

Feedback Form

Market Renewal Implementation – Market Power Mitigation and Replacement of Settlement System – July 21, 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.

Market Manual 14.1 – Market Power Mitigation Procedures

Section / Topic	Feedback
5.6.1	<ol style="list-style-type: none">1. OPG recommends that in the case that the Market Control Entity (MCE) for physical withholding is not the same as the Market Participant (MP), the IESO should report the first notice of physical withholding to both the MP and the MCE.2. Grouping – The first paragraph under the grouping condition indicated that the IESO will evaluate resources that failed the physical withholding conduct test and share a MCE as a group for impact test simulation, regardless of location. This grouping criteria is unreasonable if resources are geographically distinct and distant from each other.
5.6.2	How would the IESO address the situation where a quick-start resource is not in normal operation mode (i.e. producing electricity) or is not synced to the grid, and therefore cannot offer certain classes of operating reserve?

Market Manual 14.2

Section / Topic	Feedback
3.5.1	<ol style="list-style-type: none">1. Is the IESO FORM [*] a placeholder?2. When would the IESO FORM [*] be available for stakeholder review?
7.2.5.2	Within a hydroelectric cascade, there are energy offer reference level adders (\$X and \$Y) for downstream stations to ensure that resources at the top of the cascade group will appear less expensive than downstream resources. How are these adders calculated?

General Comments/Feedback

For the **Replacement of Settlement Systems (RSS)**, OPG requests the IESO to incorporate all RSS changes into the Market Renewal Program (MRP) solution in the upcoming MRP Settlement documents release, so that Market Participants can review and confirm RSS requirements implemented for November 1, 2022 remain consistent with MRP specifications.

OPG would like to thank the IESO for continued stakeholder engagement on Market Renewal Implementation and appreciates the ongoing opportunities to provide feedback.