

IESO Response to Feedback on the MRP Energy Detailed Design Document: Publishing and Reporting Market Information



ID #	Organization (stakeholder)	Stakeholder Feedback	IESO Response
1	OPG	OPG suggests that the IESO investigate the need to provide reporting related to “balancing congestion”, i.e. where there are differences in Tx congestion in the real time market as compared to the day ahead market. PJM provides a variety of reports related to balancing congestion, and charges associated with it.	Balancing Congestion will be reported as Congestion Rent and Loss Residuals as described in Section 3.7.14 of Market Settlement Detail Design Issue 1.0.
2	OPG	OPG highly encourages that the IESO allow participants to review this document again once all the remaining detailed design documents are released. As participants review the details of Market Power Mitigation, Day Ahead, PD & RT Calculation Engine etc... there may be additional comments/feedback that may be required for Publishing and Reporting Document, such as reports participants would like to see that haven't been included, or reports that need further clarification within them.	As discussed in the engagement forums, if there is a need to add additional comments because of new information or considerations, stakeholders will have the opportunity to provide additional feedback on any of the Detailed Design documents once they have all been posted.
3	OPG	Comment #1 – Figures 2-1 & 2-2 Additional clarity would be beneficial for Figures 2-1 and 2-2. Specifically in Figure 2-2, the flowchart shows that inputs/parameters can only be changed in pre-dispatch and do not show if they can be changed in real-time.	Thank you for your input. We will address this in v2.0 of P&R document.
4	OPG	Comment #2 – Figure 3-1 and Section 3.3 Figure 3-1 and the report tables in Section 3.3 do not provide the specific publishing timelines/frequencies. OPG recommends that the IESO add to Figure 3-1 (or include in a new table) specific details regarding the timing and frequency of publishing of all reports in the new market. A diagram highlighting specific times would be beneficial to market participants.	Figure 3-1 is intended to indicate the timeframe when reports will be published (e.g. pre-dispatch day, dispatch hour, etc.). More precise details will be a part of the subsequent phases of MRP.
5	OPG	OPG would also like to comment on the consistency/accuracy of the categorizations in Figure 3-1. For example, why are Transmission Reports (Transmission Rights Auction Reports) listed in Post-market only but not in Pre-market? Wouldn't there be Transmission Rights Auction Reports in the Pre-market as well?	Thank you for your feedback. This input will be incorporated into the Publishing and Reporting design document and included as part of the final detailed design document.
6	OPG	Comment #3 - General Comment on Tables: The report tables in Section 3 only provide high-level description of the new and modified reports under market renewal. OPG recommends that the IESO also provide samples/examples of all new and/or modified reports to give stakeholders the precise layout. Even sample headers, tables would be beneficial to include in the Reference column.	This will be brought forward for consideration during the Implementation Phase.

