

# Market Renewal Program Feedback Form

## Market Renewal Implementation – Draft Interim Alignment Market Rules and Market Manuals – September 9, 2022

### 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 September 9, 2022 the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the draft Interim Alignment batch of Market Rules and Market Manuals. The draft documents can be accessed from the [Implementation Phase documents webpage](#). Additionally, materials for the September 22, 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](mailto:engagement@ieso.ca) by November 8, 2022.** 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 – Market Manual and Batch Alignment

What feedback do you have on the Market Manual and Batch Alignment draft market rule amendments?

Section / Topic	Feedback
N/a	Please see the EDA's General Comments.

## Market Rules – Load Resources

What feedback do you have on the Load Resources draft market rule amendments?

Section / Topic	Feedback
19.2.6	The EDA seeks greater clarity from the IESO regarding the design decision that restricts price responsive load's ability to register as a demand response contributor. This decision appears to unduly restrict the market participation options of price responsive loads, without either documentation or justification. We propose that the IESO revisit this position at the earliest opportunity.
General	Please see the EDA's General Comments.

## Market Rules – Storage Integration

What feedback do you have on Storage Integration draft market rule amendments?

Section / Topic	Feedback
General	The IESO's " <a href="#">MRP Implementation: Summary of Interim Alignment Batch Amendments</a> " (see PDF page 22) should be corrected to show the following chronological sequence: <ul style="list-style-type: none"><li>- the Energy Storage Design Project Long-Term Vision was completed in September 2020</li><li>- the Final Detailed Designs were published by the IESO in January 2021</li><li>- the IESO's design of the MRP occurred simultaneously with its development of the rules to integrate storage into the IESO's market.</li></ul>

## Market Rules – Resource Related Updates

What feedback do you have on the Resource Related Updates?

Section / Topic	Feedback
General	Please see the EDA's General Comments.

## Market Rules – Defined Terms

What feedback do you have on the Defined Terms?

Section / Topic	Feedback
General	Please see the EDA's General Comments.

## Market Manual 1.5

What feedback do you have on draft Market Manual 1.5?

Section / Topic	Feedback
n/a	No comment

## Market Manual 5.4

What feedback do you have on draft Market Manual 5.4?

Section / Topic	Feedback
n/a	No comment.

## Market Manual 12

What feedback do you have on draft Market Manual 12?

Section / Topic	Feedback
N/a	No comment.

## Market Manual 14.1

What feedback do you have on draft Market Manual 14.1?

Section / Topic	Feedback
N/a	No comment.

## Market Manual 14.2

What feedback do you have on draft Market Manual 14.2?

Section / Topic	Feedback
n/a	No comment.

## General Comments/Feedback

We suggest that the IESO review its package of definitions for whether it is complete, free of circularity and intuitive (or, where the definition is not intuitive, that the IESO document its reasoning for the definition).

Below are examples of an incomplete definition and of a circular definition:

- The term *non-dispatchable load* is defined as “not *dispatchable*” but the term “*dispatchable*” is not defined.
- The defined term *embedded load facility* references a *load facility* whose definition links to *facility* which links back to *load facility*.

Definitions must be clear, capable of being understood and must integrate with each other consistently and as a package. This is essential so that all market participants, including LDCs, can understand their opportunities and risks. It is of greater importance for LDCs, as their customers look to their LDC for information on the risks and opportunities that impact consumers. Definitions must also be clear so that other documents, such as OEB Codes, can be amended consistent with MRP.

The EDA anticipates that the OEB will need to amend the Distribution System Code, the Retail Settlement Code and the Standard Service Supply Code to accommodate, among other things, Day Ahead Market prices, Load Forecast Deviation Charges, Locational Marginal Prices and to enable new IESO market participants (i.e., Price Responsive Loads).

Overall, LDCs require additional information in order to properly review, comment and ultimately implement the IESO’s MRP as LDCs are both wholesale market participants (i.e., non-dispatchable loads) and are subject to the *Electricity Act* and the *OEB Act*. For example, neither the IESO nor the OEB have responded to the EDA’s request to clarify the wholesale market prices that will apply to non-Market Participant loads, generators and energy storage situated within an LDC’s service territory and connected to the distribution system.