

Stakeholder Feedback Form: MRP Energy Detailed Design

Design Document: Publishing and Reporting

Date Submitted: 2020/05/21

Feedback Due: May 21, 2020

Feedback provided by:

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The IESO is posting a series of detailed design documents which together comprise the detailed design of the MRP energy stream.

This design document is posted to the following engagement webpage: <http://ieso.ca/en/Market-Renewal/Energy-Stream-Designs/Detailed-Design>.

Stakeholder feedback for this design document is due on **May 21, 2020** to engagement@ieso.ca.

Please let us know if you have any questions.

IESO Engagement

General feedback on the Detailed Design Document

Capital Power appreciates both the IESO's efforts to capture planned changes to its market reporting processes, and the opportunity to provide the following comments on the Publishing and Reporting Detailed Design Document (the "Document").

- In order to undertake a full review of the proposed changes, stakeholders should have an opportunity to consider the Document in the context of all Energy Stream Detailed Design Documents, some of which have not yet been released. In order to undertake a full and effective review of the changes to publishing and reporting practices, stakeholders require an opportunity to consider the changes in the context of all Energy Stream Detailed Design features. This will only be possible once the full scope of the Energy Stream Detailed Design has been communicated to stakeholders. In order to facilitate the effective stakeholder review, the IESO should continue to provide opportunities for stakeholders to comment on the Document (and all Detailed Design features) as the full scope of Energy Stream Detailed Design continues to be communicated.
- Review of Publishing and Reporting of Market Information should be undertaken alongside a review of the Information Confidentiality Catalogue. Decisions regarding whether and when market information should be made available to stakeholders are decisions that are core to the principle of transparency. With consideration to the scope of changes being undertaken as part of MRP and the IESO's commitment to the principle of transparency, an effective review of future market reporting practices requires first an assessment of how the information should be classified in the IESO Confidentiality Catalogue. This review should seek to assure the IESO and stakeholders that information being reported has been correctly classified in accordance with the requirements set out in Market Rules, specifically but not limited to Chapter 1, section 4 and Chapter 3, section 5.4.4.1 of the Market Rules. Because it is not yet clear how the IESO will address revenue streams for capacity (*i.e.* the "missing money problem") if contracts are not extended the classification of information will need to be reviewed again to ensure that publication and reporting practices are being undertaken in accordance with the Market Rules.
- Increased transparency and reporting is required where it relates to transmission outages and transmission constraints affecting LMP settlements and Market Power Mitigation. As the IESO is moving to an LMP settlement model under MRP, it will be important for participants to be kept informed with the most relevant and up-to-date information as possible with respect to transmission outages and constraints that will affect the locational calculation of Day-Ahead, Predispatch and RT prices in the province.
- The publication and reporting of market information needs to be supported by the IESO Market Rules and the Document should link every IESO report and publication to the Market Rule or Market Manual mandating its publication.

Comments on Design Document Section 1 Introduction

Comment: See General Comments. The confidentiality classification of new and existing information needs to first be reviewed in order to assess whether or not it should be provided to market participants in public reports.

Comments on Design Document Section 2 Summary of Current and Future State

See above.

Comments on Design Document Section Functional Design

3.3 Reports by Category

- Capital Power appreciates the organization of this section.
- As discussed in our General Comments, stakeholders should have opportunities to provide ongoing review and comment as forthcoming Detailed Design Documents are made available.

Comments on Design Document Section Market Rule Requirements

- In addition to specific Market Rules that have been identified by the IESO, decisions regarding the timing and content of market reports should be guided by Chapter 1, section 4 and Chapter 3, section 5 of the IESO Market Rules.
- Where the IESO has identified either a new or ongoing requirement to provide market information, that requirement should be explicitly linked to the corresponding Market Rule.

Comments on Design Document Section Procedural Requirements

No additional comment.

Comments on Design Document Section Business Process and Information Flow Overview

No additional comment.