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7	OPG	<p>Comment #4 – Section 3.3.1</p> <p>OPG’s understanding is that adequacy reports are going to include information on virtual transactions at the zonal level. OPG suggests that these reports also include information on loads and generation aggregated at the zonal level. OPG believes that in order for participants to adequately manage their assets (generation or loads) in a SSM market with LMPs, it would be beneficial for the IESO to be transparent and indicate available generation and loads at the zonal level. Providing as much detail as possible on a zonal level will help participants in terms of forecasting and planning usage of their assets.</p>	<p>The IESO has not yet determined the revised layout of the adequacy report. These details will be established during Implementation phase in consultation with external stakeholders.</p>
8	OPG	<p>Comment #5 – Section 3.3.2</p> <p>OPG would like to know how initial proxy prudential requirements will be defined at market opening (i.e. during transition from old to new market).</p>	<p>The IESO will determine energy prices for calculating physical transaction prudential support obligation and virtual transaction prudential support obligation using the methodologies proposed in the Prudential detailed design document. The IESO will determine these prices and their impact to a market participants prudential support obligation prior to go live. The market participants will be given sufficient time to adjust their physical prudential support and post their virtual prudential support as required.</p>
9	OPG	<p>Comment #6 – Table 3-3, Report #2</p> <p>OPG would prefer that the following reports be published earlier than 10:00 EPT, if possible, so that they can be used by market participants to inform day-ahead offer strategy (ideally at 6:00 EPT):</p> <ul style="list-style-type: none"> • Table 3-3, Report #2 • Table 3.3 Report #3 <p>OPG and other participants have large amounts of inputs that will need to be factored into our day-ahead offer strategy, which in MR will become a financially binding schedule. The IESO should be able to provide market participants with enough time to gather inputs for the DAM submission from a variety of sources (water management information, asset updates, fueling information, transmission constraints) and factor those inputs into the Dispatch Data and Pseudo Unit Generator Data reports.</p>	<p>The purpose of the two reports referenced here, is to let participants know the final dispatch data and PSU data (i.e.. latest) that will be used to run the DA calculation. Issuing the reports at 10:00 EPT is appropriate which is at the close of the DAM submission window.</p> <p>By shifting the publishing time to 6AM, these 2 reports are no longer serving that purpose. It is not clear how having this information earlier would impact the participant submission.</p> <p>That said, market participants currently have the ability to retrieve their submitted dispatch data (and will continue to) on-demand - at any time - by using EMI or MIM Web Service API. This would not be classified as an automated report thus not documented in P&R chapter.</p>
10	OPG	<p>Comments #7 – Table 3-3, Report #5</p> <p>OPG notes that this report is published ‘after the fact’ and would like confirmation that it is not intended to replace the value bid report.</p>	<p>Dispatch Data Report for PD and Real Time Scheduling Processes (Table 3-3, Report #5) is intended to replace current report titled Real-time Energy Market Bid Offer Report (Table 3-3, Report #4). The IESO is not familiar with value bid report. If the comment is on Valid Bid Report (VBR), they no longer exist since the Market Participant Interface (MPI) was decommissioned in 2016. Since then the IESO has been providing the most current bid/offer data in XML format which will continue under MRP.</p>
11	OPG	<p>Comment #8 – Table 3-5, Reports #5 & 8</p> <p>OPG requests further information on the purpose of report #5 in Table 3-5 (ADE Expansion Request Approval). Is this report intended to formalize the approval process for ADE expansion requests? What would this notification look like?</p>	<p>This report is intended to automate the approval confirmation for ADE expansion requests.</p> <p>Additional details about the form will be addressed during the Implementation Phase.</p>

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12	OPG	OPG would also like clarification on Report #8 in Table 3-5 regarding cleared transactions in 'aggregate form'. Can the IESO define what this would look like?	The details of this report have not been defined. These details will be considered during the Implementation Phase.
13	OPG	<p>Given that the IESO intends to retain the ADE, OPG has reproduced its previous review comments regarding the ADE that were provided for the review of the DAM High Level Design:</p> <p>"Under the Decisions (2.1.2), the IESO states that "in the event that the right incentives are not in place before the renewed market goes live, the IESO proposes that the ADE offer obligation would be retained as a transitional measure." OPG would like to understand the criteria the IESO will use to determine whether incentives to participate are adequate.</p>	The IESO is recommending that this feedback be addressed as part of the Offer, Bids and Data Integration (OBDI) document review. This feedback will be included and responded to in more detail as part of the OBDI review process.
14	OPG	<p>Cont'd from ID 13</p> <p>In the event that Availability Declaration Envelope ("ADE") is retained under a DAM, OPG believes the method which ADE is determined and used for hydroelectric resources would need to be revisited. Specifically, due to the variable nature of water conditions, ADE should not be calculated based on resource offers; rather, they should be calculated in a manner similar to that of variable generators where ADE represents a resource's registered capacity less derates. This would incent hydroelectric resources to more accurately reflect their capability based on expected conditions at the time of offer submission rather than trying to ensure adequate ADE in real-time.</p>	The IESO is recommending that this feedback be addressed as part of the Grid and Market Operations Integration (GMOI) document review. This feedback will be included and responded to in more detail as part of the GMOI review process.

