

Stakeholder Feedback and IESO Response

Market Renewal Program: Draft Market Settlement, Billing, and Metering Market Manuals

The IESO published amendments to the Market Settlement Market Manuals on September 7, 2023. The IESO received written feedback from:

Electricity Distributors Association

Evolugen by Brookfield Renewable

Ontario Power Generation

Related presentation materials and recorded sessions have been posted on the IESO [stakeholder engagement webpage](#). If interested, please visit the webpage to reference the feedback submissions directly as the below uses excerpts and/or a summary of the stakeholder feedback for the purposes of providing an IESO response.

Please contact IESO Engagement at engagement@ieso.ca if you have any questions.

Electricity Distributors Association

Table 1 | Electricity Distributors Association Feedback and IESO Responses

Feedback	IESO Response
<p><u>Market Manual 5.6</u></p> <p>Market manual 5.6 references contract payments to embedded generators, including the renewables energy generation connection compensation settlement credit, the FIT program settlement amounts, etc. The EDA is aware that contract amendments (e.g., FIT contracts, etc.) will need to be amended to reflect the new wholesale market prices post MRP. At this time, EDA’s members have not received instructions related to the proposed changes of these contracts or the revised calculations that will determine cost recovery for payments made by the LDCs to IESO-contracted generators. We request that the IESO provide this information to LDCs as soon as possible. This will assist LDCs in preparing settlement changes and make appropriate arrangements to adjust settlement systems with embedded generators. The EDA would appreciate confirmation on behalf of its members that IESO’s training cover multiple elements of Market Manual 5.6 to ensure preparedness for all Non-Market Settlement programs.</p>	<p>The IESO is continuing to support the OEB to draft accounting guidance for LDCs in order to help them understand these and prepare for these settlement changes, as well as anticipated impacts to the Retail Settlement Code (RSC), Standard Supply Service Code (SSSC), and the Regulated Price Plan (RPP) Manual. The OEB has targeted to provide draft guidance documents by April 2024. For more information on how these contracts and calculations will be updated, please contact the OEB directly.</p>

Evolugen by Brookfield Renewable

Table 2 | Evolgen by Brookfield Feedback and IESO Responses

Feedback	IESO Response
<p><u>Market Manual 5.6</u></p> <p>Section 4.5.2.6- Monthly Settlement:</p> <p>Please clarify what kind of facilities that are withdrawing energy is exempt from the Global Adjustment Settlement Amount in Table 4-19.</p>	<p>MRP is not introducing any changes to charge types that are related to Global Adjustment settlement amounts. This request has been forwarded to IESO Customer Relations to clarify which types of facilities are exempted from Table 4-19.</p>
<p><u>Market Manual 5.6</u></p> <p>Section 5.3 – Hydroelectric Contract Initiative (HCI):</p> <ul style="list-style-type: none">• Per the HCI contract, adjustments for errors can be issued up to one year following the end of the contract year in which such statements were issued. Please confirm if this timeline is also applicable to disputes. As the treatments of adjustment for errors and for disputes are covered separately, please clarify how the latter would be treated.• Per the HCI contract, the difference between errors (e.g., arithmetic errors) and disputes is not clearly stated. Please provide a definition and example of a dispute to help market participant distinguish it from errors.	<p>For specific questions regarding your HCI contract, please contact Contract Management at the IESO. You may reach them at contract.management@ieso.ca.</p>
<p><u>Market Manual 5.7</u></p> <p>Section 2.2 – Final Settlement Statements</p> <ul style="list-style-type: none">• We made suggestions on the formatting and presentation of settlement statements regarding retroactive adjustments, prompted by an adjustment of RT-GCG Cost Recovery Charges (cc183: RT-GCG Cost Recovery Charges - Historical Adjustment Period Allocation) in a series of emails in 2021. Our proposal aims to help	<p>Thank you for your feedback. We have forwarded this comment to IESO Customer Relations for future consideration.</p>

market participants flag and verify potential retroactive adjustments ahead of time. We remain available to discuss our proposal with the IESO.

Market Manual 5.8

Section 2.2 – Payment of Settlement Invoices:

- The IESO normally publishes its Financial and Market invoices by 3 pm. In the event where there is a delay and invoices are published later in the day, please allow market participants an extra day (i.e., 3 days rather than 2 days) to process payable invoices.

Section 4.1- Reviewing Settlement Invoices:

- We ask that the IESO proactively communicate issues and errors—for example the Incorrect Tax calculation with RSS Go live—to market participants to help us prepare to take the appropriate settlement action.

Thank you for your feedback. We have forwarded this comment to IESO Customer Relations for consideration.

Thank you for your feedback. The IESO has reviewed the lessons learned during the RSS Market Trials and will be communicating outstanding issues to Market Participants at the wrap-up meetings of each test phase.

