

# MRP - Single Schedule Market | High Level Design

## Stakeholder Feedback Form

<p><b>Date Submitted:</b> 2018/11/26</p> <p><b>Feedback Due:</b> November 22, 2018</p>	<p><b>Feedback provided by:</b></p> <p>Company Name: ITC Holdings Corporation</p> <p>Contact Name: Doug Motley</p> <p>Phone: [REDACTED]</p> <p>Email: [REDACTED]</p>
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The Market Renewal Project (MRP) released a draft of the High Level Design (HLD) for the Single Schedule Market (SSM) on **September 27, 2018**. In order to allow interested parties an opportunity to provide meaningful feedback on the HLD, the IESO has provided an eight week review period which concludes on **November 22, 2018**.

The SSM HLD first draft can be accessed [here](#).

This feedback form is intended to help organize stakeholder feedback in two key areas of interest to the IESO. If stakeholders have additional input, they are encouraged to provide those thoughts in the “Other Feedback/Considerations” section of the form.

Stakeholder feedback is due by Thursday November 22, 2018 to IESO Engagement at: [engagement@ieso.ca](mailto:engagement@ieso.ca)

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Design Element	HLD Page Reference	Stakeholder Feedback	
		Request for Clarification/Education	Considerations for Detailed Design
<b>Price Formation</b>	8-32	<p>ITC requests clarity on the status of the More Frequent Intertie Scheduling (MFIS) initiative, and how elements of the MFIS process will be incorporated into the SSM design.</p>	<p>Regarding price formation in general, ITC supports looking to other jurisdictions, particularly those in the eastern U.S., such as PJM and NYISO, for evaluation of best practices and in order to inform market design changes in Ontario that have been successful in other markets and maximize efficiencies of trading with neighboring markets, including PJM.</p> <p>Regarding the proposed approach to calculation of Intertie Congestion Pricing (ICP), ITC recommends a more thorough discussion and analysis during the Detailed Design phase. Identification of links to Day Ahead Market (DAM) and MFIS designs will also help stakeholders evaluate the proposed design.</p>

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<b>Market Power Mitigation</b>	33-42	ITC has no comments at this time.	ITC recommends a transparent and cohesive Market Power Mitigation design framework across all workstreams (i.e. energy and capacity markets).
<b>Load Pricing</b>	43-52	ITC has no comments at this time.	ITC has no comments at this time.

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Settlement Topics	53-56	ITC has no comments at this time.	ITC has no comments at this time.

**Other Feedback / Considerations**

ITC supports a transition away from the current two-schedule pricing system and implementation of an SSM structure with LMP. A move to SSM is in line with interconnected wholesale markets in US. ITC suggests that LMP should be carefully crafted to ensure alignment with other markets including PJM. Among other benefits, some facilitating features of an SSM such as LMP provide greater price transparency at the interties. This will contribute to improvements in market efficiencies and gains from trade as it will reduce current and future seams issues with other jurisdictions, to the benefit of Ontario ratepayers.

As Market Rules and Market Manuals are updated to reflect design changes captured by SSM, supporting market rules should be initiated to ensure suitable access and usage across HVDC interties. Market Rules and Market Manuals should enable export bids and import offers over contracted transmission lines in Ontario to reservations of transmission capacity on the line similar to the treatment of contracted transmission interties between other North American power markets.

ITC thanks the IESO for the opportunity to provide feedback and looks forward to continued participation within the stakeholder engagement process, particularly in evaluation of the Detailed Design elements and their potential impacts on merchant capacity lines.