



November 8, 2023

*Submitted electronically.*

Jessica Savage  
Program Delivery Executive, MRP  
Independent Electricity System Operator  
1600-120 Adelaide Street West  
Toronto, ON M5H 1P9

**Re:** Market and System Operations Batch – Comments

Dear Ms. Savage,

On July 14, 2023, the IESO published proposed Market Rule and Market Manual amendments related to [Market and System Operations](#). The amendments pertain to:

- Dispatch Data – new obligations and requirements for dispatch data (e.g., minimum, and maximum daily energy limit, daily energy ramp rates, minimum loading point, etc.), and submission timelines, etc.
- Day-Ahead Market (DAM) Operations – DAM timing and inputs, DAM engine calculations, DAM outputs (e.g., pricing, schedules), etc.
- Pre-Dispatch (PD) and Real-Time (RT) Market Operations – PD and RT timing and inputs, pre-dispatch process, PD and RT engine calculations, PD and RT outputs, etc.
- Economic Operating Point – algorithms to determine eligibility for make-whole payments.
- Market Remediation – measures the IESO takes when RT or DAM prices have been improperly calculated/published.
- Market Suspension and Resumption – measures the IESO will take regarding the suspension of the market and resumption of normal activities.
- System Operations – changes related to emergency control action procedures and outage procedures.

In general, these amendments have minimal direct implications for LDCs because LDCs are classified as non-dispatchable loads (NDLs), and as such, they are not obligated to provide dispatch-related data or adhere to IESO dispatch instructions. Instead of being mandated to provide dispatch data, the IESO forecasts NDLs' load as an input into the DAM, PD, and RT calculation engines. NDLs function as "price takers" in the market.

With that in mind, the following key aspects of the proposed amendments hold significance for LDCs:

1. The IESO will enhance the granularity of demand forecasts used as input for the DAM calculation engine.
2. Daily publication of DAM prices by the IESO is scheduled for 13:30 Eastern Prevailing Time (EPT), including the DAM Operating Zone Price (OZP). In case of any delay, an advisory notice will be issued, and DAM results might be postponed until 15:30 EPT. A failure of the DAM will be declared with an advisory notice if valid results cannot be published by 15:30 EPT.
3. The IESO will revamp the process for publishing Real-Time Locational Marginal Prices (RT LMPs), resembling the current publication method for Hourly Ontario Energy Price (HOEP). All IESO reports will undergo modifications to eliminate outdated data associated with the present unconstrained model.
4. An advisory notice will be issued by the IESO whenever significant errors are detected in the DAM results publication (e.g., pricing discrepancies), during DAM price administration, or in the case of dispatch scheduling errors.
5. The IESO will establish administrative prices, where applicable, within four business days following the affected dispatch day. *This represents a change from the current practice of a two-business day timeline for price administration.*

It is important for LDCs to understand these timelines as they may impact automated or scheduled processes of collecting IESO data for customer invoicing, billing, and settlement. The EDA is working alongside the IESO and the Ontario Energy Board to ensure that LDCs are prepared for the implementation of the MRP and has found this engagement to be very productive.

We look forward to future collaboration on the next steps of MRP preparedness as an opportunity to continue our preparations within a reasonable amount of lead time. As the deadline soon approaches, we are encouraged by the OEB's next steps to prepare draft amendments for LDCs prior to the MRP 'go live' date. We further persuade the OEB to release draft code amendments, and staff guidance within the first quarter (Jan, Feb, March) of 2024 to better prepare LDCs in advance of the MRP implementation date.

If the OEB is able to meet this deadline under our mutual understanding of *draft amendments for changes* and prioritizes this step in the process, LDCs can proactively prepare systems and test to properly bill customer flow throughs. **If this is not prioritized, we risk losing the opportunity for a seamless transition and billing complications may increase**, impacting many customers throughout the province.

LDCs also require training for new systems, and it is our expectation that IESO training materials will be sufficiently detailed to provide instructional information to LDCs which cover both normal operations of the wholesale market as well as instances of delay or failure of the DAM.

We appreciate this opportunity to provide feedback, and we look forward to next steps.

If you have any questions or require anything further in this matter, please do not hesitate to contact Brittany Ashby, Senior Regulatory Affairs Advisor at [REDACTED] or at [REDACTED].

Sincerely,

A handwritten signature in cursive script, appearing to read "Teresa Sarkesian".

Teresa Sarkesian  
President & CEO