Ontario Power Generation

Table 3 | Ontario Power Generation Feedback and IESO Responses

Feedback	IESO Response
<p><u>Market Manual 5.6</u> Section 4.1, Table 4-1</p> <p>CT145 is listed as a “Manual Line Item (MP)”, however, CT145 has been converted to a “Detailed Record (DP)” through the Replacement of the Settlement System (RSS) Implementation process (March 1, 2023 presentation - Refresher - Implementation for the Replacement of the Settlement System Project).</p>	<p>The IESO will make the correction to Table 4-1 as part of final alignment batch.</p>
<p><u>Market Manual 5.6</u> Section 4.1, Table 4-2</p> <p>IESO has indicated that the Regulated Hydroelectric Generation Balancing Amount (CT195) is subject to OEB regulation. CT195 is listed as a “Manual Line Item (MP)”, but this charge code has been converted to a “Detailed Record (DP)” through RSS Implementation (see above reference presentation). Please clarify if CT195 will be a Detail Record “Detailed Record (DP)” or “Manual Line Item (MP)” upon Market Renewal.</p>	<p>The IESO will make the correction to Table 4-2 as part of final alignment batch.</p>
<p><u>Market Manual 5.6</u> Section 4.3.3, Table 4-7</p> <p>CT1463 is listed as a “Manual Line Item (MP)”, however, CT1463 has been converted to a “Detailed Record (DP)” through the Replacement of the Settlement System Implementation process (see above referenced presentation).</p>	<p>The IESO will make the correction to Table 4-7 as part of final alignment batch.</p>
<p><u>Market Manual 5.6</u></p>	<p>The IESO will make the correction to Table 4-19 as part of final alignment batch.</p>

Section 4.5.2.6, Table 4.19

CT6148 is listed as a charge type within this table. In the baseline IESO Charge Types and Equations, CT6148 has been retired effective December 31, 2021.

Market Manual 5.6

Guide to Settlement Claims and Data Submissions via Online IESO in Market Manual 5.6 Section 2

This guide is not updated to reflect MRP updates. Below are examples from the guide not aligned with MRP design:

1. Sections 4.5, 4.7 and 4.8 referred to the Hourly Ontario Energy Price (HOEP). The HOEP will be retired upon Market Renewal. Suggest updating with the appropriate replacement.
2. Section 4.9 referred to the Real-Time Generation Cost Guarantee Program (RT-GCG). The RT-GCG Program will be retired upon Market Renewal. Suggest revising with the appropriate replacement.

The "Guide to Settlement Claims and Data Submissions via Online IESO" will be updated in Q2 2024.

Market Manual 5.7

ss.2.3

The section refers to RCSS statements incorporating "any adjustments resulting from any of the following that were resolved before the final settlement statements were issued" Shouldn't this step have been processed before the RCSS is issued instead? Should be semicolon after "issued" instead of colon.

The IESO has fixed the issue and updates to Market Manual 5.7 will be provided in January 2024.

Market Manual 5.7

SS.2.3

OPG requests IESO clarify if there are any Charge Types will be settled in RCSS statements such as CT 1314, 1315, 1316, 1317, or 1318, etc.

This request has been forwarded to IESO Customer Relations to clarify which charge types will be settled in RCSS statements.

Market Manual 5.7**ss.2.4**

The hyperlinked Quick Takes "Retrieving Reports via IESO Reports Site" edition should be updated to reflect instructions to access the new portal.

The "Retrieving Reports via IESO Reports Site" Quick Takes will be updated in Q1 2024.

Market Manual 5.7**ss.2.4**

The referenced MM 6: Participant Technical Reference Manual should be updated to reflect the screenshots of the current IESO Gateway and Online IESO Browser Client. In MM 6 ss.3.1.2, the hyperlink to the "Dispatch Service Client User Guide" should be updated because it fails to direct to the guide.

The IESO will update Market Manual 6: Participant Technical Reference Manual to reflect these changes. The new baselined version of this document will be available on the Market Rules & Manuals Library section of the IESO website in Q2 2024.

Market Manual 5.7**ss.3.1, Table 3-1: Settlement Detail Records ('DP' record)**

New settlements details for prior trading days may be included in PSS and FSS, however it does not include RCSS. Please clarify why RCSS is omitted from the description? This is not in alignment with RCSS statements which have information in PSS and FSS for the same trade date.

RCSS transactions are identified by settlement type "recalculated" within the Settlement Detail Records ("DP record")

Market Manual 5.7**ss.3.1**

The "Technical Interfaces" webpage contains several broken document links. Please update.

The document links provided in section 3.1 are correctly linked to the "Technical Interface" webpage. All other broken document links will be updated on the Technical Interface webpage.

Market Manual 5.8**ss.3**

The hyperlinked Quick Takes "Retrieving Reports via IESO Reports Site" edition should be updated to reflect instructions to access the new portal.

The "Retrieving Reports via IESO Reports Site" Quick Takes will be updated in Q1 2024.

Market Manual 5.8

ss.3

The referenced MM 6: Participant Technical Reference Manual should be updated to reflect the screenshots of the current IESO Gateway and Online IESO Browser Client. In MM 6 ss.3.1.2, the hyperlink to the "Dispatch Service Client User Guide" should be updated because it fails to direct to the guide.

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Market Manual 5.8

ss.3.1

Please update hyperlink in Appendix A: Forms of the Technical Interface document "The Market Participant Invoice".

The hyperlink indicated in your comments does not exist in the current version of MRP Market Manual 5.8.

Market Manual 5.10

ss.3

Based upon OPG's experience with RCSS implementation and previous discussions, we recommend submission of RCSS NOD deadline for physical market to be extended from 6 business days to 10 business days. This is also because RCSS statements are issued on a monthly basis, and Market Participants may receive multiple monthly RCSS statements on the same day. This poses a significant challenge for MPs to reconcile all the RCSS statements within the given timeframe of 6 business days.

A temporary change to NOD timelines for the purposes of facilitating the MRP transition is being considered as part of Final Alignment.