

# Stakeholder Feedback and IESO Response

## Market Renewal Program: Market Settlements, Metering, Market Billing and Funds Administration market rule amendment proposal posted on December 1, 2022

The IESO posted updated Market Settlements, Metering and Market Billing and Funds Administration batch draft market rules and market manual amendments on December 1, 2022 and received written feedback.

Related materials have been posted on the IESO **MRP stakeholder engagement webpage** for this engagement. If interested, please visit the webpage to reference the feedback submissions directly as the below uses excerpts and/or a summary of the stakeholder feedback for the purposes of providing an IESO response.

Please contact IESO Engagement at [engagement@ieso.ca](mailto:engagement@ieso.ca) if you have any questions.

## Atura Feedback and IESO Responses

ID	Section	Feedback	IESO Response
1	MR Ch.11 Definitions - Broad Constrained Area (BCA)	<p>The term Broad Constrained Area is referenced in the MRP Design Documents and in materials provided in the December 2022 &amp; January 2023 Engagement Webinars.</p> <p>However, the term is not defined in Chapter 11 nor is it listed in section 22.10 of Chapter 7 - Designation of Constrained Areas. However, the term BCA is found in section 5 of Chapter 9.</p> <p>Can the IESO confirm if this is intentional and provide an explanation?</p>	<p>Broad Constrained Area (BCA) is not intended to be a defined term and the draft has been amended accordingly.</p> <p>BCA is generally described in Chapter 9 and its appendices, as a specific conduct test or specific conditions used in the settlement mitigation process. Each instance it is used, outside of headings, is accompanied with the relevant cross-reference and the intent and meaning should be clear even in the absence of a definition.</p> <p>In regards to Chapter 7, since BCAs are not designated, compared to Narrow Constrained Areas and Dynamic Constrained Areas, BCA's were intentionally excluded from section 22.10 of Chapter 7. Resources meet BCA conditions based only on the information within a particular run of the pre-dispatch or day-ahead calculation engine, and hence there is no designation of a constrained area nor a defined term for BCA.</p>

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2	MM 14.2 s.5.2.1 - Changes to Reference Levels	<p>A resource may request for a temporary revision to the fuel cost component of a reference level for a resource provided that supporting documentation(s) are submitted to the IESO to substantiate the request. Section 5.2.1 of MM 14.2 outlines a list of acceptable documentation.</p> <p>Fuel invoices will not be available until 10 business days after the end of the settlement month and as such, fuel invoices cannot be utilized to support a request. Over the counter fuel procurement are typically conducted over Instant Messaging (“IM”) or via text messages.</p> <p>Can the IESO confirm if copies of quotes or firm purchases with gas marketers via IM or text are acceptable documentation?</p> <p>To the extent that firm gas transportation services are limited or have been fully utilized for the dispatch day, a resource has the following options to fuel the resource:</p> <ul style="list-style-type: none"> <li>i. procure (a) interruptible transportation services to deliver fuel to the resource at an incremental cost, plus (b) the gas commodity costs; or</li> <li>ii. incur balancing or other fees from its distribution company to consume gas not delivered but supplied by the distribution company.</li> </ul>	<p>Fuel quotes are eligible supporting documentation for a fuel cost change request as per section 5.2.1 of Market Manual 14.2. These supporting materials are required to be submitted with the fuel cost change request via the Online IESO solution at the time that the request is submitted.</p> <p>Market participants are permitted to submit requests for fuel cost changes that include the all-in cost shown in the fuel quote (including transportation, gas commodity and balancing or other fees), however they will net out the service price adder that was registered as part of the registered reference level, if applicable. This net amount will ensure that these fees are not counted twice in a reference level value.</p> <p>Market participants are encouraged to provide specific examples of the types of fuel quotes or information about balancing costs or other fees incurred they will have available when submitting fuel cost change requests to MRP stakeholder engagement for analysis by the market power mitigation team.</p>

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3	MM 14.1 s.14.1 - Alternative Reference Quantity Value	<p>Can the IESO confirm if the costs outlined above are acceptable for a reference level change?</p> <p>Section 5.8 of MM 14.1 outlines a list of acceptable documentation to substantiate a request to use alternative reference quantity value including copies of planned and forced outages and equipment de-ratings.</p> <p>Can the IESO confirm if a resource is expected to re-submit the same planned and forced outages/derate information submitted through the IESO's CROW outage system or will the revised Reference Quantity Value be automatically populated into the IESO Market Power Mitigation process/system?</p>	<p>No, a resource will not be expected to re-submit the same planned and forced outage/derate information. The calculation of reference quantity values will account for outage data from the Control Room Operations Window (CROW) outage system.</p> <p>However, should there be an occasion where relevant outage data impacted the available supply for a resource, but was not integrated into the reference quantity value calculations, that outage data could be submitted after the fact to support a request for an alternate reference quantity value as specified in MM 14.1 s.5.8.</p> <p>For example, outages or derates to a particular facility might indirectly impact the available supply for a resource.</p>
4	December 2022 & January 2023 Engagement Webinars (slide 16 of Market Power Mitigation (Part 2 of 3) presentation - Designated Constrained Areas	<p>Based on the materials provided in the December 2022 &amp; January 2023 Engagement Webinars (slide 16 of the Market Power Mitigation (Part 2 of 3) presentation), it appears that it is possible for a resource to have multiple designation of constrained areas for a single dispatch day.</p> <p>Can the IESO please confirm if this scenario is possible?</p>	<p>It is possible for a resource to be in multiple designated constrained areas for the same dispatch day.</p> <p>Narrow Constrained Areas (NCAs) are designated based on significant positive congestion over an annual study period. Dynamic Constrained Areas (DCAs) are designated on a rolling basis based on assessments of a much shorter, 5-day study period. Because NCAs and DCAs are</p>

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			designated on different bases, it would be possible, for example, that a resource in a large NCA could also be in a smaller DCA within the NCA.
5	MM 5.5 s.2.4.1 and MR Ch.9 s.3.3 - DAM Balancing Credit	<p>Per section 2.4.1 of MM 5.5 and section 3.3 of Chapter 9, the IESO may dispatch a GOG-eligible resource to a quantity less than DA schedule for reliability reasons and a resource would be eligible for a DAM balancing credit settlement amount.</p> <p>Presumably this will be triggered manually by the IESO control room operators. How will the settlement system identify this IESO initiated event?</p>	The IESO will use reasons codes, which will continue to be provided in data files to market participants, to identify this IESO initiated event.

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6	General Comments/Feedback	<p>Settlement Systems: The introduction of the two-settlement system (DAM &amp; RTM) and the Market Power Mitigation process introduces (i) significant volumes of data to be collected/stored, and (ii) an overwhelming amount of complex calculations of settlement charges to implement and reconcile. Atura would like support from the IESO in the Sandbox environment to confirm the</p>	The IESO is committed to working closely with stakeholders during participant testing and training activities. More details on testing timelines and how the IESO will support market participants during testing activities will be shared for feedback in the coming months.

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		settlement charges and ensure the settlement system is developed accurately prior to production.	Participants can begin preparing for testing and training activities now by reviewing the Day-In-The-Life summaries and the Readiness Checklist, as published on the Market Participant Readiness <a href="#">Market Participant Readiness webpage</a> .

## Electricity Distributors Association Feedback and IESO Responses

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
7	MR Ch.6 s.10.3.2 – Revenue Meter Registration	The IESO has not addressed the reason or need for the deletion of ‘Periodic Energy Metering’ section 10.3.2. Please provide an explanation and rationale for deleting this section which references non-dispatchable load facilities. Please provide a description of the impacts to LDCs, if any.	This section of the market rules allows for metering data for legacy metering installations to be collated to 5 or 15 minute intervals. This section is no longer operative as all legacy metering installations have been replaced. The IESO proposes to delete this section as a matter of clean-up.

### Market Rules – Market Settlements, Market Billing and Funds Administration

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
8	MR Ch.9 s.2.14 – Market Remediation	LDCs have several concerns with section 2.1.4 Market Remediation which require IESO attention.  Please see the following:  1) LDCs require greater details with respect to communications from the IESO with	1) Further details on day-ahead market scheduling failures, including the IESO’s notification process will be provided with the release of the proposed market rule and market manual amendments for the Market and System Operations batch.

ID	Section	Feedback	IESO Response
9	MR Ch.9 s.3.1.5a – HPTSA – Real-Time Balancing, Physical Bilateral Contracts	<p>LDCs and the future notification processes that the IESO may undertake in the event of any DAM failures, e.g., how the IESO might communicate and notify the LDCs of a DAM failure, and the actions that are required on the part of LDCs in response.</p> <p>2) We request the IESO provide examples with respect to new hourly physical transaction settlement amount for NDLS in the event of a DAM failure. This should be included as part of a market manual.</p> <p>3) It is unclear to distributors if the IESO will be publishing RTM Ontario zonal prices as part of regular business processes, or only in the event of a DAM failure.</p> <p>We also note that there is a requirement to coordinate with the OEB in the event of a DAM failure – e.g., appropriate accounting practices, guidelines, and settlement procedures during DAM failure events. This will include how LDCs are to communicate events with customers (e.g., replacement of prices on bills, etc.).</p> <p>Please clarify settlement with respect to physical bi-lateral contracts where the location is specific to a non-dispatchable load, specifically, when it is appropriate to <u>exclude</u> the load forecast deviation charges for such settlements.</p>	<p>2) Thank you for your feedback. The IESO will consider including this type of example in future training materials or engagements.</p> <p>3) The IESO will be publishing, as part of regular business processes, real-time market Ontario zonal prices via the new, “Real-Time 5-Minute Ontario Zone Energy Price Report”. The corresponding market rule and market manual amendments detailing this report will be provided with the release of the Market System and Operations batch.</p> <p>The settlement of physical bi-lateral contracts where the location is specific to a non-dispatchable load is based on the day ahead market Ontario zonal price. The load forecast deviation charge is not included in the settlement of such physical bi-lateral contracts.</p>

