From: Jennifer Jayapalan
Sent: April 25, 2024 8:35 AM
To: Trisha Hickson
Cc: IESO Market Renewal; Candice Trickey
Subject: MR-00454-R00 - Market Renewal Program - Market and Systems Operations

Trisha/MRP Team,

Apologies on the late questions and clarifications but wanted to circle back on a couple of points. The first one is just to clarify the concerns for Electricity Storage that I brought up at the last meeting. The second two should be quick and easy questions:

1) **Section 3.1.11** – This continues to be a concern. If an electricity storage facility wants to create an ADE for the generator and load resource to remain flexible in real time, it must offer all hours of the day on both resources. In doing so, it effectively removes itself from the DAM OR market (due to the interim market rules on ability to offer OR if you have both a load and generator offer in the same hour). The resource potentially gets a DAM financially binding schedule that is not taking OR into consideration. Additionally, there are concerns this could have a pricing impact between DAM and RT if a significant amount of OR MW are offered in RT that are not offered in DAM. There are obviously exceptions as noted below to request approval from the IESO control room on ADE exemptions, however in our experience with ADE exemptions, they are rarely granted. It would be helpful to have language that would support an ADE exemption on the load side of an ES resource (either across the board or situationally) to better schedule and optimize these resources and allow for the flexibility they provide.

   3.1.11 A registered market participant that intends for its dispatchable generation resources, dispatchable electricity storage resources, dispatchable loads, or hourly demand response resources to be eligible for dispatch by the IESO for a given dispatch hour of a dispatch day shall establish an availability declaration envelope by submitting a bid or offer, as applicable, for energy in the day-ahead market in accordance with section 3.2.1 on the resource for the applicable dispatch hour, subject to section 3.1.14.

   3.1.12 If a registered market participant for a dispatchable generation resource or a dispatchable electricity storage resource does not establish an availability declaration envelope, the resource shall not operate in the real-time market without the approval of the IESO under section 3.1.14.

   3.1.13 If a registered market participant for a dispatchable load or an hourly demand response resource does not establish an availability declaration envelope, the resource shall not operate in the real-time market as a dispatchable load or hourly demand response resource without the approval of the IESO under section 3.1.14, except for the portion of energy identified to be consumed as a non-dispatchable load in accordance with section 3.3.3.1.

2) 3.3.4 – Forced outage revisions during the RT Market Unrestricted Window and Mandatory Window. This section does not include electricity storage. Please indicate whether this was intentional and/or where electricity storage is referenced in terms of submit forced outage dispatch data revisions.

Replacement Energy Offers – Forced Outage Revisions During the Real-Time Market Unrestricted Window and Mandatory Window

3.3.4B   A *registered market participant* for a *generation resource* associated with a hydroelectric *generation facility*, a *combined cycle* ~~generation facility~~*plant*, an *enhanced combined cycle facility* or a *cogeneration facility* that experiences a *forced outage* may submit revised *dispatch data* ~~for~~on a related *generation* ~~facility~~*resource*, with respect to any *dispatch hour* up until 10 minutes prior to the beginning of that *dispatch hour*. If the revised *dispatch data* is submitted less than 10 minutes prior to the beginning of that *dispatch hour*, the revised *dispatch data* will apply to the subsequent *dispatch hour*. This section is subject to the following conditions:

3) Chapter 11:

"mandatory window means the period time on a *dispatch day* that begins following the *real-time market unrestricted window* and that ends 10 minutes before the *dispatch hour*, or in the case of a *boundary entity resource*, that ends an hour and 10 minutes before the *dispatch hour*; " (**I think this is missing the word 'of' in period of time**.)

real-time market unrestricted window – This definition is not in Chapter 11, please identify where it is defined. It is being identified as a defined term throughout the text.

Thanks!

Jennifer

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