

# Market Renewal Program Feedback Form

## Market Renewal Implementation – Draft Market System and Operations Market Rules and Market Manuals – July 14, 2023

### Feedback Provided by:

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Date: Nov 8 2023

To promote transparency, feedback submitted will be posted on the Implementation Engagement webpage unless otherwise requested by the sender.

The Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the Market and System Operations batch of Market Rules and Market Manuals amendments. The draft documents can be accessed from the [Implementation Phase documents webpage](#). Additionally, materials for the July 27 and 28 webinars where the IESO will provide an overview of the batch will be posted to the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by November 8, 2023.** 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 – Chapter 5, Sections 4, 6, 7, 8 and 10

What feedback do you have on the Chapter 5, Sections 4, 6, 7, 8 and 10 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Rules – Chapter 7, All Sections

What feedback do you have on the Chapter 7, All Sections draft market rule amendments?



On dispatchable hydro facilities

- Min/Max DEL to be submitted at a Forebay Level
  - If multiple resources share the same forebay, do they have to all be registered as sharing one forebay? Linking multiple resources to one forebay would work for DEL as detailed above, but it may negatively impact MPs as the same information would be applied to MPM. Can MPs link/unlink resources to accommodate for seasonal flow changes?
- Time Lags for 0.5h intervals
  - We understand that time lags may need to be submitted in whole values. However, some stations need to accommodate 0.5hr time lags due to limited storage. For example, a 50MW downstream station with a 0.5hr lag from the upper may need to schedule 25MW in the current hour to accommodate the incoming flows from upstream. Is there a way MPs can communicate this need?
- When Forebay A is economically dispatched in RT, there is a 2hr lag to Forebay B. Forebay B need to then be dispatched to pass the water that is incoming from upstream. In this example, is Forebay B paid the RT price at the LMP or its offer price? Would any difference be paid via a MWP?
- MPs are required to submit the request/documentation for their alternative cost profile at a given time. For hydro, it is the Forebay Refill Opportunity Cost Adder by 9:30 EST. This timeline is too tight for MPs to submit the request on top of having to submit all the new hydro parameters by 10:00 EST. Information to create the offers and the request for the FROC is initiated by the field operations group before going to the marketing team that creates and submits the offers—the proposed timeline leaves only 30mins for the marketing team to react. Please extend the timeline to reflect MPs operational constraints.
- The FROC adder is a fixed \$/MWh every day and does not move with the market like the Storage Horizon Opportunity Cost (SHOC). The FROC data submission deadline could also be set at 10:00 EST as the MPs will know the adder price in advance and can apply that to their offer prices, therefore not needing an updated Reference Pricing Report prior to the closure of the DAM offer window.
- There should not be a need for MPs to manually submit data/requests for the alternative cost profile to the Online IESO Portal as all the relevant data would be submitted in the offers for the DAM that closes at 10:00EST. As such, data can be automatically gathered and processed on the IESO side for validation—a time saving measure for both the IESO and MPs. Can the IESO explain what additional information they would require MPs to submit for the alternative cost profile beyond what is already submitted as part of the DAM offers?

Section / Topic	Feedback
	<ul style="list-style-type: none"> <li>- DEL is only to be used in DAM and not carried forward into the RT Market. This leaves hydro operators with “price” as the key parameter that can be adjusted to reflect operational flexibility. However, offer price is subject to MPM and could create additional generation dispatches, causing operational concerns and distortions in the RT Market. Please clarify how the IESO would account for this limitation.</li> </ul>

## Market Rules – Chapter 7, Appendix 7.1 – 7.4, 7.7

What feedback do you have on the Chapter 7, Appendix 7.1 – 7.4, 7.7 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Rules – Chapter 7, Appendix 7.8

What feedback do you have on the Chapter 7, Appendix 7.8 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Rules – Chapter 11

What feedback do you have on the Chapter 11 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Manual 4.1

What feedback do you have on draft Market Manual 4.1?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Manual 4.2

What feedback do you have on draft Market Manual 4.2?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Manual 4.3

What feedback do you have on draft Market Manual 4.3?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Manual 4.5

What feedback do you have on draft Market Manual 4.5?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Manual 7.1

What feedback do you have on draft Market Manual 7.1?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Manual 7.2

What feedback do you have on draft Market Manual 7.2?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Manual 7.3

What feedback do you have on draft Market Manual 7.3?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## Market Manual 7.4

What feedback do you have on draft Market Manual 7.4?

Section / Topic	Feedback
Click or tap here to enter text.	Click or tap here to enter text.

## General Comments/Feedback

Click or tap here to enter text.