

# Market Renewal Program Feedback Form

## Market Renewal Implementation – Draft Market Settlements, Metering and Billing Market Rules and Market Manuals – December 1, 2022

### Feedback Provided by:

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Date: March 3, 2023

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

Following publication on December 1, 2022 the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the draft Market Settlements, Metering and Billing batch of Market Rules and Market Manuals amendments. The draft documents can be accessed from the [Implementation Phase documents webpage](#). Additionally, materials for the December 14, 2022 webinar where the IESO will provide an overview of the documents and will be posted to the [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by February 21, 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 6: Energy – Revenue Meter Registration

What feedback do you have on the Chapter 6: Energy – Revenue Meter Registration 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: Hydroelectric Resources – Optional Registration Requirements

What feedback do you have on the Chapter 7: Hydroelectric Resources – Optional Registration Requirements draft market rule amendments?

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

## Market Rules – Chapter 8: Physical Bilateral Contracts and Financial Markets

What feedback do you have on Chapter 8: Physical Bilateral Contracts and Financial Markets draft market rule amendments?

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

## Market Rules – Chapter 9: Market Settlements, Market Billing and Funds Administration

What feedback do you have on the Chapter 9: Market Settlements, Market Billing and Funds Administration draft market rule amendments?

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

## Market Rules – Chapter 9: Appendices

What feedback do you have on the Chapter 9: Appendices?

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

## Market Rules – Chapter 11: Definitions

What feedback do you have on the Defined Terms?

Section / Topic	Feedback
Broad Constrained Area (BCA)	The term Broad Constrained Area is referenced in the MRP Design Documents and in materials provided in the December 2022 & January 2023 Engagement Webinars. However, the term is not defined in Chapter 11 nor is it listed in section 22.10 of Chapter 7 - Designation of Constrained Areas. However, the term BCA is found in section 5 of Chapter 9. Can the IESO confirm if this is intentional and provide an explanation?

## Market Manual 1.5

What feedback do you have on draft Market Manual 1.5?

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

## Market Manual 4.4

What feedback do you have on draft Market Manual 4.4?

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

## Market Manual 5.3

What feedback do you have on draft Market Manual 5.3?

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

## Market Manual 5.5

What feedback do you have on draft Market Manual 5.5?

Section / Topic	Feedback
Changes to Reference Levels	<p>A resource may request for a temporary revision to the fuel cost component of a reference level for a resource provided that supporting documentation(s) are submitted to the IESO to substantiate the request. Section 5.2.1 of MM 14.2 outlines a list of acceptable documentation.</p> <p>Fuel invoices will not be available until 10 business days after the end of the settlement month and as such, fuel invoices cannot be utilized to support a request. Over the counter fuel procurement are typically conducted over Instant Messaging (“IM”) or via text messages.</p> <p>Can the IESO confirm if copies of quotes or firm purchases with gas marketers via IM or text are acceptable documentation?</p> <p>To the extent that firm gas transportation services are limited or have been fully utilized for the dispatch day, a resource has the following options to fuel the resource:</p> <ul style="list-style-type: none"> <li>(i) procure (a) interruptible transportation services to deliver fuel to the resource at an incremental cost, plus (b) the gas commodity costs; or</li> <li>(ii) incur balancing or other fees from its distribution company to consume gas not delivered but supplied by the distribution company.</li> </ul> <p>Can the IESO confirm if the costs outlined above are acceptable for a reference level change?</p>

Section / Topic	Feedback
Alternative Reference Quantity Value	<p>Section 5.8 of MM 14.1 outlines a list of acceptable documentation to substantiate a request to use alternative reference quantity value including copies of planned and forced outages and equipment de-ratings.</p> <p>Can the IESO confirm if a resource is expected to re-submit the same planned and forced outages/derate information submitted through the IESO's CROW outage system or will the revised Reference Quantity Value be automatically populated into the IESO Market Power Mitigation process/system?</p>
Designated Constrained Areas	<p>Based on the materials provided in the December 2022 &amp; January 2023 Engagement Webinars (slide 16 of the Market Power Mitigation (Part 2 of 3) presentation), it appears that it is possible for a resource to have multiple designation of constrained areas for a single dispatch day.</p> <p>Can the IESO please confirm if this scenario is possible?</p>
DAM Balancing Credit	<p>Per section 2.4.1 of MM 5.5 and section 3.3 of Chapter 9, the IESO may dispatch a GOG-eligible resource to a quantity less than DA schedule for reliability reasons and a resource would be eligible for a DAM balancing credit settlement amount.</p> <p>Presumably this will be triggered manually by the IESO control room operators. How will the settlement system identify this IESO initiated event?</p>

## General Comments/Feedback

Settlement Systems: The introduction of the two-settlement system (DAM & RTM) and the Market Power Mitigation process introduces (i) significant volumes of data to be collected/stored, and (ii) an overwhelming amount of complex calculations of settlement charges to implement and reconcile. Atura would like support from the IESO in the Sandbox environment to confirm the settlement charges and ensure the settlement system is developed accurately prior to production.