

Market Renewal Program Feedback Form

Market Renewal – Final Alignment Documents – June 7, 2024

Feedback Provided by:

Name: Vlad Uruokov

Title: Click or tap here to enter text.

Organization: Ontario Power Generation

Email: Click or tap here to enter text.

Date: Click or tap here to enter text.

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 Final Alignment batch of Market Rules and Market Manuals amendments.

Please submit feedback to engagement@ieso.ca by August 6, 2024. 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.

Chapter 1 – Sent July 15, 2024	
A.1.4	<ol style="list-style-type: none"> 1. Please use either “in effect before” or in “effect prior” for consistency 2. Is “in effect” an appropriate term in relation to “breach, non-compliance offense or violation”? 3. As a follow up to the above, what will be the treatment if a breach, for example, straddles the timeframe of transition and the new rules affect the breach itself. 4. Add “;” at the end of A.1.4.3 5. Replace “,” with “:” at end of A.1.4.4 6. See comment re “Interpretation Bulletins” below
A.1.5	Section A1.4.3 describes “breach, non-compliance, offence or violation”... whereas A1.5. refers to “investigation, proceeding or remedy” - these are not the same. Please clarify in terms of what is “described” in subsection A.1.4.3
8.1.1.3	Can the IESO confirm that “facsimile” is still an acceptable (and preferred?) means of communication in terms of available communication infrastructure. If not consider updating where relevant. See deletion in Ch 8 for TRs
10A.2.1	Replace “;” after 1998 with “,”
10A.3	OPA no longer exists as an entity. Consider revising.
12.1.5	Can the IESO comment on the status of IBs in the new market. Are they considered part of market manuals? Some IBs comment on market rules and will be impacted by MRP.

Chapter 2 – Sent July 15, 2024	
B.1.1	<ol style="list-style-type: none"> 1. What is the criteria for data sufficiency? Is it a certain number of days or billing cycles? 2. A “billing period” is a period of calendar month. Can you confirm if the three most recent periods will include invoiced transactions or most recent transactions. For extra clarity, if MRP is live on May 1, 2025 how is the 3 billing period determined?
1.2.2.7	I think “has disclosed to the” was deleted in error? If not, further changes are required to correct wording.
3.1.2	Italicize “application for authorization to participate” in 3.1.2
4.1.4	Fix reference
4.1.11	What about 4.1.6 and 4.1.8 – these should be added as items that can be disputed by a participant.
5.2.5 5.2.7A	The change from “section” to “s.” doesn’t seem to be consistently applied in 5.2
5.2.3	Word “section” is duplicated in last line.
5.1.3	This section 5.1.3 is very confusing and difficult to understand as to what is applicable. Consider if there is a way to make it easier to read.
5.2.8	Confirm there are Market Rules that obligate the IESO to send such notice (“notice

	of the exercise by the IESO...) along with applicable timelines.
5.3.12	Remove comma after physical transaction. Make language consistent between “for physical transactions” and “in respect of physical transactions”
5.4.1	Confirm there is clarity of treatment of market participants who are also “virtual traders”. Do the “virtual traders” have to have an active virtual position or only be registered as a “virtual trader”?
A	The word “thereof” was deleted in 5.5.1.1 a). Consider deleting in 5.5.1.2. as well
5.2.10	Propose to move this to 5.1, rather than at the end.
5.3.2	With the deletion of “at least 7 business days”, what is the applicable period for submission of a trading limit.
5.3.4.1	Change first “that” to “the”
5.3.4	Confirm that this limit will use “energy market billing periods” that are in effect prior to the implementation of MRP
5.3.6	Is there a need to add for the “remainder of the current”, given that 5.3.6.2 refers to the limit that is already in effect for the current period?
5.3.7	Does this deletion mean a participant can request to change its trading limit?
5.3.8.2	Does this apply to retailers as per 5.2.10?
5.3.8A 5.3.3B	Confirm this section is also rendered unusable as per removal of PBC functionality.

5.3.10A.1	Suggest clarifying that is for “all hours” in a. Also is a. needed if there is no b.? Suggest combining into one.
5.3.10A.3	Shadow prices are not subject to +/-MMCP. As such, there may be significant distortions in both positive and negative direction. Suggest implementing a cap.
5.3.11	There is an extra “,” or an extra “and”.
5.3.12	Extra “,” after “transactions”
5.6.1 5.6.5 5.6.7	<p>It is difficult to assess applicability of subsections in 5.6 in relation to “virtual trading” as some sections are qualified as “...not a virtual trader”, others” not an energy trader” and “authorized to conduct virtual transactions”.</p> <p>Please confirm these qualifiers are used appropriately. What does it mean “to be authorized” as compared “to be a ...”</p>
5.8.6.3	<p>Confirm “transactions for energy” is not “physical transactions for energy” as elsewhere in this chapter.</p> <p>Confirm the three previous billing periods will extent into the current market (as in are not reset at MRP)</p>
5C.1.6	“For virtual transactions” appears twice. Consider removing first instance for clarity.
5C.1.7	Is this to mean that the IESO will establish this amount each “billing period” (i.e., each month?)

