

Feedback Form

MRP Implementation: Market Entry and Prudential Security

The IESO is posting a series of market rules and manuals documents as part of the implementation phase of the Market Renewal Program.

These documents are posted to the following engagement webpage: www.ieso.ca/en/Market-Renewal/Stakeholder-Engagements/Implementation-Market-Rules-and-Manuals-Engagement.

Stakeholder feedback for this batch of documents is due by November 9, 2020 to engagement@ieso.ca.

Feedback Provided by:

Name: Greg Schabas

Title: Senior Market Affairs Advisor

Organization: Ontario Power Generation

Email: [REDACTED]

Date: November 9, 2020

Feedback on Market Entry Governing Documents

<p>Feedback on Market Rules</p> <p>Please include any views on whether the draft language related to Participant Authorization clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language in the feedback column and red-lining the suggested changes. Please also note the section and page number.</p>	<p>Feedback</p> <p>OPG has reviewed the market rules on Participant Authorization and has no comments</p>
<p>Feedback on Market Rules</p> <p>Please include any views on whether the draft language related to Facility Registration clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language in the feedback column and red-lining the suggested changes. Please also note the section and page number.</p>	<p>Feedback</p> <p>OPG has reviewed the market rules on Facility Registration and has no direct comments on this document. However, some of the comments on Market Manual 1.5 (see below) reference the market rules in Chapter 7.</p>
<p>Feedback on Market Manuals</p> <p>Please include any views on whether the draft language related to Market Manual 1.5 clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language in the feedback column and red-lining the suggested changes. Please also note the section and page number.</p>	<p>Feedback</p> <p><u>Section 3.0:</u> The following three phrases are all used in IESO material:</p> <ul style="list-style-type: none"> • 'Register Equipment' (first sentence of Section 3.0, MM1.5), • 'Register equipment' (Stage 5 process diagram on IESO website), and • 'Register Facility' (per Register Facility Help File title) <p>If all these phrases are intended to mean the same thing, please choose one phrase and be consistent throughout all documentation.</p> <p><u>Section 3.1 (among other places):</u> Sometimes the term 'Owner' is capitalized (e.g., "... organizations having an Owner Role..." in section 3.1), and sometimes it is not (e.g., "...<i>facility</i> owner..." in section 3.1.1). If there is a difference in meaning when the term is capitalized vs. when it is not, this should be defined/elaborated somewhere (and usage should be consistent with definitions).</p>

Section 3.1.1 - Table 3-10

The term 'embedded generators' is used, but not italicized (though it is a defined term). The manual should be reviewed for usage of defined terms, and all instances should be properly formatted.

The first entry in Table 3-10 says:

"During the connection assessment process, Participants must confirm with the IESO the number of resources required at their facility. The IESO will determine the number of resources based on the number of transformers at the facility."

The statement that the IESO will make the determination seems somewhat contradictory with the description here and elsewhere that Participants may request a particular number of resources.

Suggested language to improve the clarity of this is as follows:

"During the connection assessment process, the IESO will make a preliminary determination of the number of resources based on the number of transformers at the facility, and market participants must confirm with the IESO the number of resources required at their facility."

The first entry in Table 3-10 says:

"... As part of the Register Equipment procedure, the proponents or market participants are required to provide..."

Suggestion: remove the word 'the' in front of 'proponents' to parallel the usage of 'market participants' that follows:

"... As part of the Register Equipment procedure, proponents or *market participants* are required to provide..."

Table 3-10, 'Prepare Operational Philosophy Document' entry:

This section says: "Market participants must prepare a document attesting their facilities' operating conditions...". It appears that the word 'to' has been removed from the previous language inappropriately, as it seems this section should read: "Market participants must prepare a document attesting **to** their facilities' operating conditions..."

Section 3.2 (bottom of Page 26):

"If any data is determined to be inaccurate, incomplete or missing, the IESO **will** reject it and the Equipment Registration Specialist **would** need to resubmit updated data." Suggestion: change 'would' to 'will' to be consistent... 'IESO **will** reject'/'ERS **will** need to'

Section 3.2.5:

"Tests are scheduled as mutually agreed between the IESO and the market participant. In order to complete the Register Equipment procedures, all **participant** and facility tests must be verified and approved by the IESO."

This instance of 'participant' is not italicized, though it seems clear that this is intended to refer to 'market participant', which is a defined term.

Suggestion: either italicize 'participant' as a stand-alone reference to the intended 'market participant' or add 'market' to make 'market participant' and italicize the entire term.

Section 3.3 (page 30):

- Reference to Table 3-3 should be a reference to Table 3-12:
"...market varies by the groupings set out in Table **3-3**."
- Reference to Table 3-4 should be a reference to Table 3-13:

"... data parameters and resource data parameters using Online IESO, as shown in Table 3-4."

