

# Market Renewal Program Feedback Form

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

### 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.

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
General	<ol style="list-style-type: none"><li>1. There is inconsistency with the section reference format used, i.e., "ss.x" vs "s.x" in the Market Rules chapters. OPG recommends alignment to one reference format for Market Rules Chapters 6 to 9.</li><li>2. The section reference format within this chapter is not consistent with reference format of s.x/ss.x, e.g., "section 2.1.5" in Section 2.1.1. OPG recommends updating throughout chapter for alignment.</li></ol>
Sections 10.3.2, 1.1A.1.5, 1.5.1.5	<p>OPG recommends aligning the replacement text within the three deleted sections, and with the text in Sections 10.3.2.1 and 10.3.2.2:</p> <ol style="list-style-type: none"><li>1. Section 10.3.2 has been replaced with "[Section deleted – intentionally left blank]".</li><li>2. Sections 1.1A.1.5 and 1.5.1.5 have been replaced with "[Intentionally left blank – section deleted]".</li></ol>
Section 1.5.1.4	OPG recommends removing the reference to Section 1.5.1.5, as it is a deleted section.

## 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
	No comment.

## 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
General	The Market Rules section reference format in this chapter is not consistent with reference format of s.x/ss.x, e.g., "section 2.1.23.1" in Section 2.1.3.1. OPG recommends updating throughout chapter for alignment.

Section / Topic	Feedback
Section 3.8.6	The format for the Market Rules chapter references in the subsections is not consistent with the format of MR Ch.x.
Section 3.12.1.1	The format for the Market Rules chapter references in the section is not consistent with the format of MR Ch.x App.x.
Section 3.16.3	Suggest italicizing "business day".
Section 3.18.1	The format for the Market Rules section references in the subsections is not consistent with format of s.x used in Section 3.18.1.1.
Section 3.20.4	OPG recommends renumbering the sub-sections from "3.20.2.x" to "3.20.4.x" to align with the revision in the section numbering.

## 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
General	<ol style="list-style-type: none"> <li>1. The section reference format within this chapter is not consistent with reference format of s.x/ss.x, e.g., "section 2.1.1A2" in Section 2.1.1. Suggest updating throughout chapter for alignment.</li> <li>2. There is inconsistency with the section reference format used, i.e., "s.x" vs "ss.x". Suggest alignment to the same section reference format.</li> <li>3. There is a comma between "MR Ch.x, s.x" within some sections, which is inconsistent with the set reference formatting for Market Rule chapter and section, i.e., "MR Ch.x s.x".</li> </ol>

## Market Rules – Chapter 9: Appendices

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

Section / Topic	Feedback
General	The section reference format within this chapter is not consistent with reference format of s.x/ss.x, e.g., "section 2.4" in Section 1.3.2. Suggest updating throughout chapter for alignment.

## Market Rules – Chapter 11: Definitions

What feedback do you have on the Defined Terms?

Section / Topic	Feedback
General	<ol style="list-style-type: none"><li>1. There is an extra space in some instances of Market Rules chapter and section references within the definitions, i.e., "s. x" and "Ch. x".</li><li>2. Please ensure alignment of the section references between the Market Rules and Market Manuals, i.e., "s.x" vs "ss.x".</li></ol>

## Market Manual 1.5

What feedback do you have on draft Market Manual 1.5?

Section / Topic	Feedback
Conventions	<p>There appears to be a double space between ' and ( in the sentences in the red-lined version of the draft Market Manual 1.5:</p> <ol style="list-style-type: none"><li>1. "...representative format: 'MR Ch.1 ss.1.1-1.2' (i.e. market..."</li><li>2. "...representative format: 'MM1.5 ss.1.1-1.2' (i.e. market..."</li></ol>
Section 2.2.4	The RAN acronym is not defined in its first mention in the market manual.
Section 3.3.4.2	The acronym MLP has been previously defined in Section 3.3.3.3, suggest to remove "minimum loading point" from the first sentence of Section 3.3.4.2 and replace with the MLP acronym.
Section 3.6.1	OPG suggests a space between in the highlighted term "...generation <b>resources</b> dispatchable non-quick start generation facilities..."
List of Acronyms	<p>Editorial suggestions:</p> <ol style="list-style-type: none"><li>1. CAA is only used once in the market manual, suggest removal from this list;</li><li>2. Suggest including NERC in the list.</li></ol>
General	<ol style="list-style-type: none"><li>1. There is inconsistency with the use of "ss.x" and "s.x" in the market rules and market manuals references in Market Manuals 1.5, 4.4, 5.3 and 5.5, i.e., mixed use of "ss" and "s" within the documents. OPG suggests convention alignment for the four market manuals for consistency.</li><li>2. Market Manuals 1.5 and 5.5 have a "Conventions" section, while Market Manuals 4.4 and 5.3 have a "Market Manual Conventions" section. Suggest alignment for consistency.</li></ol>

## Market Manual 4.4

What feedback do you have on draft Market Manual 4.4?