5C.1.9.1	There are two terms in brackets and one reference to a single value. As there is no b. consider combining into one.
5C.1.9.2	<p>“Interim price delta” is not used anywhere else in this chapter. What is the purpose of defining it here?</p> <p>a. Shadow prices are not subject to MMCP</p> <p>b. Can you clarify c. Assuming more recent data will be weighted more, please add language to clarify. Also explain what is the “data” referred to in c.</p> <p>And “or” in b.</p>
5C.1.10 5C.1.11	5C.1.11 should refer to data being published as soon as it’s modified as per 5C.1.10, rather than “annually” as the modification can be more frequent.
5C.1.12.3 5C.1.12.4 5C.1.12.5 5C.1.12.6	<p>Move the “and” from 12.4 to 12.5</p> <p>What is referred to as “the status of a virtual” trader? – consider expanding or defining the term.</p>
5C.1.13	Extra “,” after “for virtual transactions”. Consider rewording “shall apply with effect from...” with “the effective date of the ...” to align with the next sentence.
5C.2.2	Replace “;” with “.” At end of section.
5C.3.3	Shadow prices are not subject to MMCP
5C.4.1	The time is prescribed in “5C.4.2” not “5C.4.3”
5C.6.1	Confirm “the most recent six energy market billing

		periods” will include period before MRP is implemented.
		Shouldn't this section be in 5D given that it assumes that category of participants (both virtual and physical?)
8.2.3.2		Please explain why this section was deleted.
8.6.1.1		The default is presented as an “or” for real-time “or” day ahead, but the process below becomes an “and”. Please confirm the equation is appropriate in terms of either delineating between or including both markets. For example what is the “net transaction dollar amount” in terms of the two markets?
1.2.3		Insert space after “Ch.5 s.12”
The <i>market participant</i> agrees to pay to the <i>IESO</i> forthwith on demand all reasonable costs, charges, expenses and fees (including, without limiting the generality of the foregoing, legal fees on a solicitor and clients <u>substantial indemnity</u> basis) of or incurred by or on behalf of the <i>IESO</i> in the realization, recovery or enforcement of the <i>prudential support</i> provided by the <i>market participant</i> and enforcement of the rights and remedies of the <i>IESO</i> under the <i>market rules</i> or at law or in equity in respect of the participation by the <i>market participant</i> in the <i>real-time market</i> and the <i>day-ahead market</i> .		Can the IESO comment on the significance of this edit, if any?
3.1.3 4.1.5		Use of both "market participant" and "person" to refer to the same entity
4.1.5		How long does the IESO have to issue the extension?
5.3.3		“Energy market billing period” is not defined in Ch 11
5D.3.2		Consider defining consolidated margin call to distinguish from margin call
5D.4.2		Is there sufficient clarity elsewhere in the MRs what happens if this timeline is not met?

Chapter 3– Sent July 15, 2024	
2.2.1.8 2.2.1.9 2.2.1.10 2.2.1.11	Remove “and” in 2.2.1.8 Replace “.” With “;” in 2.2.1.9
2.2.3 2.2.3.9	Could the IESO confirm the language change means that IRP will be subject to Section 2, as per 2.5.1A.4H
2.5.1A.4H	What type of notification will the IESO provide to participants when it registers reference levels/quantities following an IR
2.6.9 2.6.10 2.6.11 2.7.16 2.7.17	Change “him or her” in 2.6.10 to “the mediator” and “arbitrator” in 2.7.16 and 2.7.17 for consistency
6.5.1 6.5.2	6.5.1 refers to the deregistration of a “facility” and refers to “resources” as long as they are associated with a “facility”. 6.5.2 and following sections refers to “facilities” OR “resources”, implying a resource can be deregistered without a deregistration of a facility. Please explain if a resource can be deregistered and update 6.5.1, if so.
6.6.6B.1 6.6.6B.2	Change “;” to “:” after “follows” Add “; and” to 6.6.6B.1

Chapter 4 – Sent July 15, 2024	
7.3.1.2	Explain what is the situation where a facility is not associated with any resources in this context.
Appendix 4.1.15	Missing italicization of a lot of terms here: “market participant”, “resource” etc...
B C	Use “providing” or “that provides” for consistency. Confirm this is not adding incremental obligation to report at a unit level.
(b) any embedded electricity storage participant (i) that is not a market participant or whose embedded electricity storage facility is not a registered facility associated with any resources ; (ii) whose embedded electricity storage facility includes an electricity storage unit with an	Remove extra “;”
4. Base Point	Remove “,” before “providing regulation”. Should “unit” be pluralized (or add “for each unit”) as there may be more than one unit that provides regulation for each “facility associated with a resource”
4.1.2	Embedded facility is not defined. Embedded Market Participants Is defined in terms of a facility.
5.1.2	Consider defining “compliance monitoring” and “performance testing”
3.1.3	Not a defined term, I believe storage participant is
3.1.1 7.3.2A	The Appendices are 4.20 to 4.40. Also in these appendices there are references to medium

	performance standard and high performance standards (not to minimum). It is not clear what defines minimum vs medium etc. Consider adding more specificity
6.1 6.1.1 6.2 6.2.1	I don't think either terms connecting market participant or connected market participant are defined. Please define in Ch11

Chapter 5 – Sent July 15, 2024	
3.5.1.5	Correct font in b.
4.5.2A	Previous language was based on CAOR rules. The new language only speaks to implementation of voltage reductions and 30R decreased requirements – can the IESO confirm that the new approach replacing CAOR is adequately captured elsewhere in MR in terms of process.
8.4.1	<p>The period of applicability is unclear. Specify how long can the compensation be applied for.</p> <p>Are 8.4.1.4 and 8.4.1.5 done at an interval resolution? If so, clarify.</p> <p>What if the compensation as defined in the last section is higher than the MWP and/or the balancing credit. Will the participant receive the delta or those intervals will not be subject to a compensation calculation altogether.</p>
12.1.3	Correct font in a. and b.

1.1.2	The net injection of withdrawal of the facility as a whole can be much different than the net injection or withdrawal at the resource level. Can the IESO confirm the appropriateness of this change
1.3.2	Confirm the unit of application is at the “unit” rather than the “facility” level. Also elsewhere the unit of application was “resource” rather than “unit”.
12.1.3.2	Please confirm this is defined. See comments on these terms in Ch 4
6.2.2A	Quarterly and weekly advance approvals are defined terms

Chapter 6 – Sent July 15, 2024	
Chapter 7 - Previously submitted based on MSO batch. Sent April 24, 2024	
1.2.2	<p>While I understand the applicability of “integrated fashion” when applied to a real time energy and OR markets (i.e., joint optimization), does this term make sense across Day Ahead AND real-time. These are distinct markets with integrated Energy and OR, but not integrated across all four bullets.</p> <p>Why is OR thought as comprised of “physical transactions”. I understand the distinction to “virtual” but perhaps there is more appropriate terminology for reserve, which is a stand by product.</p>
1.6.1 1.6.1.1 1.6.1.2 1.6.1.3 1.6.1.4	The MMCP is a defined term. I propose the definition is repeated here rather than coming up with new language.