Other instances of incorrect table references were noted, so a review/update of all links/references is suggested.

Section 3.3, Table 3-13 (pages 32-33):

Suggestions

- Please organize the rows of the table to present the 'resource data parameter' fields in the same order as they appear in the sections below that describe them. It appears some (though not all) of the sections below Table 3-13 have references to sections of the Market Rules. It would create a parallel between the structure of this manual and the structure of the Market Rules if the terms in this manual appeared in the same order as they appear in the Market Rules. Please consider organizing in this way.
- Rather than including only an 'X' in each entry in the table to indicate where a data parameter applies to generation resources of a particular classification, it would be helpful to readers to include references to the sections below where each particular parameter is described.

Section 3.3.2, Page 35:

"In all cases, the IESO also records a start date of the quick-start flag value to handle time dependent revisions that effect settlement processes."

From context, it appears the word 'affect' would be a better choice, but it is an ambiguous case, and either word could be what is intended. Recommend reviewing to either confirm 'effect' is what is intended rather than 'affect', or switch to 'affect'.

Section 3.3.3.2 Period of Steady Operation:

(Market Rules: Chapter 7, section 2.2.6H.2)

OPG recommends that hydroelectric resources be allowed to register for the *period of steady operation parameter* in addition to non-quick start generation resources.

Section 3.3, page 35:

The following sentence is ambiguous:

“Registered market participants submitting such dispatch data may do so only for a dispatchable non-quick start generation resource associated with a generation unit that has a primary or alternate fuel type value other than Uranium and a pseudo-unit.”

Is the 'non-quick start generation resource' associated with:

- 1) 'a generation unit that has a primary or alternate fuel type value other than Uranium', and
- 2) 'a pseudo-unit'

OR

Is the 'non-quick start generation resource' associated with 'a generation unit' that has:

- 1) 'a primary or alternate fuel type value other than Uranium', and
- 2) 'a pseudo-unit'?

A bulleted list would be a better way to show the intended relationship, but some way of disambiguating the intent is needed.

Section 3.3.4 (Page 37):

“Modelling of **an** combined cycle...”

Here, 'an' should be replaced with 'a'.

Section 3.3.4.1 (Page 38):

“The number of pseudo-units to be registered is equal to the number of combustion turbine **resource** at the combined cycle facility (refer to Figure 3-2).”

Here, 'resource' should be made plural, 'resources'.

Section 3.3.5.1:

Please clarify what is meant by a “dispatchable hydroelectric generation resource”. Does this include a station with multiple resources or just a single resource? The time lag parameter needs to be available for use at both the station level and resource level.

Time lags between cascading hydro stations can change daily/hourly as a result of changing flow conditions on the grid. This parameter should be included as “Daily Dispatch Data” rather than as “Resource Data” so that time lag durations can be updated to reflect changing river flow conditions.

Furthermore, market participants should have the ability to modify the Time Lag and the MWh ratio parameters intra-day as changing as these interrelationships can change during day as flow/head conditions and unit operating/efficiency points change.

OPG provided detailed comments on these items in its review submission for the Offers, Bids and Data Inputs design section (e.g. Comments #17, 18, 20) and as of November 9, 2020 the IESO has not provided any responses. This section of the Market Manual 1.5 may require revision based on resolution of these review comments.

Section 3.3.5.2:

This section shows only four forbidden regions but the IESO agreed in its responses to market participant feedback on the Offers, Bids and Data Inputs design section that up to five would be allowed.

Forbidden regions upper and lower limits should be part of Daily Dispatch Data rather than Resource data. This is needed to allow for changes in the MWh values based on changes to operating

conditions/head and the best efficiency point for operations.

OPG provided detailed review comments on this item in its review submission for the Offers, Bids and Data Inputs design section (e.g. Comments #12 and 20) and as of November 9, 2020 the IESO has not provided any response. This section of the Market Manual 1.5 may require revision based on resolution of these review comments.

Section 3.3.5.4:

The *start indication value parameter* should be assessed/assigned at the unit level. OPG provided a detailed review comment on this item in its review submission for the Offers, Bids and Data Inputs design section (e.g. Comments #16) and as of November 9, 2020 the IESO has not provided any response. This section of the Market Manual 1.5 may require revision based on resolution of these review comments.

The first sentence of this section states:

"The start indication value represents the minimum quantity of energy, in MW, that a generation unit for a resource must be scheduled to in the day-ahead market and pre-dispatch scheduling processes."

