

Market Renewal Program Feedback Form

Market Renewal Implementation – Draft Market Settlements, Metering and Billing Market Rules and Market Manuals – December 1, 2022 – #2

Feedback Provided by:

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

Following publication on December 1, 2022 the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the draft Market Settlements, Metering and Billing batch of Market Rules and Market Manuals amendments. The draft documents can be accessed from the [Implementation Phase documents webpage](#). Additionally, materials for the December 14, 2022 webinar where the IESO will provide an overview of the documents and will be posted to the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by February 21, 2023. If you wish to provide confidential feedback, please mark the document "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Market Rules – Chapter 9: Market Settlements, Market Billing and Funds Administration

What feedback do you have on the Chapter 9: Market Settlements, Market Billing and Funds Administration draft market rule amendments?

Section / Topic	Feedback
Section 4.4.1.1.c and 4.5.5.c	<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: <i>such 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>
Sections 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>
Section 4.6	<p>This feedback is related to previous Market Manual 5.5 Section 2.23 feedback:</p> <ol style="list-style-type: none"> 1. 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? 2. Please confirm that the resource is not eligible for RT-GOG and RT Make Whole Payment (MWP) in the ramp-down period.

Section / Topic	Feedback
Section 4.10	<p>For an NQS non-pseudo-unit resource generator failure where $AQEI=0$, if $PD_QSI=DAM_QSI$ then $GFC_MPC=0$.</p> <p>Does the above imply that there is no GFC_MPC charge if the resource's DAM schedule is equal to the PD schedule, based on the formula provided?</p>

General Comments/Feedback

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-GOG would only consider the DAM schedule and the DAM MWP.
 - a. Please confirm if this interpretation is correct or provide clarification if not.

Reliability Commitment

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?
2. Please outline the differences between a reliability commitment, a manual reliability commitment and an operational commitment.
3. How would a Market Participant determine a manual reliability commitment from the information provided in the IESO reports?
4. Is the manual reliability commitment process applicable in both DAM and RT time frames?
5. Would a manual reliability commitment period be longer or shorter than the Minimum Generation Block Run Time (MGBRT)?
6. In the current Day-Ahead Commitment Process (DACP), the DACP reliability commitment period can be longer than the MGBRT. For Market Renewal, please provide scenarios where a DAM manual reliability commitment would be scheduled longer than MGBRT.
7. Do the DAM-GOG and RT-GOG formulas for operational commitment apply to all manual reliability commitment requested by the IESO?
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)?

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.