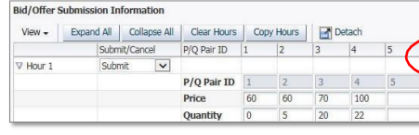
	<p>The MORP is a defined term. I propose the definition is repeated here rather than coming up with new language.</p> <p>Also, if the “by the IESO board” is a change to MMCP and MORP, propose language is added to Chapter 11 definitions as it exists for “Settlement floor price for energy”</p> <p>Correct “;” to a “.” For 1.6.1.4</p>
<p>variable generation means all energy that is supplied by a variable generation wind and solar photovoltaic resources with an installed capacity of 5M wind and solar photovoltaic resources that are directly connected to the grid;</p> <p>variable generator means a generator whose generation facility is class generation;</p>	<p>Can we confirm that variable generation resource is defined. Seems there is a term missing in the latest revision of Ch 11</p>
1.6.2	<p>These were subject to public consultation. Check if IESO Board is appropriate and/or additional language should be added to describe the process and participant engagement.</p>
1.6.3	<p>What is a “lamination volume limit”?</p>
1.6.4 1.6.4.1 1.6.4.2 1.6.4.3	<p>Why “for a given dispatch day”. Wouldn’t the same apply even if it is for a given “hour”? Propose “during a given dispatch day”</p> <p>I don’t think “administrative pricing” is defined – “administrative price” is</p>
1.6.6	<p>Use defined terms or at least use “calculation engines”. Is it issuance or publication?</p> <p>What is an example of such information?</p>
2.1.1.4	<p>In case there is an active dispute when the new market is operationalized, what reference levels will the IESO use – should</p>

	that possibility be recognized in the market rules.
2.1.3 2.1.3.1 2.1.3.2 2.1.3.3 2.1.3.4	<p>I don't understand 2.1.3.3's reference to "in the case of a distribution system" when 2.1.1 refers to "facility embedded within a distribution" system. Propose to correct or clarify.</p> <p>Even if corrected to include "facility embedded within a distribution", confirm the 1MW applies (if its embedded)</p>
2.2.6A.2 <i>start indication value means the minimum quantity of energy in MW the scheduled to determine whether the generation units associated with the one or more of the submitted maximum number of starts per day;</i> <i>maximum number of starts per day is-means the number of times that started within a dispatch day;</i>	<p>Change "not exceeding ..." to limited to the number of. Current wording suggest the value has to be less then the number of units, which is not the case.</p> <p>Not clear if starts will increment once the schedule is again lower than the number</p>
2.2.6A.3 2.2.6A.4	<p>Add "and" after ";</p> <p>Clarify if these forbays need to be linked, as the timelag is only a feature of the linked forebay</p> <p>Consider adding specificity in terms of which forebays are referenced here.</p>
2.2.9 2.2.9.1 2.2.9.2 2.2.9.3 2.2A 2.2A.1 2.2A.2 2.2D.6	<p>What is the reason for removal of "commissioning generation facility" while 2.2A still states "in accordance with section 2.2". Now section 2.2 doesn't have any made mention of commissioning.</p>
2.2.11	<p>Why is the word "associated" deleted? The term resources is not mentioned in the first part of the sentence and therefore the term "those ... resources" is unclear – what resources is this referring to?</p>

2.2.19 2.2.20	<p>Could you explain why changing to a DL required 180 days in comparison to the 75 days for any other direction of change on the load side (including from a DL to NDL or PRL)</p> <p>2.2.20 adds confusion in relation to 2.2.19.2 which gives a 75 day window.</p>
2.2.21	<p>Where is the “resource specific information” listed (see Deletion of Ch 9). Also, isn’t there a further requirement as to what some of the information is to actually contain – see definition requirements.</p>
2.2A.2	<p>Why does 2.2A.2 use the term “generation facilities associated with a self-scheduling generation resource” while applied to “commissioning generation facility” rather than the term “self-scheduling generation facility”, which is already defined based on a “self-scheduling generation resource”</p>
2.2A.1 2.2A.2 2.2A.3	<p>Why does 2.2.A.3 refer to participation in the day ahead or real time markets, whereas 2.2.A.1 refers to participation in only the real time market.</p>
3.1.12 3.1.13 3.1.14	<p>3.1.12 and 3.1.13 refer to instances when an ADE is not established, meaning its not set whereas 3.1.13 speaks to an increase presumably from a set value. Seems like 3.1.14 need to be amended to reflect an approval of something more than an increase to cover section 3.1.12/13</p>
3.2.1	<p>Are “day-ahead market submission window”, “day ahead market restricted window” and “standing dispatch data” defined terms?</p>

3.2.4 3.2.5 3.2.6	<p>In what case will the IESO use 3.2.6 (most recent dispatch data) in the context of 3.2.4 which states the IESO will approve submission within a window. Is this saying that if the IESO DOES NOT approve as per 3.2.4, the IESO WILL then use the data submitted before 10:00 EPT on the day prior?</p> <p>It is not very clear with the current wording</p> <p>Is EPT deliberate, where EST is used elsewhere?</p>
3.2.5	<p>In IESO's response to OPG comment on 3.2.5, the IESO indicated that the language should not only reflect IESO's inability to "receive dispatch data", but also a participant's ability to "send information". The current language does not reflect this dual mode of failure and should be updated.</p>
3.3.2	<p>"on a resource" or "for a resource"?</p> <p>What is the difference between a revision to dispatch data and revised dispatch data.</p> <p>What is the significance/intent of this section?</p>
3.3.1	Change ";" to "·"
3.3.3.2	<p>What is the significance of the reference to market manual? In what circumstance will the MM allow for a revised ADE?</p>
3.3.3.4	<p>Is the intent of this statement that a GOG-eligible resource scheduled in DA can not increase SNL and can not increase the prices for quantities up to MLP from the last DA offer price?</p>