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15	OPG	<p>Cont'd from ID 13 and 14</p> <p>If the IESO remains adamant that ADE be calculated based on DAM resource offers, an alternative solution would be to allow RT offers to exceed DAM ADE by a reasonable margin to recognize variability of water conditions (e.g. head change MW) between DA and RT timeframes. This example also applies for nuclear stations that experience varying lake temperatures between DA and RT affecting output"</p>	<p>The IESO is recommending that this feedback be addressed as part of the Grid and Market Operations Integration (GMOI) document review. This feedback will be included and responded to in more detail as part of the GMOI review process.</p>
16	OPG	<p>Comment #9 – Table 3-6/7, Report #12/11</p> <p>OPG suggests that the following reports (Pre-Dispatch Total Report & Real Time Total Report) include summary data at the zonal level:</p> <ul style="list-style-type: none"> • Table 3-6, Reports #12 • Table 3-7, Reports #11 	<p>The IESO has not yet determined the revised layout of these reports. These details will be established during implementation in consultation with external stakeholders.</p>
17	OPG	<p>Comment #10 – Table 3-7, Reports #13 &14</p> <p>OPG requests that the IESO provide specific details on the frequency of publishing for these reports (Daily Energy Limit Tracking & Number of Starts Tracking). Will it be hourly? OPG also suggests that these two reports be consolidated into a single report to reduce the overall number of reports that need to be published.</p> <p>OPG recommends that all Daily Generator Data submitted by participants be consolidated into a single report, which includes DELs, # of starts tracking, forbidden regions, etc.</p>	<p>This recommendation will be considered during the Implementation Phase</p>
18	OPG	<p>As indicated in the Offers, Bids and Data Inputs Detailed design document the IESO will monitor when a generator was last above MLP in Predispatch and utilize its lead time curve to help determine a generators status. OPG would like to encourage the IESO produce a confidential report to market participants that shows what the IESO tool calculates in terms of generator status. This will provide participants with transparency and the potential to monitor the IESO inputs and request changes to unit conditions based on SEAL concerns or potentially incorrect data being used.</p>	<p>This request will be considered during the Implementation Phase.</p>

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19	OPG	<p>Comment #11 – Table 3-8, Report #2</p> <p>OPG requests the detailed definitions of the 'nine zonal pricing zones' including details on how they are different from the ten existing transmission zones.</p>	<p>The ten existing transmission zones (IESO Zones) are described in document titled "Transfer Capability Assessment Methodology" issued periodically when quarterly Reliability Outlook (formerly known as the 18-Month Outlook) is issued.</p> <p>The ten existing transmission zones are used to define the virtual transaction zonal trading entities with one exception. The Southwest virtual transaction trading zone will combine to represent all load facilities within the Bruce and Southwest electrical zones. The eight remaining transmission zones define the other eight virtual transaction zonal trading entities.</p> <p>The nine virtual transaction zonal trading entities are described in section 3.5.6 of Facility Registration Detailed Design Issue 1.0 and section 3.4.7 of Offers, Bids and Data Inputs Detailed Design Issue 1.0.</p> <p>The four demand forecast areas are described in section 3.5.6 of Offers, Bids and Data Inputs Detailed Design Issue 1.0.</p>
20	OPG	<p>Comment #12 – Table 3-9 – All listed reports</p> <p>OPG requests specific details on the timing of publishing of these reports and encourages the IESO to ensure they are released 15 minutes past the hour, if possible, to give market participants additional time to act on them.</p>	<p>The IESO has not finalized the timing for reports. These details will be brought forward and considered during the Implementation Phase.</p>
21	OPG	<p>Comment #13 – Table 3-12 – Report #3</p> <p>OPG suggests that the Mid-Term Demand Forecast Report provide forecast demand for four zones (i.e. the same as for the Near-term Demand Forecast Report) rather than for only two zones. This would reduce the number of different zoning criteria needed in the new market and provide better granularity.</p>	<p>The mid-term demand forecast is used for planning. Therefore suggested changes are out of scope.</p> <p>Changes to near-term demand forecast are described in section 3.5.6 of Offers, Bids and Data Inputs Detailed Design Issue 1.0. The near-term demand forecast will be used in the future day-ahead and real-time market for scheduling and price formulation.</p>
22	OPG	<p>Comment #14 – Table 3-13 – Report #5</p> <p>OPG recommends that the Variable Generation Forecast Summary Report be modified such that it breaks down the forecasts at the zonal level (i.e. based on Ontario's ten transmission zones). It currently only provides an Ontario-wide summary.</p>	<p>Currently, the Variable Generation Forecast Summary Report provides total provincial forecast and in areas where there are at least three facilities in operation, zonal forecast is also included. This reporting practice to maintain confidentiality of market participant's data will continue in the future.</p>
23	OPG	<p>Comment #15 – Table 3-14/16/18 – Reports #1</p> <p>OPG recommends that the following reports be published ahead of the day ahead submission window at 6:00 EPT so they can inform market participant offer strategy:</p> <ul style="list-style-type: none"> Table 3-14, Report #1: Day-Ahead Operating Reserve Shortfalls Reports (including minimum requirement in each OR area) Table 3-16, Report #1: Day Ahead Intertie Scheduling Limit Report Table 3-18, Report #1: Day Ahead Security Constraints Report 	<p>The reports in question are currently published after every successful run of the DACE. Going forward the reports will continue to be published after the DAM runs. These reports contain results from the DA calculation and therefore data won't exist to generate them earlier.</p>