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10	MR Ch.9 s.3.2.2 – HPTSA – Non-Dispatchable Resources, Non-Dispatchable Loads	<p data-bbox="800 282 1398 451">Please confirm that DAM_LMP<sub>zh</sub> and LFDCh each reflect hourly prices. LDCs would like confirmed if HPTSA_NDL<sub>k,h</sub> is an amount that will be produced, and for each settlement hour.</p> <p data-bbox="800 493 1398 1084">LDCs are seeking additional analysis from the IESO. The IESO should provide details with respect to the expected magnitude of the LFDCh relative to the DAM_LMP<sub>zh</sub> such that the OEB and LDCs can assess the relative impact that this new charge will have and consider appropriate accounting practices (e.g., variance accounts, etc.). To fully quantify the impacts, the IESO should produce the impacts for one of the smallest LDCs and one of the largest LDCs in the province. We are concerned that the magnitude of true-up between these various processes may produce a material impact. Please provide a sample quantification of reasonable materiality between the two processes.</p>	<p data-bbox="1423 282 2003 418">The IESO confirms that DAM_LMP<sub>zh</sub> and LFDCh are hourly values and the HPTSA_NDL<sub>k,h</sub> will be produced for each settlement hour.</p> <p data-bbox="1423 461 2003 734">The IESO is working with the OEB and the LDC community, through the LDC-IESO MRP Preparedness Group, to identify how MRP charge types relate to existing charge types so that appropriate guidance can be provided to LDCs, as well as to better understand their concerns with regard to changes to market settlements.</p>
11	MR Ch.9 s.3.2.4.1 – HPTSA – Non-Dispatchable Resources, Non-Dispatchable Generation, including self-scheduling storage	<p data-bbox="800 1127 1398 1263">We note the addition of NDG settlement is a change from the detailed design phase. Please confirm that HPTSA_NDG<sub>k,h</sub> does not apply to embedded retail generators.</p> <p data-bbox="800 1305 1398 1474">We also note that this is a change from the revised design contemplated for energy storage resource (e.g., self-scheduling storage, with the load side being settled as a PRL). With respect to non-dispatchable</p>	<p data-bbox="1423 1127 2003 1198">The IESO confirms that HPTSA_NDG does not apply to embedded retail generators.</p> <p data-bbox="1423 1240 2003 1474">The IESO provided an overview of the adjustments needed to the storage participation model for MRP at its Quarterly Implementation update in December 2021. While a self-scheduling storage resource will need to participate in the DAM as a price responsive load for its withdrawals of</p>



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		<p>storage, please confirm that the load side will have DAM participation requirements (i.e., as a PRL), while the generator side will not have DAM participation requirements (i.e., self-schedules).</p> <p>We note that consideration of energy storage appears to be an “after thought” in the MRP. Given that the IESO will continue to treat energy storage as two separate resources (e.g., load resource plus generation resource), it is important to ensure that changes impacting loads and generation are also evaluated from the perspective of an energy storage resource.</p>	<p>energy, this requirement can be fulfilled by submitting standing dispatch data, much like self-schedules may be submitted for its injections of energy.</p> <p>Additional information in regards to non-dispatchable storage will form part of the future Market Systems and Operations batch.</p>
12	MR Ch.9. s.4.7.2 – Internal Congestion Rent and Loss Residuals	<p>Please verify and confirm that 'M' refers to the set of all loads except NDLS and that 'M1' is the set of all NDLS. We noted a discrepancy in the formulas between the detailed design phase and these draft market rule amendments.</p> <p>LDCs are seeking additional analysis from the IESO. The IESO should provide details with respect to the expected magnitude of the Internal Congestion Rent and Loss Residuals for one of the smaller LDCs and one of the largest LDCs using real case scenarios. These impacts will assist the OEB and LDCs to assess the relative impact that this new charge will have and consider appropriate accounting practices (e.g., variance accounts, etc.). LDCs are</p>	<p>The IESO confirms that 'M' refers to the set of all loads except NDLS and that 'M1' is the set of all NDLS as specified in sections 4.7.1.2 and 4.7.1.3. The IESO has amended the superscript for the relevant formulas to improve clarity.</p> <p>The IESO is working with the OEB and the LDC community, through the LDC-IESO MRP Preparedness Group, to identify how MRP charge types relate to existing charge types so that appropriate guidance can be provided to LDCs, as well as to better understand their concerns with regard to changes to market settlements.</p>

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		<p>concerned that the magnitude of true-up between these various processes may produce a material impact. Please provide a sample quantification of reasonable materiality between the two processes.</p>	
13	<p>MR Ch.9 s.4.7.3 – Internal Congestion Rent and Loss Residuals</p>	<p>Please verify and confirm that the superscript 'M' refers to the set of all loads (including PRLs). We note a discrepancy in the formulas between the detailed design phase and these draft market rule amendments.</p>	<p>'M' is defined in section 4.7.1.3 and excludes NDLS. The IESO has amended the superscript for the relevant formulas to improve clarity.</p>

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
14	MR Ch.9 s.4.8 – External Congestion Rent and Loss Residuals	<p>External congestion residuals were not contemplated as part of the detailed design phase, and therefore, these formulas are new to LDCs in their review.</p> <p>Currently, we do not note any concern with respect to the formulas. However, we note the merits of additional peer review to ensure there are no errors/corrections required for the formulas. Additional materials supporting these changes (like those prepared during the detailed design phase) are recommended to help stakeholder awareness and knowledge of these changes and their implications.</p> <p>Further, we note that while one congestion rent and loss residual was considered during the detailed design phase, there are now multiple residual line-items to be accounted for in settlement. We request that the IESO provide as much detail as possible with respect to the expected magnitude of these line items relative to other settlement amounts, so that appropriate accounting considerations can be anticipated (e.g., variance accounts, etc.).</p>	<p>Design decisions related to congestion cost residuals were put on hold until the Transmission Rights Market Review engagement was completed. Following the Transmission Rights Market Review engagement, in February 2022, the IESO presented the design for congestion cost residuals, including examples.</p> <p>Due to uncertain market and system conditions impacting congestion and losses, the IESO is unable to produce estimates.</p>

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
15	MR Ch.11, Definitions - Ontario zonal price	More precise language for this definition is required.	The IESO has updated the definition of Ontario Zonal price to clarify.

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		<p>We note that the price that is applicable to non-dispatchable loads (under normal conditions when DAM is functioning), is the DAM Ontario zonal price <b>plus</b> the load forecast deviation charge.</p> <p>Also, we note that the RTM Ontario zonal price will be applicable to NDG resources only (under normal conditions when DAM is functioning).</p> <p>This definition needs to be more prescriptive and illustrative, leaving no room for interpretation across the province.</p>	<p>Non-dispatchable generators are subject to the real-time market locational marginal price and not the Ontario zonal price.</p>

ID	Section	Feedback	IESO Response
16	General Comments/Feedback	<p>The EDA notes that this batch of draft market rule amendments is incomplete and does not include:</p> <ul style="list-style-type: none"> <li>• Market Manual 5: Settlements, Part 5.6: Non-Market Settlement Programs</li> <li>• Market Manual 5: Settlements, Part 5.7: Settlement Process (MRP updates to follow RSS publication)</li> <li>• Market Manual 5: Settlements, Part 5.8: Settlement Invoicing (MRP updates to follow RSS publication)</li> <li>• Market Manual 5: Settlements, Part 5.10: Settlement Disagreements (MRP updates to follow RSS publication)</li> </ul>	<p>The IESO will release the specified market manuals as part of the Market and System Operations batch of market rules and market manuals in July 2023. We do not anticipate any meaningful changes to those manuals that would detract from engaging with the materials that have already been posted.</p> <p>The IESO continues to work proactively with LDCs and OEB staff to ensure that the Board is able to assess changes that may be needed to its codes and standards. To facilitate these discussions, the IESO invites the EDA to come forward with the specific</p>

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		<ul style="list-style-type: none"> <li>• IESO Charge Types and Equations</li> </ul> <p>The delay of these materials, particularly charge types and equations, could pose a significant issue for MRP implementation, as LDCs and the Ontario Energy Board do not have the required information to detail changes to wholesale market accounting, settlement, invoicing and customer billing. Moreover, the IESO currently does not have a schedule for when this information would be published.</p> <p>LDCs require instructional information, as contemplated by these Market Manuals, to ensure that wholesale market settlement systems as well as customer invoicing/billing, and accounting practices are updated in time for the planned launch of MRP. We further note that a detailed review of regulatory instruments (e.g., OEB costs, accounting guidance, etc.) cannot proceed until the full package of planned changes are released for review.</p> <p>LDCs continue to require the following information related to MRP implementation:</p> <ul style="list-style-type: none"> <li>• Scope, timelines, process to decide on: <ul style="list-style-type: none"> <li>○ enabling legislative amendments; and</li> <li>○ amendments to regulatory policy (e.g., the mechanics of the Regulated Price Plan (RPP)) and regulatory instruments (e.g., OEB codes including Retail Settlement</li> </ul> </li> </ul>	<p>sections of OEB codes and standards that it expects will need to change.</p> <p>Additional information in regards to publishing and reporting of new information will form part of the future Market Systems and Operations batch.</p> <p>Clarity with respect to the 'transition period' will form part of the future final alignment batch.</p>

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		<p>Code (RSC), Standard Supply Service Code (SSSC), accounting practices, etc.)</p> <ul style="list-style-type: none"> <li>• Publishing and reporting of new information (e.g., DAM &amp; RTM prices, LFDCs, CRLRs, etc.)</li> <li>• Communications with customers, particularly non-RPP customers, as HOEP will be replaced with new wholesale market price (i.e., impacts on LDCs' customer bill is still uncertain)</li> <li>• Communication with embedded retail generators as HOEP will be replaced by new wholesale market price (i.e., impacts to non-market participant generation is still uncertain), including new LDC settlement of embedded generation with IESO contracts.</li> <li>• Clarity with respect to "transition period" from existing market to future market</li> </ul>	

