahead market restricted window</i>, <i>dispatch data</i> submissions shall require <i>IESO</i> approval in accordance with section 3.2.5.</p> <p>3.2.5 The <i>IESO</i> may approve <i>dispatch data</i> submitted during the <i>day-ahead market restricted window</i> if the <i>IESO</i> is unable to receive <i>dispatch data</i> submissions during the <i>day-ahead market submission window</i> due to a failure in or <i>planned outage</i> of the software, hardware or communications systems that support the submission of <i>dispatch data</i>, as determined by the <i>IESO</i>.</p> <p>3.2.6 Subject to section 3.2.4, the <i>IESO</i> shall use the most recent <i>dispatch data</i> submitted by <i>registered market participants</i>, provided that it is received by the <i>IESO</i> before 10:00 EPT on each day prior to the relevant <i>dispatch day</i>, as inputs into the <i>day-ahead market calculation engine</i> in accordance with section 3.</p>	<p>In what case will the IESO use 3.2.6 (most recent dispatch data) in the context of 3.2.4 which states the IESO will approve submission within a window. Is this saying that if the IESO DOES NOT approve as per 3.2.4, the IESO WILL then use the data submitted before 10:00 EPT on the day prior?</p> <p>It is not very clear with the current wording</p> <p>Is EPT deliberate, where EST is used elsewhere?</p>
<p>3.3.2 For the purposes of this section 3.3, any <i>dispatch data</i> submission made during the <i>pre-dispatch process</i> on a <i>resource</i> for any <i>dispatch hour</i> shall be deemed to constitute a revision to <i>dispatch data</i> or revised <i>dispatch data</i>.</p>	<p>“on a resource” or “for a resource”?</p> <p>What is the difference between a revision to dispatch data and revised dispatch data.</p> <p>What is the significant of this section of the MR?</p>
<p>3.3.1 The <i>IESO</i> shall use the following types of <i>dispatch data</i> submitted by <i>registered market participants</i> to determine the <i>pre-dispatch schedule</i> in accordance with section 5 and Appendix 7.5A;</p>	<p>Change “;” to “:”</p>

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<p>3.3.3.2 A registered market participant for a dispatchable load, hourly demand response resource or dispatchable electricity storage resource that has established its availability declaration envelope may revise its bid during the real-time market unrestricted window provided that the revised bid does not increase the resource's availability declaration envelope which, for the avoidance of doubt, excludes the portion of energy a dispatchable load identified to be consumed as a non-dispatchable load. Revised bids that seek to increase the resource's availability declaration envelope shall require IESO approval under section 3.1.14 or in accordance with the applicable market manual.</p>	<p>What is the significance of the reference to market manual? In what circumstance will the MM allow for a revised ADE</p>
<p>3.3.3.4 During the real-time market unrestricted window for dispatch hours where a GOG-eligible resource has received a day-ahead operational schedule, its registered market participant shall not increase its (i) speed no-load offer, or (ii) energy offer price for quantities up to and including its minimum loading point, above the latest offer submitted for the corresponding dispatch hour under section 3.1.11.</p>	<p>Is the intent of this statement that a GOG-eligible resource scheduled in DA can not increase SNL and can not increase the prices for quantities upto MLP from the last DA offer price.</p> <p>If so, suggest clarifying as "above the latest offer price corresponding to this quantity"</p>