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24	OPG	<p>Comment #16 – Table 3-18, All Reports</p> <p>OPG’s experience is that these reports are lacking in clarity and are difficult to understand and thus, provide minimal benefit in their current format. OPG suggests that the IESO review these reports and look for ways to improve presentation, clarity and transparency so that they would be more valuable to market participants. A glossary defining all the codes/terms used in the tables should be included directly in the report so that market participants can understand.</p>	<p>The IESO will assess the existing transmission reports and will consider potential revisions in content and/or timing for a post-MRP market with LMPs. Any revisions will be identified in V2 of the document.</p>
25	OPG	<p>Comment #17 – Section 3.3.11, General Comment on Market Power Mitigation</p> <p>OPG notes that this section should be reviewed in parallel with the Market Mitigation detailed design document, which is scheduled to be released as draft on May 5, 2020. OPG may have additional comments on the reports listed in this section once the draft Market Mitigation Detailed Design Document is released.</p>	<p>Stakeholders will have the opportunity to provide additional feedback after a first draft of all Detailed Design documents have been published.</p>
26	OPG	<p>The definitions of NCA, DCA need to be established based on a transparent criteria and the criteria should be provided as part of the description of these reports. For example, In the MPM detailed design document (Section 6.8.1) there is reference to designating specific areas as Narrow Constrained Areas (NCAs) based on historical data from the previous year and prospective analysis that predicts where congestion is expected to continue. The IESO will obtain historical transmission constraints and generation shift factor (GSF) data from the day-ahead market (DAM) and real-time market. The historical data set is taken from the previous year, and reviewed annually. Participants should get to see the GSF values for DAM and RT at a resource aggregate level to provide transparency on the transmission constraints that will be impacting participant’s assets.</p>	<p>The IESO is recommending to address this feedback as part of the Market Power Mitigation (MPM) document review. This item with an IESO response will be included in the response document to the MPM document review.</p>
27	OPG	<p>The Reports shown for Market Power Mitigation also don’t seem to fully align with the Market Power Mitigation Detailed Design Document in terms of listed reports in Section 3.16 - Reporting on Mitigation. E.g. From MPM Detailed Design Document:</p> <ul style="list-style-type: none"> Public reports that contain summary data on an anonymous basis of how frequently the mitigation process resulted in dispatch data values being set to reference levels; <p>This type of report doesn’t seem to be listed in any of the tables pertaining to MPM in Reports and Publishing Document.</p>	<p>Table 3-22: Mitigation Events, No 1 contains the requested data.</p>
28	OPG	<p>OPG also recommends that the IESO further break down the Reports for MPM into Reports pertaining to Energy and Operating Reserve separately. Table 3-20 Constrained Area Designation Reports should be broken down further to:</p> <ul style="list-style-type: none"> Local market power Narrow Constrained Areas (NCA) Report – For Energy; Local market power Dynamic Constrained Areas (DCA) Report – For Energy; Local market power Broad Constrained Areas (BCA) Report – For Energy; Global Market Power Conditions Summary – Province-wide market power Local market power for Operating Reserve Report – Reserve area limited operating reserve supply Global market power for Operating Reserve Conditions Summary – Province-wide limited operating reserve supply 	<p>Table 3-20 contains reports for NCA designation (Energy), DCA designation (Energy) and the Global Market Power Conditions Summary. BCA (Energy), Local (Operating Reserve) and Global (Operating Reserve) do not include any designation per se.</p>