## Ontario Power Generation Feedback and IESO Responses

ID	Section	Feedback	IESO Response
18	MR Ch.6 - General	<ol style="list-style-type: none"> <li>1) There is inconsistency with the section reference format used, i.e., "ss.x" vs "s.x" in the Market Rules chapters. OPG recommends alignment to one reference format for Market Rules Chapters 6 to 9.</li> <li>2) The section reference format within this chapter is not consistent with reference</li> </ol>	<p>We have corrected all inconsistencies in the reference format used for Market Rules chapters. For reference, please find below the convention that the IESO will be following:</p>

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		<p>format of s.x/ss.x, e.g., “section 2.1.5” in Section 2.1.1. OPG recommends updating throughout chapter for alignment.</p>	<table border="1"> <thead> <tr> <th data-bbox="1402 272 1711 316">Reference to:</th> <th data-bbox="1717 272 2001 316">Convention</th> </tr> </thead> <tbody> <tr> <td data-bbox="1402 321 1711 386">Single chapter, single section</td> <td data-bbox="1717 321 2001 386">MR Ch.8 s.3.4</td> </tr> <tr> <td data-bbox="1402 391 1711 495">Single chapter, multiple consecutive sections</td> <td data-bbox="1717 391 2001 495">MR Ch.1 ss.1.1-1.6 MR Ch.7 ss.22.2 – 22.4</td> </tr> <tr> <td data-bbox="1402 500 1711 706">Single chapter, multiple non-consecutive sections</td> <td data-bbox="1717 500 2001 706">MR Ch.5 ss.2.3 and 5.7 MR Ch.7 ss.22.1.3, 22.5.2, 22.6.3, 22.6.5 and 22.19.3</td> </tr> <tr> <td data-bbox="1402 711 1711 815">Single chapter, multiple optional sections</td> <td data-bbox="1717 711 2001 815">MR Ch.8 s.3.4.2 or 3.4.3</td> </tr> <tr> <td data-bbox="1402 820 1711 961">Multiple chapters</td> <td data-bbox="1717 820 2001 961">MR Ch.6 s.10.4 and MR Ch.10 s.6C MR Ch.4 and MR Ch.5</td> </tr> <tr> <td data-bbox="1402 966 1711 1031">Appendix of a specific chapter</td> <td data-bbox="1717 966 2001 1031">MR Ch.9 App.9.2 s.10</td> </tr> <tr> <td data-bbox="1402 1036 1711 1177">Cross-reference to a section within the same document/chapter</td> <td data-bbox="1717 1036 2001 1177">section 3.10.2</td> </tr> </tbody> </table>	Reference to:	Convention	Single chapter, single section	MR Ch.8 s.3.4	Single chapter, multiple consecutive sections	MR Ch.1 ss.1.1-1.6 MR Ch.7 ss.22.2 – 22.4	Single chapter, multiple non-consecutive sections	MR Ch.5 ss.2.3 and 5.7 MR Ch.7 ss.22.1.3, 22.5.2, 22.6.3, 22.6.5 and 22.19.3	Single chapter, multiple optional sections	MR Ch.8 s.3.4.2 or 3.4.3	Multiple chapters	MR Ch.6 s.10.4 and MR Ch.10 s.6C MR Ch.4 and MR Ch.5	Appendix of a specific chapter	MR Ch.9 App.9.2 s.10	Cross-reference to a section within the same document/chapter	section 3.10.2
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Cross-reference to a section within the same document/chapter	section 3.10.2																		
19	MR Ch.6 s.10.3.2, 1.1A.1.5, 1.5.1.5	<p>OPG recommends aligning the replacement text within the three deleted sections, and with the text in Sections 10.3.2.1 and 10.3.2.2:</p> <ol style="list-style-type: none"> <li>1) Section 10.3.2 has been replaced with “[Section deleted – intentionally left blank]”.</li> </ol>	<p>This section has been amended to incorporate this feedback.</p>																

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		2) Sections 1.1A.1.5 and 1.5.1.5 have been replaced with “[Intentionally left blank – section deleted]”.	
20	MR Ch.6 s.1.5.1.4	OPG recommends removing the reference to Section 1.5.1.5, as it is a deleted section.	This section has been amended to incorporate this feedback.

Market Rules – Hydroelectric Resources – Optional Registration Requirements

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
21	MR Ch.7 s.2.2.6A.5, MM 1.5 s.3.2.5	<p>Market Manual 1.5 Section 3.3.2.5 indicates that a Market Participant (MP) is required to submit a time lag for each adjacent downstream linked forebay in a cascade group. The IESO will calculate the remaining time lag values for all other linked forebays.</p> <p>Considering the above requirement, an MP would be required to submit one time lag per forebay (time lag between a forebay and the adjacent downstream forebay in the cascade), rather than multiple time lags per forebay (time lag between a forebay and any subsequent downstream forebays in the cascade), as the remaining time lags would be calculated by the IESO.</p> <p>Please clarify if the above interpretation is correct and revise Section 2.2.6A.5 if required.</p>	This interpretation is correct. This section has been amended to incorporate this feedback.



<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
22	MR Ch.8 - General	The Market Rules section reference format in this chapter is not consistent with reference format of s.x/ss.x, e.g., "section 2.1.23.1" in Section 2.1.3.1. OPG recommends updating throughout chapter for alignment.	We have corrected all inconsistencies in the reference format used for Market Rules chapters. For details on the convention that the IESO is following, please refer to the IESO response for comment ID: 18.
23	MR Ch.8 s.2.1.2	<p>This section mentioned offering a service where selling MP for a physical bilateral contract can assume responsibility for the buying MP's settlement obligations other than energy.</p> <p>OPG interprets that to mean the selling MP can allocate uplifts from the area.</p> <p>Is this correct? If not, please provide the correct interpretation.</p>	This provision is not new; it was moved from section 3.1.7 of Chapter 9 to Chapter 8. OPG's interpretation is correct.
24	MR Ch.8 s.3.4.2 (previously Section 4.4.2)	What is the rationale for the deletion of Section 4.4.2.1? This section had allowed a calculation for the transmission transfer capability based on the original Section 4.4.1 (now Section 3.4.1), and sets all IESO payments to zero under the new Section 3.4.2.	<p>Currently, a transmission transfer capability reduction to zero can occur partway through an hour, and the rules allow for TR payments for such hour before the payments are reduced to zero.</p> <p>Under MRP, a reduction of the transmission transfer capability to zero in the day-ahead market will occur for the entire hour and therefore the current section 4.4.2.1 is no longer required.</p>

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
25	MR Ch.8 s.3.8.6	The format for the Market Rules chapter references in the subsections is not consistent with the format of MR Ch.x.	We have corrected all inconsistencies in the reference format used for Market Rules chapters. For details on the convention that the IESO is following, please refer to the IESO response for comment ID: 18.
26	MR Ch.8 s.3.12	“Market commencement date” has been replaced with “MRP commencement date”. “MRP commencement date” is not italicized, and therefore not a defined term. Is there a location within the Market Rules and/or Market Manuals where the date for Market Renewal Program (MRP) commencement is specified?	The IESO intends to define this term as part of the final alignment batch of market rule amendments.
27	MR Ch.8 s.3.12.1.1	The format for the Market Rules chapter references in the section is not consistent with the format of MR Ch.x App.x.	We have corrected all inconsistencies in the reference format used for Market Rules chapters. For details on the convention that the IESO is following, please refer to the IESO response for comment ID: 18.
28	MR Ch.8 s.3.16.3	Suggest italicizing “business day”.	This section has been amended to incorporate this feedback.
29	MR Ch.8 s.3.18.1	The format for the Market Rules section references in the subsections is not consistent with format of s.x used in Section 3.18.1.1.	References to sections within the same document/chapter use the “section X.X” format. No changes are required.
30	MR Ch.8 s.3.20.4	OPG recommends renumbering the subsections from “3.20.2.x” to “3.20.4.x” to align with the revision in the section numbering.	This section has been amended to incorporate this feedback.

ID	Section	Feedback	IESO Response
31	MR Ch.9 - General	<ol style="list-style-type: none"> <li>1) The section reference format within this chapter is not consistent with reference format of s.x/ss.x, e.g., "section 2.1.1A2" in Section 2.1.1. Suggest updating throughout chapter for alignment.</li> <li>2) There is inconsistency with the section reference format used, i.e., "s.x" vs "ss.x". Suggest alignment to the same section reference format.</li> <li>3) There is a comma between "MR Ch.x, s.x" within some sections, which is inconsistent with the set reference formatting for Market Rule chapter and section, i.e., "MR Ch.x s.x".</li> </ol>	<p>We have corrected all inconsistencies in the reference format used for Market Rules chapters. For details on the convention that the IESO will be following, please refer to the IESO response for comment ID: 18.</p>
32	MR Ch.9 s.4.4 and 4.5	<p>Section 4.5 outlines the Day-Ahead Market (DAM) Generator Offer Guarantee (GOG) settlement process and does not include consideration for reliability commitment.</p> <p>Section 4.5 outlines the Real-Time (RT) GOG settlement process and does include consideration for reliability commitment.</p> <p>The definition for reliability commitment in Chapter 11 indicates that the commitment process is a manual constraint determined by the IESO.</p> <p>Is it correct to assume that there is requirement for manual constraints in the</p>	<p>Both DAM and RT operators may be required to respond to developing reliability concerns in their applicable timeframes and apply reliability commitment constraint to GOG eligible resources.</p> <p>The DAM-GOG settlement process does not differentiate between a reliability commitment and an operational commitment as the calculations are the same. In contrast, the RT-GOG process needs to consider advancements and extensions that are adjacent to a reliability commitment and which will be calculated as separate commitments.</p>