	If so, suggest clarifying as “above the latest offer price corresponding to this quantity”
3.3.3.7	Explain rationale for not changing offers for hours when a resource has NOT received a commitment?
3.3.3.8	Why is the term “latest offer” used in 3.3.3.7 and “its energy offer prices” in 3.3.3.8
A B	Explain what does “b” require? An example would be useful
3.3.3.10	a) relates to time and b) to a quantity explain how a and b are applied with an example
3.3.41	Assuming these are “and” conditions, apply same nomenclature as elsewhere using “; and”
3.3.41	Can the resources be a part of a different facility? If so, what is the definition of “without delay”. Does this relate to a shared forebay definition?
3.3.6	What “quantity” is being referenced in relation to “poses risk”?
3.3.6.1 3.3.6.2 3.3.6.3	Explain the last sentence in regards to referring changes to the MSP. What criteria will the IESO use? Is this applicable only to section 3.3.5
B C	Change “;” with “.” For c)
3.3.7.4	What is “certain daily dispatch data” referring to and what is the applicable market manual?
3.3.8.1 3.3.8.2	Is this applicable to (iv) or to 3.3.8 Consider rewriting as a separate section Clarify what is “change in quantity” and under what circumstances. Why is the MSP flagged here given that this section is titled

	“obligation to Revise Dispatch Data”						
3.4.1.1	What is referred to here as “the appropriate”?						
3.5.6.2	What is referred to by “dispose of excess energy”						
3.5.15.3	Clarify that it is not the sum of the submissions, but rather the sum of all MHOs for each hour in a given day						
3.5.16	Reword “expects to be necessary” in terms of what is expected to be necessary						
3.5.22.6 3.5.22.7	Are there any defined terms in 3.5.22.6? Replace “;” with “.” In 3.5.22.7						
3.5.22.7 3.5.25	There is no further explanation as to what is expected from a thermal state submission in 3.5.35 Are both of these needed?						
3.6.2	Why was “for each class of OR” deleted? There are 2-5 PQ pairs for each class – see 3.6.1						
3.6.3	Clarify “by a corresponding”. There can be up to 20 energy offers and 5 OR offers. Consider rewording for clarity						
3.6.5	<p>Proposes to inject “energy” ?</p> <p>Where are the extra requirements re 10N and 30R as per below flagged</p> <p>5. If required, enter your Reserve Load Point for the applicable hour(s). The Reserve Loading Point specifies the minimum generation level in the generator can provide its maximum operating reserve of the class. This information allows the IESO to simultaneously schedule energy and reserve for the generator.</p> <table border="1"> <thead> <tr> <th>Market Participant</th><th>Reserve Load Point Options</th></tr> </thead> <tbody> <tr> <td>Generator</td><td> <ul style="list-style-type: none"> This field must be greater than 0 when spinning OR. This field must be set to 0.0 when not spinning OR. This field can be left empty or set to minute spinning OR. </td></tr> <tr> <td>Load, Importer, Exporter</td><td>This field can be left empty or set to 0.0</td></tr> </tbody> </table> 	Market Participant	Reserve Load Point Options	Generator	<ul style="list-style-type: none"> This field must be greater than 0 when spinning OR. This field must be set to 0.0 when not spinning OR. This field can be left empty or set to minute spinning OR. 	Load, Importer, Exporter	This field can be left empty or set to 0.0
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3.6.6	Isn't the submission of the RLP in itself sufficient to govern the DSO. It may be hard for participants to track this. In other words, why submit an RLP if the participant then is expected only to offer if RLP is not an issue?
3.6.7	Is it practicable for participants to remove OR offers based on a PD energy run, as subsequent runs the energy schedule may be above RLP. In essence same point as above, isn't the RLP there to help participant not needing to micromanage offers?
3.9.2 3.9.2.1 3.9.2.2 3.9.3.3 3.9.4.4	Is the use of EST/EPT particularly for 2.2 and 2.3 deliberate?
3A.1.4.1	I don't see "intertie meter" as a defined term, only "intertie metering point". Connected is not a defined term, "connect" is.
<u>balance interchange accounts with other control area operators)</u> <u>IESO's best estimate of the maximum flow on the single transmission to an intertie zone may reflect the integrated power system's limit capability to supply and export energy to an intertie zone and adjacent neighbouring transmission system without scheduling imported and supply the exported energy; and</u>	"may" vs "will". In what circumstances will the IESO use this, particularly given the recent issue in this regard?
3.A.1.43	Propose "that represents" instead of "to represent"
3A.1.5	<p>"reliable" is not a defined term.</p> <p>Should it be "contingency event" (not "events" plural) which is defined as a failure of single or multiple components?</p> <p>What practice is referred to by the statement "IESO's commitment to neighbouring transmission systems for regulation"?</p>
3A.1.6 3A.1.6	Why is "demand forecast" not included in "forecast data" in 3A.1.7?

4.3.1 4.4.1	<p>“DAM calculation engine” is not a defined term, although day-ahead market and DAM are both defined. Would be less confusing if only one is used.</p> <p>IESO’s feedback stated that notification will take the form of “DAM notification” on IESO’s website as per MM4.1. S7.2. Suggest language reflects means of notification or at a minimum states “in accordance with the MM”</p>
4.7.2.2	What is the “forecast period” in this context? Is it a longer period than the “for the next dispatch day”? If not, consider removing or clarifying
4.7.5	Can you provide an example of how these prices will be published.
4.7.6	Can you provide an example of how the “summary of hours related to global market power” will be published.
4.8.1	“Publish” is a defined term but “issue” is not. I assume the distinction relates to publishing broadly vs. providing specifically on a participant basis. Consider defining “issue” for consistency
4.8.1.8	Could you provide an example of the information that will be provided
5.1.2	What is the definition of “materially incorrect”? This is confusing as PD will be issued every hour. Clarify what is meant here in reference to “the previous PD schedule”?
5.1.3	Consider adding specificity related to these being locational prices, and/or Ontario zonal price etc...