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29	OPG	<p>Comment #18 – Table 3-19, Report #1</p> <p>OPG would like to reiterate its concern in regards to the use of dynamic loss factors in the new market as previously document in OPG’s comments on the Single Schedule Market High Level Design. OPG’s previous comment:</p> <p>“In general, OPG does not support dynamic loss factors updated more frequently than one hour, due to experienced dispatch volatility issues experienced when it was last implemented at market open (2002). The IESO acknowledges these issues and states quasi-dynamic loss factors will be considered if using dynamic loss factors is not technically feasible.”</p>	<p>The specifics of dynamic loss factors will be documented in upcoming release of detailed design chapters on Day-Ahead Market Calculation Engine, Pre-Dispatch Calculation Engine and Real-Time Calculation Engine.</p>
30	OPG	<p>Comment #19 – Table 3-20, Report #3</p> <p>OPG would like confirmation that the IESO will provide a clear definition/criteria of what constitutes an uncompetitive intertie.</p>	<p>The process of designation of an uncompetitive intertie will be described in the relevant market manual.</p>
31	OPG	<p>Comment #20 – Table 3-20, Report #4</p> <p>OPG recommends that this report be published during the pre-dispatch period so that the information can be considered by market participants during real-time. This is another report that highlights the need for clarity with regards to frequency/timelines of many of these published reports.</p>	<p>The IESO has not finalized details such as timing for reports. This type of detail will be brought forward and considered in the Implementation Phase.</p>
32	OPG	<p>Comment #21 – Table 3-21, All reports</p> <p>OPG would like confirmation that these reports will include information on both reference levels for economic and physical withholding. This is another instance where it would be prudent to highlight what headers/specific information will be in these reports.</p>	<p>Report No. 1 in this table ("Reference Level Report") will contain reference levels which are used for assessment of economic withholding.</p> <p>Report No. 2 in this table ("Reference Quantity Report") will contain reference quantities which are used for assessment of physical withholding.</p>
33	OPG	<p>Comment #22 – Table 3-22, Reports 2-5:</p> <p>OPG notes that the timing of these notices is important and should be included in the detailed design. OPG also recommends that these notices be provided as soon as possible following the event.</p>	<p>These reports will be published as soon as possible following determination of a failure of the conduct and impact test that affects dispatch, prices or settlement of a resource. This will be reflected in the detailed design chapter.</p> <p>The processes involved in carrying out the various conduct and impact tests which result in these reports and specific timing details will be developed during implementation.</p>

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34	OPG	<p>Comment #23 – Table 4-1, Page 36, Row 1</p> <p>Can the IESO provide justification for stating they will not provide market rule amendments to reflect (i) the new reporting timelines to be aligned with future market timelines, publication frequency (ii) any content changes (such as new market participant and facility types). And that they will be covered in applicable Market Manuals only.</p> <p>Presently this is not explicitly stated in the Market Rules under Chapter 5, 7.1.5, why is there a need for this statement?</p>	<p>Market design is an on-going process and the Detailed Design Documents are a snapshot of where that design was at a particular point in time. The IESO’s initial assessment was based on the language in existing section 7.1.5, which explicitly points to the applicable market manual to provide details on timing and content. The IESO’s initial assessment on the required market rule amendments may change, and any revisions required to codify more details on the report in the market rules will be incorporated in the market rule amendment process.</p> <p>The IESO will stakeholder draft market rule and market manual content based on the detailed design documents and solicit feedback from stakeholders prior to the commencement of the Technical Panel process. Further input from stakeholders during the market rule amendment process is encouraged.</p>
35	OPG	<p>OPG recognises that this section of the document pertaining to Market Manual and other document updates will need to be re-reviewed when other detailed designed documents are released. Participants should be given the opportunity to re-review this section once all relevant design documents have been released for review, many of the overlapping documents won’t be released until late July.</p>	<p>Stakeholders will have the opportunity to provide additional feedback after a first draft of all Detailed Design documents have been published.</p>
36	OPG	<p>Frequency Column is a good opportunity to provide greater detail/clarity with regards to expected timelines for a variety of reports, however in many instances the frequency and timing is vague e.g. ‘As Required’, ‘Triggered by different process timelines’.</p>	<p>Details for each report will be specified through the Implementation Phase of the program.</p>
37	Electricity Distributors Association	<p>The EDA appreciates the opportunity to comment on the IESO’s Detailed Design document “Publishing and Reporting Market Information”. We note that the document provides high level descriptions of the changes between current reports and proposed reports attributable to MRP. Our member LDCs will benefit greatly when they are able to review templates, or ideally mock ups, of both the proposed new reports and of the proposed changes to existing reports.</p> <p>We also seek to understand whether the proposed changes are intended to be interim or if they are expected to be enduring and to serve the long term needs of Ontario’s evolving electricity markets. We look forward to learning about the IESO’s process for augmenting and refreshing the suite of reports on a ‘go forward’ basis as the electricity market evolves, the capacity auction matures and innovations in the markets for ancillary services are operationalized.</p>	<p>As part of the Detailed Design, the IESO has not created report templates. The IESO will be looking at how to provide this type of information within the Implementation Phase.</p>
38	Electricity Distributors Association	<p>The IESO’s summary of the required changes (i.e., no change, revisions, new and retired categories), grouping of changes by report type and audience are useful for users and consumers of the report.</p>	<p>Thank you for your feedback.</p>