ID	Section	Feedback	IESO Response
33	MR Ch.9 s.4.4.1.1.c and 4.5.5.c	<p>DAM, but there could be requirement for manual constraints in the RT? Hence, the RT GOG settlement process could contain a reliability commitment component, while it is excluded from the DAM GOG settlement process?</p>	<p>A resource would receive a DAM-GOG if the extended pre-dispatch operational commitment overlaps with a DAM schedule, otherwise it would receive RT-GOG.</p>
		<p>Section 4.4.1.1.c: "<i>day-ahead commitment period</i> is the set of contiguous <i>settlement hours</i> with <i>day-ahead schedules</i> from the start of <i>minimum generation block run-time</i> to the end of the <i>day-ahead operational commitment</i> or <i>extended pre-dispatch operational commitment</i>, as applicable."</p>	
		<p>Section 4.5.5.c: "If a <i>GOG-eligible resource</i> not associated with a pseudo-unit: such <i>pre-dispatch operational commitment</i> immediately follows a <i>day-ahead market operational commitment</i> or <i>reliability commitment</i>,"</p>	
		<p>Section 4.4.1.1 outlines the provision to qualify the PD extension for a Day-Ahead Market (DAM) Generator Offer Guarantee (GOG); however, 4.5.5 shows that PD extension qualifies for Real-Time (RT) GOG under Variant #3 formulation.</p>	
		<p>Please clarify if the pre-dispatch (PD) extension commitment indicated above would receive a DAM-GOG or a RT-GOG.</p>	

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
34	MR Ch.9 s.4.5.3, 4.5.4 and 4.5.5	Can the IESO please clarify what defines Variant #2 and Variant #3 in calculating the RT GOG for non-pseudo units?	The IESO has amended the section to correct the description of variant #3.
35	MR Ch.9 s.4.5.4 and 4.5.5	<p>The Section 4.5.4 description for Variant #2 is identical to Section 4.5.5.a description for Variant #3. Section 4.5.5.b refers to a day-ahead operational schedule in the RT-GOG.</p> <p>Please clarify what defines Variant #2 and Variant #3 in calculating the RT-GOG for non-pseudo units.</p>	The IESO has amended the section to correct the description of variant #3.
36	MR Ch.9 s.4.6	<p>OPG recommends the IESO to provide a clearer definition of what is the 'Ramp-Down' period in Chapter 9 Section 4.6, with consideration given to resource injection, ramping direction and ramp rates. See comment for Market Manual 5.5 Section 2.23.</p> <p>This feedback is related to previous Market Manual 5.5 Section 2.23 feedback: For a non-quick start (NQS), non-pseudo unit that is ramping down at below the Minimum Load Point (MLP) and is not following RDRL for the time period below MLP, will it be eligible for Ramp-Down Settlement amount for the entire ramp down period? Please confirm that the resource is not eligible for RT-GOG and RT Make Whole Payment (MWP) in the ramp-down period.</p>	<p>The applicable ramp-down period is captured in the definition of 'T' and the relevant sections have been amended to incorporate this feedback.</p> <p>The ramp-down settlement amount (RDSA) payment only applies to hours that are scheduled below MLP.</p> <p>The resource is not eligible for RT MWP or RT GOG during the ramp down period.</p>

ID	Section	Feedback	IESO Response
37	MR Ch.9 s.6.3.18	<p>This section states: After a recalculated settlement statement referred to in section 6.3.17 is issued, other than in respect of a final recalculated settlement statement, each market participant shall have six business days in which to notify the IESO of errors or omissions in the recalculated settlement statement in accordance with section 6.8.</p> <p>The Recalculated Settlement Statement (RCSS) will be issued on the same day by month by version. It is possible for MPs to receive a high volume of RCSS statements on the same day. Based on the Physical Resettlement Calendar released by the IESO in anticipation of an in-service date of November 1, 2023 for Replacement of the IESO Settlement System (RSS), on December 15, 2024, the IESO could issue up to 210 statements from past trade dates within the two year period, i.e., all the different versions of RCSS-1 to RCSS-Final statements for past seven trade months. It would be very extremely challenging for MPs to review and process such a high volume of RCSS statements within six business days.</p> <p>OPG proposes to extend to 20 business days for RCSS Notice of Dispute (NOD) process.</p>	<p>There is insufficient time to implement a change to the notice of disagreement timeline in advance of the May 1, 2023 RSS commencement date. The IESO will consider the proposal for an increased notice of disagreement timeline as part of possible future enhancements.</p>
38	MR Ch.9 s.6.8.12	<p>This section outlines various scenarios where Notice of Disagreement (NOD) cannot</p>	<p>Subsequent to the completion of an independent process review, if there is a disagreement, it would progress directly to</p>

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		<p>be submitted (e.g., if the submission deadline passed).</p> <p>Section 6.8.12.10 references Market Rules Chapter 7 Section 22.8 for the explanation that no NOD will be accepted subject to the independent review process. In this case, would the NOD be open again once the Independent Review Process is completed? During the Independent Review process, would the settlement be calculated based on the as-registered reference levels?</p>	<p>the dispute resolution process outlined in MR. Ch. 3.</p> <p>The IESO will use registered reference level values for the settlement process. The IESO will not register a value that is subject to an independent review process until such process is complete.</p>

39	MR Ch.9 s.6.16.5.1.b	Should the reference to Chapter 8 Section 3.19.6 be Chapter 8 Section 3.19.7?	This section has been amended to incorporate this feedback.
40	MR Ch.9 s.4.10	<p>For an NQS non-pseudo-unit resource generator failure where <math>AQEI=0</math>, if <math>PD\_QSI=DAM\_QSI</math> then <math>GFC\_MPC=0</math>.</p> <p>Does the above imply that there is no <math>GFC\_MPC</math> charge if the resource's DAM schedule is equal to the PD schedule, based on the formula provided?</p>	A resource will not incur a generator failure charge for hours that in which it received a DAM schedule as the resource will be required under the two-settlement process to 'buy-back' the MWhs that were not injected.

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
41	MR Ch.9, Appendices - General	The section reference format within this chapter is not consistent with reference format of s.x/ss.x, e.g., "section 2.4" in Section 1.3.2. Suggest updating throughout chapter for alignment.	We have corrected all inconsistencies in the reference format used for Market Rules chapters. For details on the convention that the IESO will be following, please refer to the IESO response for comment ID: 18.

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
42	MR Ch.11, Definitions - General	<p>There is an extra space in some instances of Market Rules chapter and section references within the definitions, i.e., "s. x" and "Ch. x".</p> <p>Please ensure alignment of the section references between the Market Rules and Market Manuals, i.e., "s.x" vs "ss.x".</p>	We have corrected all inconsistencies in the reference format used for Market Rules chapters. For details on the convention that the IESO will be following, please refer to the IESO response for comment ID: 18.
43	MR Ch.11, Definitions: Advanced Pre-Dispatch Operational Commitment, Day-Ahead Operational Commitment, Day-Ahead Operational Commitment, standalone pre-dispatch operational commitment	OPG is unable to locate Chapter 7 Sections 5B.2.2.1, 4B.2.2.2, 5B.2.2.2 and 5B.2.2.5 referenced in the definitions.	Chapter 7 is part of the market rules and manuals that are currently being drafted as part of the future Market Systems and Operations batch. These sections will be available when the market manuals and market rules for Market System and Operations batch are published.
44	MR Ch.11, Definitions - Cascade group	<p>"Cascade group means one or more forebays in a cascade river system ..."</p> <p>Can the IESO please provide clarity on why a cascade group could be composed of more than two forebays.</p>	The number of forebays in a cascade group is based on the market participant's infrastructure on that cascade river system.



<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
45	MR Ch.11, Definitions - Start-Up Notice	Chapter 7 Section 10.1 has been left blank in the Consolidated Batch.  Recommend revising the reference used for this definition.	Chapter 7 is part of the market rules and manuals that are currently being drafted as part of the future Market Systems and Operations batch. These sections will be available when the market manuals and market rules for Market System and Operations batch are published.
46	MR Ch.11, Definitions - Time Lag	In Market Manual 1.5 Section 3.3.2.5, the definition of time lag uses the term "forebay" instead of "hydroelectric generation facility".  OPG recommends alignment of terms used within the time lag definition between Chapter 11 (from Consolidated Batch) and Market Manual 1.5.	This content was aligned through the republication of MM 1.5 with the Settlement batch content.