5.8.2.13	What is the difference between “actual” and “forecast” in the context of PD
5.8.3	Consider adding “as per ...” in order to point to the part of the MR where this expansion request
6.1.2	“two minutes before” seems very precise. Consider making a more flexible statement.
6.2.1.2 6.2.1.3	6.2.1.3 is missing the “action” i.e., shall be set etc... as it is a distinct entry from 6.2.1.2
6.6.1.6	What is meant by “the total energy and operating reserve in real time schedules”?
6.6.2	Clarify with an example. This indicates a single set for 12 intervals rather than 12 runs. What is the exact application
6.6.2.4	What is meant by “total energy from such operating reserve”?
6.6.4	I don’t think “trading date” is a defined term, “trading day” is.
6.6.5	Can you elaborate on what this is. Will this be given on a participant resolution? What is the definition of “significant”. What is meant to “result of the real-time calculation”. Can you provide an example and discuss the frequency being at least once a month. What happens if there are no such instances in a given month?
6.7.1.1 6.7.1.2	What is meant by “for each dispatch interval”? Clarify that each 5 minutes will issue data for one interval at a time, rather than balance of intervals for the entire hour How often will “the schedule to provide contracted ancillary services” be issued
6.7.3 6.7.3.1 6.7.3.2	What “ancillary services” are included in 6.7.3.2?

7.1.1B1	Propose to add “issued a release notification for that resource ” as at a participant level there may be multiple release notifications for other resources.
7.1.6	Why was “best effort” notionall lowered to “reasonable effort”? Does the IESO expect a different level of ability to provide these advisories? If not, best effort should remain as the goal.
7.2.1	Same as above, “best effort” should be the aspirational standard. Also is “cosistent with” well defined? “Closely approximate” is more clear.
7.2.1A.3	“Failure of a resource to follow dispatch” is a very low bar to have the IESO not comply with 7.2.1. Propose language is added to qualify the subset of instances where not following dispatch by one resource would cause the IESO to not comply with 7.2.1
7.2.5	Same comment re “reasonable” vs “best effort”
7.2.5A 7.2.5A.1 7.2.5A.2 7.2.5A.3 7.2.5A.4 7.2.5A.6	<p>The original language stated that the IESO may issue instructions that depart from the pre-dispatch schedule.</p> <p>The new language states that the IESO doesn’t have to issue instrucionts altogether.</p> <p>That is a material difference and I don’t understand why the IESO wouldnd’t issue ANY instruction if, for example, a resource fails to follw dispatch instructions (7.2.5A.3) Consider reinstating original language.</p> <p>Aso clarify that this section applies only to “a boundary resource”</p>

7.2.5A.6	Isn't NISL violation respected in the calc engine? A bit surprised that a schedule would violate it in the first place.
7.3 7.3.1 7.3.1.1 7.3.1.2 7.3.1.3	7.1.1A captures dispatchable loads and as such section 7.3.1.2 is not accurate in terms of its reference to "additional energy production". See 7.4.2 Also consider rewording 7.3.1.3 replacing "same" with a more descriptive language.
7.3.4.2	Confirm boundary enetiry receive a ramp rate indication as described here.
7.4.2.1 7.4.6	Please comment on how 7.4.2.1 and 7.4.6 are related ensuring that there isn't overall over-collection as both of these items are reductions to revenues under the same condgition.
7.5.2	Currently there are two documents that speak to compliance with dispatch – an Interpretation Bulletin and a Statement of Approach. It will be much better if the IESO issues one, clear document outlining expectations and means of assessment (data source, meter type etc)
7.5.3	Applying language at the resource level, takes us further from the compliance aggregation model that allows for resources to meet dispatch at an aggregate level. Please comment on how compliance aggregation is contemplated here.
7.5.9	Is the appropriate unit of application the resource or the facility?
7.8 7.8.1	Is publicaiton of data adressed in another section?
8.3.1	Should state "determine and issue " if "issue" is a term

	covering instances when IESO shares confidential information with a market participant (see prior note).
8.4A.5.1 8.4A.5.2 8.4A.5.3 8.4A.5.4 8.4A.5.5	<p>It is unclear what priority would be used by the IESO to use one of more of these ways of Determining administered prices. It is also unclear why there are so many options.</p> <p>Will locational prices be consistent with the source as to how they were derived. Or different approach can be applied to each location? How can participants validate the approach used?</p>
8.4A.7	The IESO should add language in terms of determining and issuing Economic Operating Point and any other relevant information in accordance with a specified timeline (reference to 6 BD in 8.3.1)
9.2.1	Is the IESO expecting contracted ancillary services to be provided at a resource level (rather than a facility)?
9.4.5	<p>Why are DA MWPs included in the “not entitled” provision given that the reduction of active power is a real time phenomenon?</p> <p>Also what if the reduction is only partially causing the MWPs (as in there are other reasons why the MWP is being received). Suggest this language is updated to reflect only the MPWs that is associated with the event.</p>
10.1.7 10.1.7.1 10.1.7.2 10.1.7.3 10.1.7.4	It is unclear what constitutes a type of “failure to follow dispatch” in terms of materiality that would warrant the IESO to not issue a start up notice. Same comment was made previously in terms of clarity in regards to what