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39	Electricity Distributors Association	We note that the IESO has identified the changes pursuant to publishing and reporting required upon implementation of MRP and has provided a brief summary of these changes. These descriptions are sufficiently detailed to assist market participants (current participants or entities considering participating) to understand the nature of the change in reporting. We are concerned that these high-level descriptions may not provide LDCs with sufficient information and that mock ups of the proposed reports would support them as they consider or prepare to actively participate in the market.	There will be further precision and detail provided on this request during the Implementation Phase.
40	Electricity Distributors Association	We seek clarification on whether the IESO will report on Locational Market Prices and the Ontario zone energy price simultaneously for the foreseeable future.	<p>Today the IESO publishes a Shadow Price report which provides a complementary price that is equivalent to the locational marginal price that pairs with the issued dispatch instruction. For the foreseeable future, this Shadow Price report will have to be used as a proxy of the LMPs that the IESO intends to publish following MRP go-live.</p> <p>The algorithm and proposed modeling needed to generate the proposed prices will be unavailable for many years to come, hence the exact equivalent can not be provided at this time.</p>
41	Electricity Distributors Association	Our review did not identify any omissions in the information that is to be reported on based on the information available to date. We note that linkages to other Detailed Design documents, such as Market Settlement, exist and that some of those documents are presently under review.	Stakeholders will have the opportunity to provide additional feedback after a first draft of all Detailed Design documents have been published.
42	Electricity Distributors Association	Our members are, and will be, 'users' and 'consumers' of market rules requirements. They anticipate that the IESO has the capabilities and capacity to provide the required market rules in a timely manner and seek to understand the steps that the IESO would take to respond to concerns identified in a future period.	The IESO will stakeholder draft market rule and market manual content together and in batches. The IESO will solicit feedback from stakeholders prior to commencement of the Technical Panel process.
43	Evolugen	Will there be archival access to reports which are being ended with the MRP, specifically HOEP and shadow prices, and if so, how long will they be available?	The IESO has not decided on archival access to reports as part of MRP Detailed Design. This request will be considered during the Implementation Phase.

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44	Evolugen	How long of a testing period will there be in the Sandbox before go-live to allow Market Participants to reconfigure existing tools and procedures, as well as making new ones?	Detailed planning and scheduling for the Implementation Phase is still underway. A high-level schedule that includes market participant readiness activities was shared at the August 2019 MRP Update Meeting.
45	Capital Power	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.	The IESO recognizes that stakeholder feedback may change once subsequent design documents are released. As discussed in the engagement forums, if there is a need to add additional comments because of new information or considerations, stakeholders will have the opportunity to provide additional feedback on any of the Detailed Design documents once they have all been posted.
46	Capital Power	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.	The IESO will update the Information Confidentiality Catalogue to include new unclassified data parameters collected following the implementation of the Market Renewal Project and will follow the processes set out in the market rules regarding information confidentiality classification. Decisions regarding market reporting will likewise be guided by any requirements in the market rules.
47	Capital Power	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, Predispach and RT prices in the province.	The IESO will assess the existing transmission reports and will consider potential revisions in content and/or timing for a post-MRP market with LMPs. Any revisions will be identified in v2.0 of the document.