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
47	MM 1.5 - Conventions	There appears to be a double space between ' and ( in the sentences in the red-lined version of the draft Market Manual 1.5: <ol style="list-style-type: none"> <li>1. "...representative format: 'MR Ch.1 ss.1.1-1.2' (i.e. market..."</li> <li>2. "...representative format: 'MM1.5 ss.1.1-1.2' (i.e. market..."</li> </ol>	This section has been amended to incorporate this feedback.
48	MM 1.5, s. 2.2.1, Table 2-2	There is a new paragraph under Ontario Energy Board Licence section that provides exemption to the OEB licence requirement.	These requirements were inadvertently removed during a reorganization of Market Manual 1.5. We have reintroduced the OEB

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		Is this exemption solely reference to the Capacity Auction process? Does this exemption apply to other areas of market participation?	license requirements into Table 2-2. Certain market participant types do not require an OEB license in relation to activities those classes of market participant are authorized to perform.
49	MM 1.5, s. 2.2.4	The RAN acronym is not defined in its first mention in the market manual.	The RAN acronym has been defined in section 1.3.2 in the Roles and Responsibilities section.
50	MM 1.5, s. 3.3.2	“This section applies to dispatchable hydroelectric generation resources with a primary fuel type of Water.” OPG recommends either removing “hydroelectric” or “with a primary fuel type of Water” from the above sentence.	This section has been amended to incorporate this feedback.
51	MM 1.5, s. 3.3.2.4	<p>There are two restrictions for the registration of a dispatchable hydroelectric generation resource on the same forebay:</p> <ul style="list-style-type: none"> <li>• all resources registered on a forebay must have the same registered market participant; and</li> <li>• all resources registered on each forebay within a cascade group must have the same owner.</li> </ul> <p>1) What is the rationale for the different organization relationship requirement in the restrictions above, i.e., the same owner vs the same registered market</p>	<p>1) The rationale for the same registered market participant is to ensure it is the same party whom submits the requisite dispatch data since some dispatch data will be at the forebay level. Further information will form part of the future Market Systems and Operations batch.</p> <p>2) Since third parties can be hired to serve the role of registered market participants, failing to have an ownership requirement would have market power implications and the ownership requirement was established to mitigate such issues.</p>

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		<p>participant? This difference will disqualify cascade resources from sharing a forebay if the resources have different owners but have the same registered market participant.</p> <p>2) OPG recommends the organization relationship requirement be aligned for the two restrictions, with the requirement to be having the same registered market participant. This would avoid inadvertently disqualify qualifying resources from sharing the same forebay.</p> <p>3) OPG recommends revising associated definitions, e.g., forebay, if required to address any changes above.</p>	<p>3) The IESO is considering the ownership requirement further to ensure this does not unduly limit participants.</p>
52	MM 1.5, s. 3.3.2.5	<p>The term “linked resources” has been revised to “linked forebay”. Is there any impact to the Market Power Mitigation reference levels due to this change? The Storage Horizon Opportunity Cost is calculated based on resources, not the forebay which could include multiple resources.</p>	<p>The current approach for MM 14.2 appropriately refers to resources that share a forebay in a manner consistent with the updated content in MM 1.5 and no changes are required. For more information on how the Storage Horizon Opportunity Cost is calculated for linked forebays/cascade groups, please refer to MM 14.2: Reference Levels and Reference Quantities.</p>
53	MM 1.5, s. 3.3.4.2	<p>The acronym MLP has been previously defined in Section 3.3.3.3, suggest to remove “minimum loading point” from the first sentence of Section 3.3.4.2 and replace with the MLP acronym.</p>	<p>All instances of MLP, except for those that appear in an equation, have been updated to use the expanded term. This aligns with the approach that being used for defined terms in all manuals in the ongoing batches.</p>

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
54	MM 1.5, s. 3.3.5	The reference in this section is revised to Market Rules Chapter 7 Section 2.2.22, but this section (in the Consolidated Draft) references a transitional scheduling generator. The original reference to Market Rules Chapter 7 Section 2.2.27 is more appropriate, as it references eligibility for generator offer guarantee.	MR Ch.7 is one of the market rules chapters that are currently being drafted as part of the future Market Systems and Operations batch. These sections will be available when the market manuals and market rules for Market System and Operations batch are published.
55	MM 1.5, s. 3.6.1	OPG suggests a space between in the highlighted term "...generation resources or dispatchable non-quick star generation facilities..."	This manual has been updated to incorporate this feedback.
56	MM 1.5, List of Acronyms	Editorial suggestions: 1) CAA is only used once in the market manual, suggest removal from this list; 2) Suggest including NERC in the list.	This manual has been updated to incorporate this feedback.
57	MM 1.5 - General	1) There is inconsistency with the use of "ss.x" and "s.x" in the market rules and market manuals references in Market Manuals 1.5, 4.4, 5.3 and 5.5, i.e., mixed use of "ss" and "s" within the documents. OPG suggests convention alignment for the four market manuals for consistency.  2) Market Manuals 1.5 and 5.5 have a "Conventions" section, while Market Manuals 4.4 and 5.3 have a "Market Manual Conventions" section. Suggest alignment for consistency.	We have corrected all inconsistencies in the reference format used for Market Rules chapters. For details on the convention that the IESO will be following, please refer to the IESO response for comment ID: 18.

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
58	MM 4.4 - Document Change History	Issue 22.0 dated September 15, 2021 is revised to Issue 61.0. Should the revision be referencing Issue 21.1, in alignment with Baseline 46.0?	This section has been amended to reference Issue 21.1, in alignment with Baseline 46.0.
59	MM 4.4 - Conventions	There appears to be a double space between ' and ( in the sentences in the red-lined version of the draft Market Manual 4.4: 1) "...representative format: 'MR Ch.1 ss.1.1-1.2' (i.e. market..." 2) "...representative format: 'MM1.5 ss.1.1-1.2' (i.e. market..."	This section has been amended to incorporate this feedback.
60	MM 4.4 – Conventions	OPG suggests replacement of "in" with "and" in: "Terms and acronyms used in this market manual in its appended documents..."	This section has been amended to incorporate this feedback.
61	MM 4.4, s. 1.2	The underscore symbol is used in the market manual title, is this intentional? "...MM 5.8: Settlement Invoicing."  The settlement of payments related to TR auction is addressed in Market Manual 5.8. This can result in significant changes to the TR auction settlement process. 1) Has this change been previously communicated and/or stakeholdered with market participants?  2) If there are changes to the TR settlement process with the move	No the underscore is not intentional and has been removed.  MM 5.8 is one of the manuals that are currently being drafted as part of the future Market Systems and Operations batch. There are not anticipated to be any significant changes to MM 5.8 and any updates would be alignment in nature (e.g. utilizing new defined terms).

ID	Section	Feedback	IESO Response
		<p>from Market Manual 5.7 to Market Manual 5.8, when would the revised Market Manual 5.8 be available for stakeholder review?</p> <p>3) Market Manual 5.8 is currently titled "Financial Market Settlement Invoicing", but is listed as "Settlement_Invoicing" in the section. Please revise for alignment.</p>	
62	MM 4.4 s. 1.2 and 4.2	<p>1) The Market Manual 5.5 title within the two sections ("Settlement Amounts Associated with the IESO Administered Markets") does not match the Market Manual 5.5 title in the Market Settlements, Metering and Billing Batch release ("IESO-Administered Markets Settlement Amounts").</p> <p>2) For Section 4.2, the reference to Market Manual 5.5 is missing in "...the physical markets settlement statement process detailed in Settlement Amounts Associated with the IESO-Administered Markets." The market manual title is bolded, which is inconsistent with the formatting of the market manual titles in other sections.</p> <p>3) In the Summary of Changes to Market Manual 4.4 Section 4.2, there is mention of obsolescence of Market Manual 5.5 and its content be</p>	<p>For comments 1) and 2), these sections have been amended to incorporate this feedback.</p> <p>For comment 3), the Summary of Changes to Market Manual 4.4 section 4.2 incorrectly indicated that Market Manual 5.5. would be obsoleted, with new Market Manual 5.11 created. Please disregard the previous entry in the Summary of Changes to Market Manual 4.4 section 4.2.</p>

ID	Section	Feedback	IESO Response
		<p>restructured to a new Market Manual 5.11. When is this update being implemented? Market Manual 4.4 from the December 2022 Market Settlements, Metering and Billing Batch makes references Market Manual 5.5, not Market Manual 5.11. OPG recommends revising Market Manual 4.4 in anticipation of this change for alignment.</p>	
63	MM 4.4, s. 3.0	<p>Should the reference below be MR Ch.8 s.3.11.7?</p> <ul style="list-style-type: none"> <li>• "...allocated to the first round (MR Ch.8 s.3.11.9)."</li> </ul>	<p>Yes, it should and this reference has been amended accordingly.</p>
64	MM 4.4, s. 4.0	<p>The section refers to a new Market Manual 5.8, which is resultant from the merging of the current Market Manuals 5.7 and 5.8. Market participants would not be able to determine the appropriateness of the revision in Section 4.0 if the new Market Manual 5.8 is not available for review. When would the new Market Manual 5.8 be available for stakeholder review?</p>	<p>MM 5.8 is one of the manuals that are currently being drafted as part of the future Market Systems and Operations batch. There are not anticipated to be any significant changes to MM 5.8 and any updates would be alignment in nature (e.g. utilizing new defined terms).</p>
65	MM 4.4 Appendix B	<p>OPG suggests that multiple market rules references to reside within a single set of brackets for format alignment with other sections in the market manual, e.g.:</p> <ul style="list-style-type: none"> <li>• (MR Ch.8 s.3.7.2)(MR Ch.8 s3.12.1.5) to (MR Ch.8 ss.3.7.2 and 3.12.1.5).</li> </ul>	<p>This section has been amended to incorporate this feedback.</p> <p>The market rules reference to Chapter 7, section 4.B.1 – publication of the DAM Hourly Intertie Energy Price Report is to a new, proposed market rule as part of the future Market System and Operations batch.</p>

ID	Section	Feedback	IESO Response
		<p>There is reference to Market Rules Chapter 7 Section 4.B.1. OPG is unable to locate this section in the MRP Consolidated Draft.</p>	
66	MM 4.4 Appendix E	<p>OPG suggests to include specific references mentioned in the section body in the reference section, and delete sections that are not mentioned:</p> <ul style="list-style-type: none"> <li>• (MR Ch.8 ss.3.16.1.1 – 3.16.1.4 and 3.16.3.1 – 3.16.3.4) vs (MR Ch.8 s.3.16.1 and MR Ch.8 s.3.16.3).</li> </ul>	<p>This section has been amended to incorporate this feedback.</p>
67	MM 4.4 Appendix G, Table G-1	<p>Editorial suggestions for descriptions: "...MR Ch8. Ss3.8.1.For all amounts...":</p> <ul style="list-style-type: none"> <li>• "Ch8." to "Ch.8";</li> <li>• "1.For" to "1. For".</li> </ul> <p>1) The "TR Payout Process" refers to Market Rules Chapter 8 Section 3.8.1, but Section 3.8.1 outlines the rules for TR participation, not a payout process. Please confirm if Section 3.8.1 is the appropriate reference.</p> <p>2) There is reference to Market Manual 4.6: Market Remediation.</p> <ul style="list-style-type: none"> <li>• Is this a new Market Manual? The current Market Manual 4.6 is titled "Real-Time Generation Cost Guarantee Program".</li> <li>• If this is a new Market Manual, when would it be available for stakeholder review?</li> </ul>	<p>This section has been amended to incorporate this feedback.</p> <p>In regards to MM 4.6, the current MM 4.6 is being retired and market remediation content will be incorporated into MM 4.2: Operation of Day-Ahead Market, MM 4.3: Real-Time Scheduling of the Physical Markets and MM 4.5: Market Suspension &amp; Resumption. This section has been amended to refer to the correct market manual.</p>



<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
		3) What is the treatment for the current Market Manual 4.6 "Real-Time Generation Cost Guarantee Program"?	
68	MM 4.4 List of Acronyms	Editorial suggestions: 1) LMP is not used in the market manual, suggest deleting from the list; 2) TTC is only used once in the market manual, suggest deleting from the list.	This section has been amended to incorporate this feedback.