	constitutes significant instance of not following dispatch.
10.2.6.3	I can't tell if the 's' has been inadvertently deleted?
10.3.3 10.3.4	Could the IESO confirm that the use of different ways to specify the relevant resource (GOG-eligible vs Dispatchable Gen that is a non quick start and not Nuclear) is intentional. An example would be useful.
1.1.2.2B	"Intermittent generators" should be its own category and "any generator...." a new item Split into 11.1.2.2 and 11.1.2.3
11.1.1.2	"embedding facility" is not a defined term. Consider defining it for clarity.
11.2.1	<p>Please confirm that with the deletion of the two hour reference, a quick start resource would have NO obligation to notify the IESO as long as it received an instruction.</p> <p>Please describe how this will work from a timing perspective. If the first instruction is received at the top of the hour for example, the applicable resource may need to have already synchronized. Again, questioning the timing aspect of having the have acknowledged an instruction as a pre-condition to synchronize.</p> <p>Also in the context of "synchronize to ... embedding facility", is the notion of dispatch instruction (which indicates dispatchability) appropriate in the context of "embedded gen", which doesn't receive a dispatch?</p>
11.2.2A	What is a "proposed synchronization plan"?

	<p>Please expand on the significance of the plan and as to what that encompasses.</p>
11.2.4	<p>How is “receipt of the notification” established?</p> <p>Could you cross-reference the “any applicable provisions ... relating to over-generation dispatch”. It is important for generators to have a clear understanding as to when the IESO may require de-synch</p>
11.2.4A	<p>Should there be a corresponding section in the preceding section that specifies that a resource may request approval that will be conditional on 11.2.4A. This section speaks to an ability but it is unclear under what circumstances a participant may ask for such approval in the first place.</p>
11.2.6	<p>Whereas the synchronizaiton plan was limited to “non-quick start resources”, this section applies to all generators. Can you clarify how this applies to “quick-start”, preticualrly given the condition that getting an instrucion is sufficient to synchronize. Is there a synchronizaiton plan specific to a “quick start” resource? If not consider, revising and limiting to “non-quick start”</p>
11.3.1A	<p>Based on the definition of GOG-eligible resource, does it make sense to incldue “ or embedding facility”?</p> <p>Is there a significance of the pluralziaiton of “dispatch instructions” – does a resource have to receive at least two such instructions? Consider providing an example.</p>

11.3.2	Deleted language specified “at least one hour”, whereas new language is “one hour”. Clarify if “at least one hour” still applies and if not, what is the flexibility that must exist as participants won’t be able to notify exactly one hour in advance.
11.3.4	<p>Please clarify how this process will work for “quick start” resources. If the resource needs to notify five minutes in advance (see 11.3.1) and the IESO has 5 minutes to accept, then there is an obvious possibility that there will be lack of clarity by the time the resource needs to take action.</p> <p>Or, is 11.3.4 specific to non-quick start as it speaks to a “plan”. See comment on needing to define what such plan is. If the latter consider, limiting to the relevant resource.</p>
11.3.7	How does this work for “quick start” resources, given the 5 minute window? See comment above.
11.4 11.4.1	<p>There is a material difference between “de-synchronize” and “to not synchronize”</p> <p>Isn’t the IESO’s ability to request desynch for reliability already captured in other sections?</p> <p>Isn’t the “to not synchize” covered in the above sections which give the IESO the right to reject approval in all possible cases?</p> <p>As per above, I do not think this section is required unless it introduces a new case – please explain.</p>
	What is the definition of “energy capability of generation

	resource”. Is this different than the “generator capability” report which is an after the fact report?
12.1.1.6 A B C D E	What is the significance of the use of EPT in a. on days prior and EST in d. ? Is the “;”, supposed to be a “,”?
12.1.3.2	What is the significance of “or an advisory of the total MW of energy being directed to submit....” Seems there would be duplication of advisory notices – is that intentional?
12.2.1.1 12.2.2.1	Inconsistency of “to increase demand” as compared to “that will reduce demand”. Recommending to align. Also I don’t think the definition of “response” (italization of defined term) is what is captured in the Chapter 3 definition which is the basis of the defined term. Remove italization
13.2.4.4	Consider changing “implement” to “enact” or “execute”
13.5.1 13.1.1	I don’t see “market operations” as a defined term in Ch 11. Therefore the deletion in 13.1.1 is inappropriate as it leaves the term undefined.
13.6.2	Given the locational nature of the prices, will the IESO also validate revenue sufficiency as it relates to instances when these prices are not sufficient to cover participant costs at a locational level. (see comment re: locational nature of administered prices)

19.9A.1.2	Correct font size
21.4.2	<p>Italysize “offer” in i)</p> <p>Could you clarify if non complinace with 21.4.2 will result in further action than the forgoing of DA and RT MWP’s described in 21.4.3</p>

Chapter 8 – Sent July 15, 2024	
2.0.1	The language here squarely puts this on “software inadequacies” and in my understanding compels the IESO to corrects these. This is a different than the explanation relating to underutilization and little value of PBCs. Please confirm the intent when it comes to PBCs
A	Remove italics for the “a” in “and”
2.1.3.1 2.1.3.2	Confirm if the application is hour, interval or both and align language.
3.6.1	“All settlement hours” should be time bound by some qualifier - e.g., “in an auction”, “applicable” etc..
4.10.3	I understand the removal of this language. But am curious if additional language is required to navigate through market renewal. Is the first short term auction in the new market, for example, held on May 1 to May 15 given a MRP implementation date of May 1? In other words is there a need to define the start of the new process following the “market transition date” as in 4.12.1
3.12.1.3	With the removal of “hour flows”, there is no clarity on the unit of disclosure. Will the energy scheduled for injection or withdrawal be an hour quantity?