This definition is not consistent with that provided in the Facility Registration Detailed Design (Section 3.6.1) which states:

"The start indication value will be a new optional registration parameter that represents the minimum quantity of energy a resource must be scheduled to determine whether the generation units associated with resource have used up one or more of their maximum number of starts per day."

OPG recommends that the first sentence of Section 3.3.5.4 of Market Manual 1.5 be revised to better reflect that actual purpose of the *start indication value parameter*.

This section refers to a 'maximum number of starts per day', but this is not one of the data fields included in this new version of the Market Manual. This same phrase appeared in Figure 3-2 of the previous version but was also not described in the previous version.

Should the figure that was 3-2 in the prior version be included in this version of this manual?

Section 4.2, pages 56-57

This bulleted list can be improved (made more succinct and readable) by adopting a parallel structure for each bullet, and eliminating redundant words:

“For example, facility maintenance is required in the following circumstances:

- market participation changes, such as:
 - resource type (generation resource, load resource, etc.);
 - bid/offer type resource data parameter changes for generation resources (dispatchable [regular]²², non-dispatchable, self-scheduling, intermittent);
 - bid/offer type resource data parameter changes for load resources (dispatchable [regular]²³, day-ahead price responsive²⁴, non-dispatchable);
 - changes to operating reserve class (10-minute or 30-minute);
 - facility type (generation facility, load facility, etc.);
 - combined cycle facility modelling changes (pseudo unit model, etc.);
- physical site modifications (e.g., changes in MW output, ramp rates, governor models, data monitoring, and voice communication equipment, etc.); and

- changes in operational control, as defined by the registered market participant."

Suggested update:

"For example, facility maintenance is required in the following circumstances:

- market participation changes, such as:
 - resource type (generation resource, load resource, etc.);
 - bid/offer type data parameter for generation resources (dispatchable [regular]²², non-dispatchable, self-scheduling, intermittent);
 - bid/offer type data parameter for load resources (dispatchable [regular]²³, day-ahead price responsive²⁴, non-dispatchable);
 - operating reserve class (10-minute or 30-minute);
 - facility type (generation facility, load facility, etc.);
 - combined cycle facility modelling (pseudo unit model, etc.);
- physical site modifications (e.g., changes in MW output, ramp rates, governor models, data monitoring, and voice communication equipment, etc.); and
- changes in operational control, as defined by the registered market participant."

Section 4.2, page 57:

"As a guideline to Participant with existing facilities, the IESO will issue a RAN for changes such as, but not limited to:"

Suggestions:

- Make 'Participant' plural, and
- Change 'such as' to 'including':

"As a guideline to Participants with existing facilities, the IESO will issue a RAN for changes including, but not limited to:"

Feedback on Market Manuals	Feedback
	<p><u>Section 4.2, page 58:</u> Last three bullets in this section should be formatted as normal paragraph text, rather than as part of the bulleted list.</p> <p><u>General recommendation:</u> Whenever `i.e.` or `e.g.` are used, they should be followed by a comma. This has been done inconsistently in this document.</p>

Feedback on Defined Terms Governing Documents

Feedback on Market Rules	Feedback
<p>Please include any views on whether the draft language related to Chapter 11 Defined Terms clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language in the feedback column and red-lining the suggested changes. Please also note the section and page number.</p>	<p>OPG has reviewed this section and has no comments.</p>

Feedback on Prudential Security Governing Documents

Feedback on Market Rules	Feedback
<p>Please include any views on whether the draft language related to Prudential Security clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language in the feedback column and red-lining the suggested changes. Please also note the section and page number.</p>	<p>OPG has reviewed the market rules on Prudential Security and has no comments</p>

Feedback on Market Manuals	Feedback
Please include any views on whether the draft language related to Market Manual 5.4 clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language in the feedback column and red-lining the suggested changes. Please also note the section and page number.	OPG has reviewed Market Manual 5.4 and has no comments

Stakeholder Comments to be forwarded to Technical Panel

Stakeholder comment is requested on the following IESO directed questions that will be forwarded to Technical Panel for their consideration in the recommendation of market rules to the IESO Board of Directors.

Question	Feedback
Do you believe there is a clear and common understanding of the intent and purpose of the draft market rule amendment?	OPG is not in a position to comment at this point
In your view, is this market rule amendment in the interest of consumers with respect to prices?	OPG is not in a position to comment at this point
In your view, is this market rule amendment in the interest of consumers with respect to the reliability of electricity service?	OPG is not in a position to comment at this point
In your view, is this market rule amendment in the interest of consumers with respect to the quality of electricity service?	OPG is not in a position to comment at this point
In your view, are there any adverse effects (not identified in a previous answer) that may be caused by implementing these proposed changes, either to consumers or market participants.	OPG is not in a position to comment at this point
General Comments	None at this time

General Comments/Feedback