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
69	MM 5.3 Table of Changes	1) Suggest adding in punctuation after: <ul style="list-style-type: none"> <li>• "Market Settlements &amp; Metering"</li> <li>• "Market Billing and Funds Administration"</li> </ul> 2) What is "Document name change" in reference to? 3) There is reference to the "Market Settlements & Metering" Detailed Design document, however, the detailed design document is titled "Market Settlement". Recommend revising for alignment.	1) This section has been amended to incorporate this feedback. 2) The document was previously named 'Submission of Physical Bilateral Contract Data' and now the document is titled 'Physical Bilateral Contract Data'. 3) 3. This section has been amended to incorporate this feedback.
70	MM 5.3 s.1.2	OPG suggests listing the market rules sections in numeric order and include section headings for clarity.	This section has been amended to incorporate this feedback.

ID	Section	Feedback	IESO Response
71	MM 5.3 s.1.4	When would Market Manual 5.10 be available for stakeholder review?	MM 5.10 is one of the manuals that are currently being drafted as part of the future Market Systems and Operations batch. There are not anticipated to be any significant changes to MM 5.10 and any updates would be alignment in nature (e.g. utilizing new defined terms).
72	MM 5.3 s.2.2	<p>“...one of the above two forms...” in the last sentence implies an “OR” condition. However, the two bullet points above the last sentence is connected by “and”, which implies “AND” condition. The bullet points are also prefaced by “The derived quantity of energy option:”, where the option is singular. Can the IESO please clarify the implication of the “OR” condition in the last sentence?</p>	This section has been amended to incorporate this feedback.
73	MM 5.3 s.5.0	<p>There is reference to Market Manual 5.7 in this section. The Summary of Change “Market Manuals – Settlements” section (page 25) indicates that there will be a future release of Market Manual 5.7. However, the description for Market Manual 4.4 Section 4 indicated that Market Manual 5.7 will be superseded by a new Market Manual 5.8, which is resultant from the combination of the current Market Manual 5.7 and 5.8.</p> <p>1) Please clarify the status of Market Manual 5.7.</p>	MM 5.7 is one of the manuals that are currently being drafted as part of the future Market Systems and Operations batch. There are not anticipated to be any significant changes to MM 5.7 and any updates would be alignment in nature (e.g. utilizing new defined terms).

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
		2) Should the reference in this section be to Market Manual 5.8 instead of Market Manual 5.7?	
74	MM 5.3 List of Acronyms	The two acronyms in this list are not used in the market manual, this section can be deleted.	This section had been included because the acronyms were used in Figure 3-1. We have now replaced the previous figure with a new one that spells out PBC and PBCD. The List of Acronyms table has now been deleted.
75	MM 5.3 - General	<p>1) The Summary of Change indicated that procedural workflows and steps have been removed and replaced with the applicable training guide. It is important to ensure the hyperlinks within the market manual remain active so that market participants can easily access the required information.</p> <p>2) The roles and responsibilities section has been removed. Is there another location (within the Market Rules or Market Manuals) where this information is conveyed?</p>	Thank you for your comment. In regards to the roles and responsibilities, and consistent with the approach for other manuals, they have been removed as the roles of the parties are adequately outlined in the rules and manual.

<b>ID</b>	<b>Section</b>	<b>Feedback</b>	<b>IESO Response</b>
76	MM 5.5 – General	There was removal of certain charge types in this draft version Market Manual 5.5, such as Global Adjustment and Regulated Embedded Generation. From	Settlement amounts provided for in applicable law will be captured in MM 5.6, which is one of the manuals that are currently being drafted as part of the future

ID	Section	Feedback	IESO Response
		<p>the "Summary of Change" document, the removed Market Manual 5.5 Section 1.6.6 Transmission Service Charges for Embedded Generation will be moved to Market Manual 5.6. This is also applicable for Section 1.6.7. The "Summary of Change" did not mention the removal of Section 1.4.6.8 Global Adjustment.</p> <ol style="list-style-type: none"> <li>1) Please provide the release date of the revised Market Manual 5.6 for review.</li> <li>2) Where can market participants find the replacement for the removed Section 1.4.6.8?</li> </ol>	<p>Market Systems and Operations batch. There are not anticipated to be any significant changes to MM 5.6 relative to the same content currently in MM 5.5 and any updates would be alignment in nature (e.g. utilizing new defined terms).</p>
77	MM 5.5 s.1.2	<p>OPG suggests alignment for market rules reference format ("ss.x" vs "s.x") and the use of sections headings for all Market Rules sections in the list.</p>	<p>We have corrected all inconsistencies in the reference format used for Market Rules chapters. For details on the convention that the IESO will be following, please refer to the IESO response for comment ID: 18.</p> <p>Regarding section headings for market rule references, we have added them only where the reference is to a section that has a heading in the market rules.</p>
78	MM 5.5 s.2.0	<p>Editorial suggestions within this section:</p> <ol style="list-style-type: none"> <li>1) Italicize defined term in "Day-ahead market settlement includes settlement amounts for energy..."</li> <li>2) Italicize defined term in "Real-time balancing settlement includes settlement amounts that can be..."</li> </ol>	<ol style="list-style-type: none"> <li>1) This section has been amended to incorporate this feedback.</li> <li>2) This section has been amended to incorporate this feedback.</li> <li>3) The acronyms have been retained to maintain consistency with similar headings in the manual and to provide</li> </ol>

ID	Section	Feedback	IESO Response
		<ul style="list-style-type: none"> <li>3) Remove the acronym from the section headings of Sections 2.1.1, 2.1.2, 2.1.3 and 2.3, as the acronyms are defined in the body;</li> <li>4) Remove italicization in "day-ahead market settlement of physical bilateral contracts (PBCs) (HPTSA_PBC{1}); and";</li> <li>5) Remove italicization in "...is less than the market participant's day-ahead schedule."</li> </ul>	<p>an easier reference for the settlement amounts while navigating through the document.</p> <ul style="list-style-type: none"> <li>4) The italicization has been retained as these are defined terms and this is also consistent with the changes made in response to (2) in this comment.</li> <li>5) The italicization has been retained as these are defined terms.</li> </ul>
79	MM 5.5 s.2.2.2.1	<p>There is a reference to Market Rules Appendix 7.5 Section 6.3.1, however, this section has been intentionally left blank in the MRP Consolidated Draft and is not available for market participant review. Please clarify if the reference used is appropriate.</p>	<p>The reference to Appendix 7.5, section 6.3.1 is to the draft <a href="#">Day-Ahead Market Calculation Engine</a> section of the market rules, which has been published but since it has not yet been provisionally approved by the IESO Board, it has not been incorporated into the MRP Consolidated Draft. The calculation engine rules will be incorporated in a future version of the MRP Consolidated Draft.</p>
80	MM 5.5 s.2.13, Table 2-21	<p>There is an extra line break in the second row, second column cell.</p>	<p>This section has been updated to incorporate this feedback.</p>
81	MM 5.5 s.2.23	<p>"...as described in MR Ch.9 s.4.6, will be calculated for settlement hours where the GOG-eligible resource's real-time schedule is less than its minimum loading point, indicating the GOG-eligible resource's intent to de-synchronize from the IESO-controlled grid."</p>	<ul style="list-style-type: none"> <li>1) OPG's interpretation is correct. Resources will not be eligible for RT GOG for hours in which it is dispatched below MLP.</li> <li>2) The applicable ramp-down period is captured in the definition of 'T' and the relevant sections have been</li> </ul>

ID	Section	Feedback	IESO Response
		<p>There is a change to the definition for 'Ramp-Down' period in calculating the RT_RDSA for Market Renewal. The section indicates that the 'Ramp-Down' period as the "real-time schedule is less than its minimum loading point", but it does not clearly state if all dispatches below MLP would be considered part of the 'Ramp-Down' period, with consideration for resource injection, ramping direction and changes in ramp rate during these intervals.</p> <p>OPG interprets that whenever a GOG-eligible resource is dispatched below MLP, regardless of resource injection, ramping direction and ramp rate, those intervals are ineligible for RT GOG. Please confirm if this interpretation is correct.</p> <p>OPG recommends the IESO to provide a clearer definition of what is the 'Ramp-Down' period in Chapter 9 Section 4.6, with consideration given to resource injection, ramping direction, and ramp rates.</p>	<p>amended to incorporate this feedback.</p>
82	MM 5.5 s.4.4	<p>OPG suggests adding in a semi-colon after each bullet point in the settlement amount listing.</p>	<p>This section has been updated to incorporate this feedback.</p>
83	MM 5.5 s.5	<p>There is reference to Market Manual 4.6: Market Remediation in this section. Please see comment to Market Manual 4.4, Appendix G, Table G-1 and provide clarity</p>	<p>The relevant content in Market Manual 4.6: Market Remediation has been re-located to Market Manual 4.2, 4.3 and 4.5. These market manuals are currently being drafted</p>