Section / Topic	Feedback
Document Change History	Issue 22.0 dated September 15, 2021 is revised to Issue 61.0. Should the revision be referencing Issue 21.1, in alignment with Baseline 46.0?
Market Manual Conventions	There appears to be a double space between ' and ( in the sentences in the red-lined version of the draft Market Manual 4.4: <ol style="list-style-type: none"> <li>"...representative format: 'MR Ch.1 ss.1.1-1.2' (i.e. market..."</li> <li>"...representative format: 'MM1.5 ss.1.1-1.2' (i.e. market..."</li> </ol>
Market Manual Conventions	OPG suggests replacement of "in" with "and" in: "Terms and acronyms used in this market manual <b>in</b> its appended documents..."
Section 1.2	The underscore symbol is used in the market manual title, is this intentional? <ul style="list-style-type: none"> <li>"...MM 5.8: Settlement Invoicing."</li> </ul>
Section 1.2 and 4.2	<ol style="list-style-type: none"> <li>The Market Manual 5.5 title within the two sections ("Settlement Amounts Associated with the IESO Administered Markets") does not match the Market Manual 5.5 title in the Market Settlements, Metering and Billing Batch release ("IESO-Administered Markets Settlement Amounts").</li> <li>For Section 4.2, the reference to Market Manual 5.5 is missing in "...the <i>physical markets settlement statement</i> process detailed in Settlement Amounts Associated with the IESO-Administered Markets." The market manual title is bolded, which is inconsistent with the formatting of the market manual titles in other sections.</li> </ol>
Appendix B	OPG suggests that multiple market rules references to reside within a single set of brackets for format alignment with other sections in the market manual, e.g.: <ul style="list-style-type: none"> <li>(MR Ch.8 s.3.7.2)(MR Ch.8 s.3.12.1.5) to (MR Ch.8 ss.3.7.2 and 3.12.1.5).</li> </ul>
Appendix E	OPG suggests to include specific references mentioned in the section body in the reference section, and delete sections that are not mentioned: <ul style="list-style-type: none"> <li>(MR Ch.8 ss.3.16.1.1 – 3.16.1.4 and 3.16.3.1 – 3.16.3.4) vs (MR Ch.8 s.3.16.1 and MR Ch 8 s.3.16.3).</li> </ul>
Appendix G, Table G-1	Editorial suggestions for descriptions: "...MR <b>Ch8</b> . Ss3.8. <b>1.For</b> all amounts...": <ol style="list-style-type: none"> <li>"Ch8." to "Ch.8";</li> <li>"1.For" to "1. For".</li> </ol>

Section / Topic	Feedback
List of Acronyms	<p>Editorial suggestions:</p> <ol style="list-style-type: none"> <li>1. LMP is not used in the market manual, suggest deleting from the list;</li> <li>2. TTC is only used once in the market manual, suggest deleting from the list.</li> </ol>

## Market Manual 5.3

What feedback do you have on draft Market Manual 5.3?

Section / Topic	Feedback
Table of Changes	<ol style="list-style-type: none"> <li>1. Suggest adding in punctuation after: <ol style="list-style-type: none"> <li>a. "Market Settlements &amp; Metering"</li> <li>b. "Market Billing and Funds Administration"</li> </ol> </li> <li>2. What is "Document name change" in reference to?</li> <li>3. There is reference to the "Market Settlements &amp; Metering" Detailed Design document, however, the detailed design document is titled "Market Settlement". Recommend revising for alignment.</li> </ol>
Section 1.2	OPG suggests listing the market rules sections in numeric order and include section headings for clarity.
List of Acronyms	The two acronyms in this list are not used in the market manual, this section can be deleted.

## Market Manual 5.5

What feedback do you have on draft Market Manual 5.5?

Section / Topic	Feedback
Section 1.2	OPG suggests alignment for market rules reference format ("ss.x" vs "s.x") and the use of sections headings for all Market Rules sections in the list.

Section / Topic	Feedback
Section 2.0	<p>Editorial suggestions within this section:</p> <ol style="list-style-type: none"> <li>1. Italicize defined term in "Day-ahead market settlement includes <i>settlement amounts</i> for <i>energy</i>..."</li> <li>2. Italicize defined term in "Real-time balancing settlement includes <i>settlement amounts</i> that can be..."</li> <li>3. Remove the acronym from the section headings of Sections 2.1.1, 2.1.2, 2.1.3 and 2.3, as the acronyms are defined in the body;</li> <li>4. Remove italicization in "<i>day-ahead market settlement of physical bilateral contracts (PBCs) (HPTSA_PBC{1}); and</i>";</li> <li>5. Remove italicization in "...is less than the <i>market participant's day-ahead schedule</i>."</li> </ol>
Section 2.13, Table 2-21	There is an extra line break in the second row, second column cell.
Section 4.4	OPG suggests adding in a semi-colon after each bullet point in the settlement amount listing.

## General Comments/Feedback