3.13.10	See comment on applicability of “facsimile” in other sections of the market rules. Is this removal of such means of communication extending to other sections?
3.19.2 From chapter 9 3.8.2 <u>the transmission right settlement credit settlement amount, in settlement hour ‘h’ (“DAM_NECR_h”) shall be calculated as follows:</u> $DAM_NECR_h = \sum_K^I [(DAM_QSW_{k,h}^I - DAM_QSI_{k,h}^I) \times DAM_PEC_h^I] - \sum_K [TRSC_{k,h}]$	<p>There is some difficulty in following the cross references between Ch 7 and 9 in terms of how the TR process will take place.</p> <p>For example, is the” amount of the day-ahead market net external congestion residual” in 3.8.2 parallel to the process described in 4.19.2? If it is, it should be cross-referenced.</p>

Chapter 9 – Partial Sent July 15, 2024	
2.1.4	Is the replacement of facility with resource appropriate as a facility and its relationship to RWMs is different at that level vs. the resource level. There may be multiple resources for each facility.
2.2.6	“Connection station service” is a defined term whereas “connection service” isn’t. Confirm the appropriateness of the deletion of the word “station”
2.9.12.2	I am not convinced the addition of the word “uplift” is appropriate. “Hourly uplift” is a defined, term but the word “uplift” isn’t. On the IESO website, there is a distinction between uplifts and the IESO fee for example. The additional word “uplift” therefore may change and limit the AQEW settlements amount included in the reimbursement as compared to in today’s market.
2.4.6 2.4.6.1 2.4.6.2	Trying to understand the use of ‘m’, ‘c’ and ‘s’ which are referred to as “locations” in 2.4.6 and then as

	<p>“registered wholesale meters” in 2.5.2.</p> <p>Similarly in 2.4.6 there is a reference to a facility “k/m”, “k/c” and “k/s” whereas in 2.5.2 the reference is to a resource using a different location of the ‘ – ‘k’/’m’ ...etc.</p> <p>Are these the same or the meaning is dependent on the use?</p>
2.13 2.13.1	How will the IESO determine eligibility in the context of this provision? Was there a comparable provision in the current market?
2.14.2 A B	Confirm the IESO can indeed determine ALL of the real-time market settlement data using only real-time data.
A	Lower case “C” in commencement
A 6.8 6.8.1	I am not sure of the appropriateness of the reference to “in accordance with section 6.8”, because section 6.8 itself limits the timelines with subsections that do not include B1.2 (see 6.8.1)
B	Market transition completion date is not a defined term. Remove italicization of “date”.
<u>For greater certainty, this provision does not alter the timelines set out in section 6.3.3, and following the operation of section (b), the relevant timelines will return to as they are stated in section 6.3.14.</u>	Not sure what “operation of section (b)” means. Consider re-wording.
2.5.1 2.5.1.1 2.5.1.2	I am bit uncertain if it is appropriate to define the metering point by talking about arithmetic manipulation of metering data. I think there has to be more clarity as to what the point is and then some additional language that explains that the reading at such points are adjusted in order to represent metering data as if

	obtained at the point. Consider changing and clarifying further.
2.5.2	Is the first reference to “registered wholesale meter” intentional? If so, how is it different than the registered wholesale meter ‘m’, ‘c’ or ‘s’ – I also don’t see instances of wholesale meter “c” or “s”
2.10.1	What is the “any other information” contemplated here?
2.11.4	Why is the qualifier “practicable” added here? The settlement data is key for participants to shadow settle. I do not think it is a good practice to add undefined terms that allow the IESO to delay sending the data for unclear reasons. I do not support the added language.
2.14.1	Can the IESO confirm that the admin prices (given that they are not locational and seem to be subject to a different more complex process) will be available in time for the calculation of the PS. If not clarify how and when participants can expect settlement based on Admin prices.
3.1.6	I have made this point previously in regards to AQEI, which has the ‘t’ subscript indicating it’s an interval reading. Dividing by 12 in my mind is not appropriate. The hourly (only h subscript) terms need to be divided by 12 precisely because it’s an hourly quantity that needs to be represented at the interval level,
3.1.1 3.1.6	Re: “for each settlement hour ...” Can the IESO clarify what resolution will participants receive their itemized settlement file at - an interval or an hourly resolution? The current AQEI based settlement and associated data files is provided at an interval resolution. Is this changing? If so, how will participants assess accuracy at

	the interval level for their metering data?
3.1.6	<p>Why is HPTSA presented as one term? A delivery point and an intertie point are distinct in nature and are applied at the resource level, not the participant level.</p> <p>Similar to the question above, why aren't these formulas presented in a manner consistent with how they will appear on settlement statements. For extra clarity, separate formulas for delivery points and intertie metering points will make comprehension easier.</p>
3.2.2 3.2.3	LFDA should be defined ("LFDA") the first time it appears.
3.10.4	
5.1.1.4	"generator offer" is not a defined term, so it's unclear what this means.
5.1.2.1	Defining terms within the chapter makes cross referencing to Ch 11 difficult. Consider defining in Ch11 if this will be used elsewhere.
	I don't see a definition or an explanation the abbreviation of EMFC either in Ch9 or Ch9 Appendix. The terms is used frequently but is unclear as to what it stands for.
i.	I find this type of definition inconsistent with other definitions that state "for participant k, for interval t..." etc. Here MAX_CAP is defined without any reference to time or unit of application which makes this definition not as good as it can be
i.	<p>Missing an "is"</p> <p>A am also unclear as to what happens if the bid price is not at the MMCP? Is there an assumption that there will be a quantity with an associated MMCP price. Please clarify.</p>