ID	Section	Feedback	IESO Response
		on the status and release date for the new Market Manual 4.6.	as part of the future Market Systems and Operations batch.
84	MM 5.5 - General	OPG recommends the IESO to clearly define DAM_GOG and RT_GOG eligibility, with respect to the DAM and the RT market settlement process, in Market Manual 5.5.	The eligibility for DAM_GOG (e.g. section 4.4.1 and 4.4.2 of Chapter 9) and RT_GOG (e.g. section 4.5.1 and 4.5.2 of Chapter 9) can be found clearly defined in the Market Rules.
85		<p>Status of Market Rules and Market Manuals As summarized from the feedback above, please clarify the future status and/or provide the release date the following Market Rules and Market Manual sections referenced in the Market Settlements, Metering and Billings Batch:</p> <ul style="list-style-type: none"> <li>• Market Rules Chapter 7 Section 4.B.1;</li> <li>• Market Rules Appendix 7.5 Section 6.3.1;</li> <li>• Market Manual 4.6: Market Remediation;</li> <li>• Market Manual 5.6;</li> <li>• Market Manual 5.7;</li> <li>• Market Manual 5.8;</li> <li>• Market Manual 5.10;</li> <li>• Market Manual 5.11.</li> </ul>	<p>MR Ch.7 and MM 5.6, 5.7, 5.8, 5.10 and 5.11 are currently being drafted as part of the future Market Systems and Operations batch. There are not anticipated to be any significant changes to these market manuals and any updates would be alignment in nature (e.g. utilizing new defined terms).</p> <p>MM 4.6 has been cancelled. and market Remediation content will reside in MM 4.2, MM 4.3 and MM 4.5.</p>
86		<p><b>Hydroelectric Resource Make Whole Payment:</b></p> <p>1) For a hydroelectric generator that has a MinDEL requirement in RT scheduling, is there an opportunity to only make RT</p>	The real-time calculation engine will respect constraints applied by the pre-dispatch calculation engine to meet minimum daily energy limit (MinDEL). If a resource is scheduled above MinDEL by the real-time

ID	Section	Feedback	IESO Response
		<p>Make Whole Payment ineligible for hours where a minimum constraint is passed from Pre-Dispatch calculation engine to the RT calculation engine?</p>	<p>calculation engine for the trading day because it was economic, it will be eligible for RT MWP even if MinDEL was binding in pre-dispatch. Therefore, the current design of using real-time schedules to assess MinDEL is appropriate.</p>
87		<p>Questions for December 14, 2022 Presentation "Market Renewal Program: Market Settlements – Settlements Rules and Manuals (Part 1 of 3)", Slide 83:</p> <ol style="list-style-type: none"> <li>1) What is the ramp rate information (energy ramp up MW and ramp hour) for the DAM_GOG example on Slide 83?</li> <li>2) The averaged hourly MW output is at of 40 and 80 for 04:00 and 05:00, respectively. However, assuming that the sync time is at 04:00, the resource needs to be at 100MW at 06:00 the hourly MW output is an averaged MW output for the hour, OPG calculates the average hourly output to be at 25MW and 75MW for 04:00 and 05:00, respectively.</li> </ol>	<p>The examples provided in the December 14, 2022 presentation are for illustrative purposes and is not reflective of the resource ramp rates.</p> <p>Ramp rates are submitted by market participants as part of their price curves.</p>
88		<p><b>Impact to Market Renewal Program from Replacement of the IESO Settlement System:</b></p> <ol style="list-style-type: none"> <li>1) The MRP Settlements Batch Market Manuals have not incorporated changes from RSS Implementation,</li> </ol>	<p><b>Impact to Market Renewal Program from Replacement of the IESO Settlement System:</b></p> <ol style="list-style-type: none"> <li>1) The approach taken by the IESO has been to reduce the administrative burden of market participants. The RSS</li> </ol>



ID	Section	Feedback	IESO Response
		<p>such as the updated NOD process and new RCSS statements. OPG strongly recommends the IESO to streamline the two set of changes to minimize market participant administrative burden (time and resources) in reviewing the manuals.</p> <p>2) When would the updated MRP Market Rules and Market Manuals that include RSS revisions be available for stakeholder review?</p>	<p>manuals have been published as part of that initiative and will be in effect from May 1 2023 until MRP Go Live. Now that RSS rule and manual changes have been approved, MRP will update those manuals and they will be released as part of the MSO batch this summer and will take effect at MRP Go live. In this way market participants can appreciate the manuals that will be in effect for the relevant periods of time without unnecessary duplication of efforts.</p> <p>2) The IESO utilized an earlier version of the RSS market rules for the Settlements batch and has now updated the settlements batch to incorporate all of the final and approved RSS market rule amendments. The RSS changes related to other chapters (e.g. Chapter 3) will form part of the baseline for the final alignment batch.</p>
89		<p><b>RSS Implementation Concerns</b> OPG would like to share four areas of concern (testing, communication, timeline and documentation) regarding the RSS Implementation process.</p> <p><i>Testing</i></p> <p>1) The absence of a second official sandbox testing environment for RSS is a missed opportunity for the IESO and MPs to</p>	<p><b>RSS Implementation Concerns</b></p> <p><i>Testing</i></p> <p>1) The IESO appreciates the sentiment that a second official sandbox testing would increase confidence in a smooth implementation, but notes that there is insufficient time to do so in advance of the May 1, 2023 RSS commencement date. The IESO notes that after the first</p>

ID	Section	Feedback	IESO Response
		<p>identify any critical system issues prior to the May 1, 2023 in-service date. This risk was evident from the September 2022 RSS Market Trials and can lead to significant administrative burden for MPs post-RSS implementation, such as requiring manual reconciliation and filing of multiple NODs.</p> <p>2) Statement and Data File Format specifications along with the Charge Types and Equations document are important inputs within the settlement process. OPG understands that the delayed release of the Charge Types and Equations document is due to external factors outside of the IESO's control, but would like to highlight that this delay would have significant impact on the development work on the MP's end in meeting RSS Implementation requirements.</p> <p>3) OPG would like confirmation that issues identified during the September 2022 Market Trials have been resolved and MPs be provided the opportunity to perform re-4) testing to provide confidence in the issue resolution. Currently, it is not clear that posted sample statements and Data files will be adequate to complete system testing.</p> <p>4) OPG requires the updated Settlement Schedule and Payments calendar to reflect the change from 23 months to 22 months with regard to the final RCSS. The correct schedule is required to complete system testing.</p>	<p>sandbox testing, market participants were provided sample statements and data files to facilitate their own testing and processes. Additionally, there is training being provided by customer relations to further promote market participant readiness.</p> <p>2) The IESO provided market participants with Settlement Statement and Data File Format specifications along with the Charge Types and Equations to support RSS in July of 2022. Further updates to each document as part of MRP is anticipated as part of the MSO batch.</p> <p>3) The IESO can confirm that the identified issues during the September 2022 Market Trials have been resolved. The IESO is committed to assist market participants with the implementation of RSS. If there are specific files or information that would be of assistance, please let the IESO know.</p> <p>4) The IESO has recently published the SSPC for 2023. The IESO notes that final RCSSs will likely not appear on the SSPC until 2025.</p> <p><i>Communication</i></p> <p>1) Prior to RSS go-live, there have been many opportunities to provide feedback to the initiative, including the posting of rules, stakeholder engagements, market participant readiness activities. Post go-live, the</p>

ID	Section	Feedback	IESO Response
		<i>Communication</i>	
		<ol style="list-style-type: none"> <li>1) OPG proposes the inclusion of a feedback section in the RSS Implementation webpage where MPs can provide dedicated feedback to the initiative.</li> <li>2) There does not appear to be formal communication to MPs when updates are made to the IESO RSS Implementation webpage. OPG proposes that the IESO provide formal notification to all MPs whenever updates are provided, either through dedicated email or through the weekly IESO bulletin. This will ensure timely communication of new information for RSS Implementation for all MPs, particularly as the May 1st Implementation date draws near.</li> <li>3) The updated RSS Market Rules include a new defined term: RSS commencement date. RSS commencement date refers to the date on which MR-00475-R00 comes into effect. However, it is unclear the exact location where the RSS commencement date is identified on the IESO website. The uncertainty in confirmation of the RSS commencement date could create issues for system implementation.</li> </ol>	<p>IESO will consider other activities to support MPs, including OPG's proposal.</p> <ol style="list-style-type: none"> <li>2) The IESO currently provides notifications through the IESO bulletin and separate communications to notify market participants of changes on the RSS implementation page. The IESO will continue this practice.</li> <li>3) As with all market rule amendments, the date on which the RSS rules come into force is as specified in the relevant IESO Board Resolution. The RSS Commencement Date is May 1, 2023.</li> </ol>
			<i>Timeline</i>
			<ol style="list-style-type: none"> <li>1) The IESO acknowledges that there are multiple large initiatives underway and remains committed to engaging with and supporting market participants to facilitate market participant readiness. If there is any specific information, documents, or sessions that would be of assistance, please let the IESO know.</li> <li>2) The IESO will consider the notice of disagreement process timelines surrounding MRP Go-live as part of the final alignment batch.</li> </ol>
		<i>Timeline</i>	
		<ol style="list-style-type: none"> <li>1) The RSS deployment timeline for May 2023 is challenging for MPs, as it overlaps with simultaneous review  MRP Settlement Batch of Market Rules</li> </ol>	<i>Documentation</i>