3.3.2 3.3.2.1 3.3.2.2 A B	How is “is activated for operating reserve” defined. How many intervals post activation will fall in this category?
3.3.3.2	<p>It is very difficult to understand the intent based on formulas alone. Why did the IESO not capture the intent in words as well as formulas</p> <p>Also none of the subscripts are defined here</p>
A B	Inconsistent use of [and (in these two formulas
$DAM_BCE_{k,h}^{l,t} = \max\left\{0, \sum_{i=1}^T OP(RT_LMP_h^{l,t}, \min(RT_LOC_EOP_{k,h}^{l,t}, DAM_QSI_{k,h}^{l,t}), BE_{k,h}^{l,t}) - OP(RT_LMP_h^{l,t}, SQEI_{k,h}^{l,t}, BE_{k,h}^{l,t})\right\} / 12$	<p>Inconsistent use of [and { in formulas.</p> <p>Also inconsistency of formatting]\of Min and MAX</p>
3.3.5.1 3.3.5.2	<p>What is the “applicable LMP” in this context?</p> <p>Also for multiple PQ pairs, are all offers that are “less than...” adjusted to be the LMP. Please clarify.</p>
3.4 3.4.1 3.4.1.1 3.4.1.2	<p>3.4.1 refers to dispatchable generator resources, whereas 3.4.1.2 refers to hydroelectric generation resources, without qualification as dispatchable.</p> <p>It is also unclear what does it mean for a schedule to be greater than an economic operating point as the term economic operating point is not defined and it also is not present anywhere else in this chapter (in those words)</p>
3.4.3.1	<p>This section is difficult to process. Assuming this means that an offer price (which may already be a substitution) that is less than \$0 will be adjusted.</p> <p>I am not clear on what is meant by “ii the applicable DA LMP – can’t tell what it’s in reference to nor</p>

	<p>what will be changed to the lower of 0 and the DA LMP. I assume the LMP can't change but it doesn't read that way. Please clarify</p>
3.4.4.1	<p>What is the rationale to exclude hours where the schedule is less than MLP. Is that assuming recovery will take place via 3 part offers (Start Cost). Confirm DSO will not schedule in a way where recovery will not take place based on this condition.</p>
3.4.4.2 A B	<p>Why is this qualified as "called for a generation resource or dispatchable resource" – based on the definition a called capacity resource has been called.</p> <p>If there is a temporal condition (called prior to receiving a schedule) define what it means to be called.</p> <p>What will be the visibility of "when the IESO restricts a transaction"? will the IESO publish a report to that effect?</p>
3.4.4.3 3.4.4.4	<p>Use consistent terminology "during any settlement hourS" and "for any settlement hour".</p> <p>Clarify what does it mean "receives a minimum hourly output" – is that in reference to its schedule?</p> <p>Clarify what does it mean to "receive an hourly must run binding constraint" – how will a participant know if this condition is met.</p>
3.4.4.5	<p>Confirm if such resources bid a cent less than MMCP then this condition doesn't apply? What is the logic for this condition as drafted?</p>
3.4.4.6	<p>Is "not operating as a pseudo-unit in hours in which they have a</p>

	<p>minimum constraint” a condition that will be known by participants?</p> <p>What is the definition of “minimum constraint” as it’s not a defined term?</p> <p>What does it mean to be “consistent with combusting turbine commitment” and is the lack of reference to “steam turbine” (as mentioned in the first part of the definition) intentional?</p>
<p>3.4.5</p> <p>3.4.5.1</p>	<p>In previous section “and” was used instead of “or” – make consistent.</p> <p>Is there a more formal definition of “hydroelectric generator resources that are not registered on the same forebay as one or more other hydroelectric resources” - may benefit from a definition in Ch11 if this concept is used elsewhere.</p> <p>Change “resource” to “resources” to be consistent.</p> <p>How will the comparison of sum of the quantity of energy scheduled (is that a clear term) and its Min DEL be executed? Will a participant be able to verify such comparison.</p>
<p>3.4.5.2</p>	<p>Is “the minimum daily energy limit of such forebay” well defined?</p> <p>I assume the resources have to belong to the same participant?</p> <p>What is the logic that MWPs don’t apply if the total schedule is at Min DEL. How does this ensure payment sufficiency at the resource level? Please clarify</p>
<p>3.4.6</p>	<p>Does “determined” mean calculated and applied – as in eligible</p>

3.4.7	<p>This should also say for participant 'k' for hour 'h'.</p> <p>Having said that, I am still not clear why this is presented by participant, rather than resource</p>
A B	<p>What is "R" in b. in terms of the summation. All types of OR?</p> <p>Why is the MWP presented as one calculation for both energy and OR? Will these not have separate charge codes, allowing participants to separate the two (the four if we look at three classes of OR)?</p>
A B 3.4.8 A B	<p>Please confirm the appropriateness of the -1x application for these terms.</p>
3.4.10 A B	<p>Why is this presented as a b., rather than in 3.4.10 as in the other sections.</p>
A B	<p>I don't understand what a. means – is it a Boolean 1/0 if the number is equal to max starts per day or the actual number when that is the case. In any case, I think there is an "if" missing.</p> <p>Similarly for b., is this a Boolean number based on "either" or "hydroelectric resource has not submitted". If so there is an "if" missing. Please clarify</p>
B i. ii. iii.	<p>IF 'f' is a set, how is that applied in FROP, which has no summation over the set. Please clarify.</p>
3.4.13.3 A	<p>The use of Not Attained Max Starts is unclear – is it Not "Attained Max Starts" or "Not Attained Max Starts" – if the latter is that a Boolean or a number.</p>
C	<p>What does it mean to be "not within a start event" ?</p>

3.4.13.4	Where is the concept of s as a number if hours explained in a market manual. Is there assurance that s is not overlapping with the rest of the formulas for h.
3.4.13.5.3 A	Is all of this to ensure participants will only receive a positive MWP rather than some other reason related to eligibility
General question regarding SEAL	<p>Could the IESO explain the justification to not have “the payment for these settlements ... not paid out”.</p> <p>The current process evaluates the appropriateness of CMSCs in relation to incurred costs and participants are able to engage in discussions on appropriateness of costs based on actuals.</p> <p>Why isn’t the current process carried through?</p> <p>Has the IESO assessed impact of this change?</p>

Chapter 10	
6.1.3.2	Does transmission delivery point need its own definition or is the definition of “delivery point” applied to transmission in a consistent way?