ID	Section	Feedback	IESO Response
		<p>and Market Manuals. These initiatives place demand on the same resources at the same time.</p> <p>2) The overlapping RSS and MRP Settlement project timelines, along with changes to the schedules (e.g., changes in documentation release dates) results in challenges and difficulties in engaging external vendors due to uncertainties in the schedule and shortfall in resourcing.</p> <p>3) As indicated previously, MRP Go-Live may double to triple the number of NODs and will trigger more RCSS statements. If multiple versions of RCSS statements are issued on the same day, there may be problems with reviewing all the documents with a NOD deadline of six days. Would the IESO consider extending the RCSS review period from six to 20 days or lift the NOD deadline restriction for the first 3-6 months after MRP Go-Live? This is in reference to the feedback to Market Rules Chapter 9 Section 6.3.18.</p> <p><i>Documentation</i></p> <p>1) The MRP initiative does not appear to have considered RSS changes in its documentation of Market Manual 5: Settlements, Part 5.10.</p> <p>2) When would Market Manual 5, Part 5.5 “Physical Market Programs” be available for stakeholder review?</p>	<p>1) The IESO anticipates that the MRP updates to the new market Manual 5.10 will be provided as part of the MSO batch. There are not anticipated to be any significant changes to MM 5.10 and any updates would be alignment in nature (e.g. utilizing new defined terms).</p> <p>2) The RSS updates to Market Manual 5.5 was published on March 24th, 2023.</p>
			<p>IESO is always available to provide support leading up to and post go-live. Please feel free to reach out with any specific concerns or questions.</p>

ID	Section	Feedback	IESO Response
		<p>Overall, there is high risk to a successful RSS Implementation due to the absence of an official retesting period, inconsistent communication, and challenging timelines.</p>	
90		<p><b>Market Renewal Implementation Concerns</b></p> <ol style="list-style-type: none"> <li>1) There is increased shadow settlement system calculation complexity and dataset volume due to the detailed charge type definitions. Per review of the market manual, OPG found that the specified charge types that provides the breakdown details of the settlement amounts defined in the MRP Design document increased settlement system calculation complexity and dataset volumes. For example, Congestion Management Settlement Credit calculations only had one charge type; the proposed DAM Make Whole Payment (MWP) consists of four charge types and the proposed Real-Time Market MWP consists of eight charge types. OPG strongly recommends the IESO to allocate sufficient time for sandbox testing and implementation.</li> <li>2) Market participants may have further comments when all the charge type reviews are completed. Does the IESO plan to have multiple review cycles for</li> </ol>	<p><b>Market Renewal Implementation Concerns</b></p> <p>IESO Charge Types and Equations will be published with the draft Market and System Operations batch of market rules in July 2023. Stakeholders will have the opportunity to provide feedback on the draft batch once published.</p> <p>The Format Specifications for Settlement Statement Files and Data Files will be published in Q2 2024.</p> <p>As illustrated on the Market Renewal Program Project Status webpage, testing activities are anticipated to start in 2024 and continue into mid-2025. Further details on testing timelines will be shared as they become available.</p>

ID	Section	Feedback	IESO Response
91		<p data-bbox="890 282 1388 347">Settlement charge types between now and Market Renewal Implementation?</p> <p data-bbox="842 354 1388 451">3) Market Participants are waiting for the release date for the two following documents:</p> <ul style="list-style-type: none"> <li data-bbox="938 459 1388 557">a. Format Specifications for Settlement Statement Files and Data Files (IMP_SPEC_0005);</li> <li data-bbox="938 565 1388 1084">b. IESO Charge Types and Equations (IMP_LST_0001); OPG requests that the IESO to provide estimated delivery dates to both files, in particular IMP-SPEC-0005, as significant vendor support is required to address the changes and modifications outlined therein, which can result in cascade impact on settlement tools development and testing. Further delay in their release would negatively impact MP readiness for System Testing.</li> </ul> <p data-bbox="842 1127 1388 1224">4) Can the IESO please provide dates for Market Renewal Settlements sandbox testing.</p>	<p data-bbox="1423 1304 1969 1438">Thank you for your feedback. Please send any requests for clarification or specific scenarios to IESO Engagement, this input will be valuable as the IESO continues to</p>

ID	Section	Feedback	IESO Response
92		<p>presented settlement scenario samples were very helpful for MPs to understand the new Market Rules as well as future settlement system implementations. OPG also acknowledges that is a difficult and complex task to develop and communicate a whole set of market rules and manuals for a new settlement process.</p> <p>OPG proposes the IESO to continue scenario studies with MPs to provide additional clarification of the new settlement structure, taking into account MP's operation requirements, as this aids MP's development of systems and processes. OPG looks forward to continued dialogue with the IESO regarding the new settlement system for MRP.</p>	<p>develop a full suite of Market Renewal training materials.</p>
		<ol style="list-style-type: none"> <li>1) From Market Rules Chapter 9, OPG interprets that a DAM commitment period can never overlap with a RT commitment period. This would indicate that a scheduled period cannot receive both DAM-GOG and RT-GOG payments. For example: an NQS resource is committed for 100 MW in the DAM schedule and 200 MW in the RT schedule. Since that time period already has a DAM commitment schedule, would the 200 MW of RT generation receive a DAM-GOG or RT-GOG? If the resource receives a DAM-GOG, then Component 1 of the DAM-</li> </ol>	<ol style="list-style-type: none"> <li>1) The day-ahead market commitment period and real-time commitment period are two distinct periods which do not overlap.</li> <li>2) In the case where the resource has a minimum loading point that is equal to or less than 100 MW, the day-ahead market commitment period will be assessed for a DAM-GOG payment and the incremental MW above day-ahead schedule may be eligible for RT-MWP. The resource would not receive any additional payment under RT-GOG as those costs would have already been</li> </ol>

ID	Section	Feedback	IESO Response
		<p>GOG would only consider the DAM schedule and the DAM MWP.</p>	<p>compensated under DAM-GOG or RT-MWP.</p>
		<p>a. Please confirm if this interpretation is correct or provide clarification if not.</p>	<p>3) In the case where the resource is scheduled in the day-ahead market to ramp up and where its minimum loading point is greater than 100MW, and the hour is committed in real-time at 200 MW, then the resource will receive RT-GOG compensation, but the 100MW ramp up day-ahead schedule will be excluded from the RT-GOG calculation</p>
		<p><b>Reliability Commitment</b></p>	
		<ol style="list-style-type: none"> <li>1) There is a Reliability Scheduling and Commitment Pass for NQS that is scheduled in Pass 2 in the DA Calculation Engine. For this type of scheduling commitment in the calculation engine, is there a cap on the DAM-GOG payment?</li> <li>2) Please outline the differences between a reliability commitment, a manual reliability commitment and an operational commitment.</li> <li>3) How would a Market Participant determine a manual reliability commitment from the information provided in the IESO reports?</li> <li>4) Is the manual reliability commitment process applicable in both DAM and RT time frames?</li> <li>5) Would a manual reliability commitment period be longer or shorter than the Minimum Generation Block Run Time (MGBRT)?</li> <li>6) In the current Day-Ahead Commitment Process (DACP), the DACP reliability commitment period can be longer than the MGBRT. For Market Renewal,</li> </ol>	<p><b>Reliability Commitment</b></p>
			<ol style="list-style-type: none"> <li>1) All GOG-eligible resources that are committed by the day-ahead market calculation engine and scheduled in Pass 3, including those that are scheduled in the Reliability Scheduling and Commitment pass (Pass 2) are eligible for DAM-GOG payments and are not capped. However, reliability commitment may be subjected to mitigation. More information on the relevant mitigation thresholds can be found in sections 2.4.10, 2.4.11, 3.4.10 and 3.4.11 of Appendix 9.4.</li> <li>2) Operational commitments are those that are scheduled economically by either the day-ahead market calculation engine or the pre-dispatch calculation engine whereas reliability</li> </ol>



ID	Section	Feedback	IESO Response
		<p>please provide scenarios where a DAM manual reliability commitment would be scheduled longer than MGBRT.</p> <p>7) Do the DAM-GOG and RT-GOG formulas for operational commitment apply to all manual reliability commitment requested by the IESO?</p> <p>8) The manual reliability commitment process does not go through the calculation engines. Does the IESO cap the DAM-GOG/RT-GOG payment for manual reliability commitment? For example, if the resource submits an energy offer at \$2000, does the resource receive \$2000 in payment without deduction (i.e., the MWP process would not lead to reduction in the payment)?</p> <p>9) OPG recommends the IESO to clearly identify, within the Market Rules Chapter 9, instances of manual reliability commitment vs reliability commitment for the DAM-GOG and the RT-GOG processes, as the wording in the Market Rules for reliability commitment in DAM and RT does not clearly state if the reliability commitment is automated or manual. Currently it is difficult to make the distinction of when a manual reliability commitment is applied.</p>	<p>commitments are the result of the IESO applying a constraint in order to maintain reliability. There is no distinction between a reliability commitment and a manual reliability commitment.</p> <p>3) Reliability commitment will be provided in the Day-Ahead Commitments Report and the Pre-Dispatch Binding and Advisory Schedules Report with the codes DARCMT and PDRCMT respectively. More information on these codes will be provided as part of the Market System and Operations batch.</p> <p>4) Yes, the reliability commitment process is applicable in both the DAM and RT time frames.</p> <p>5) If the reliability commitment is a stand-alone pre-dispatch operational commitment or a day-ahead operational commitment, the resource will be committed for its minimum generation block run-time. However, if the reliability commitment is an advanced pre-dispatch operational commitment or an extended pre-dispatch operational commitment then minimum generation block run-time would have already been completed and the manual constraints could be shorter in duration.</p> <p>6) A resource would be committed for a period longer than minimum</p>

ID	Section	Feedback	IESO Response
			<p>generation block run-time in cases where the underlying reliability concern is for a duration that is longer than the minimum generation block run-time and where the day-ahead market calculation engine did not schedule the required resource(s).</p> <p>7) The DAM-GOG and RT-GOG formulas are the same for reliability commitment.</p> <p>8) Please see response in bullet (1) above.</p> <p>9) Please see response in bullet (2) above.</p>