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48	Capital Power	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.	In the Publishing and Reporting Market Information detailed design document, Table 4-1: Market Rule Impacts and Table 5-1: Impacts to Market-Facing Procedures show preliminary linkages between the reports and corresponding market rule and market manual changes. The future proposed market rule amendment documents for Publishing and Reporting will specify the linkages between the market rule amendments and the reports specified in the Publishing and Reporting Market Information detailed design document.
49	Capital Power	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.	The IESO will update the Information Confidentiality Catalogue to include new unclassified data parameters collected following the implementation of the Market Renewal Project and will follow the processes set out in the market rules regarding information confidentiality classification. Decisions regarding market reporting will likewise be guided by any requirements in the market rules.
50	Capital Power	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.	Stakeholders will have the opportunity to provide additional feedback after a first draft of all Detailed Design documents have been published.
51	Capital Power	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.	The IESO will update the Information Confidentiality Catalogue to include new unclassified data parameters collected following the implementation of the Market Renewal Project and will follow the processes set out in the market rules regarding information confidentiality classification. Decisions regarding market reporting will likewise be guided by any requirements in the market rules.
52	Capital Power	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.	In the Publishing and Reporting Market Information detailed design document, Table 4-1: Market Rule Impacts and Table 5-1: Impacts to Market-Facing Procedures show preliminary linkages between the reports and corresponding market rule and market manual changes. The future proposed market rule amendment documents for Publishing and Reporting will specify the linkages between the market rule amendments and the reports specified in the Publishing and Reporting Market Information detailed design document.
53	TransAlta	We appreciate the opportunity to comment on the IESO's detailed design document for Publishing and Reporting Market Information (PRMI). Our view is that the market will be more efficient when more information is available to market participants. In general, there is a need for more market information to be published, and specifically to support some of the market design changes being implemented as part of the Market Renewal Program (MRP). We recommend that the IESO improve its processes for releasing real-time information because many reports are based on forecasts or are not updated quickly enough to reflect real-time conditions. Making market participants aware of real-time conditions will improve the market's efficiency.	Thank you for the feedback. If there are specific recommendations to address this concern not included with the feedback already submitted, in either the Detailed Design or Implementation phase, please provide that advice to engagement@ieso.ca .
54	TransAlta	We recommend that the IESO review the information confidentiality catalogue to determine what information could be released to market participants and focus on the best practices implemented in other electricity markets. For example, other markets make bids and offers in energy, ancillary services, capacity and transmission rights markets available publicly (with a time lag and market participant masking in some cases).	The IESO will update the Information Confidentiality Catalogue to include new unclassified data parameters collected following the implementation of the Market Renewal Project and will follow the processes set out in the market rules regarding information confidentiality classification.
55	TransAlta	More specifically, there is insufficient real-time transmission information to understand how dispatches are determined and shadow prices are set in the existing market during transmission constraints. Transmission information will be more critical once nodal prices are adopted as part of the MRP. We make proposals in the sections below about the types of information that the IESO should provide.	The IESO will assess the existing transmission reports and will consider potential revisions in content and/or timing for a post-MRP market with LMPs. Any revisions will be identified in v2.0 of the document.

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56	TransAlta	There is also a lack of capability information about the transmission system, such as line ratings and interface ratings under differing system conditions. The existing transmission reports are not updated in real-time and it is not possible to use reported transmission element outages to determine transmission limits. We recommend that the PRMI detailed design document include market rule changes to require the IESO to publish a single-line diagram and a “Gold Book” similar to that published by the NYISO.	The IESO will assess the existing transmission reports and will consider potential revisions in content and/or timing for a post-MRP market with LMPs. Any revisions will be identified in v2.0 of the document.
57	TransAlta	Finally, we suggest that the IESO revisit the PRMI detailed design document after all other detailed design documents have been released because market participants may identify additional information needed based on those detailed design documents.	Stakeholders will have the opportunity to provide additional feedback after a first draft of all Detailed Design documents have been published.
58	TransAlta	<p>3.3.6 Price Reports</p> <p>We recommend that the DAM, PD and RT energy and OR LMP reports include a description of all binding transmission constraints and any overrides of binding constraints. It is not clear from the detailed design document whether that information would be included. Examples of this information as provided by MISO for real-time constraints is available here: binding constraints and overrides.</p> <p>The existing DA, PD and RT security constraint reports do not provide enough details to satisfy these requirements.</p>	The IESO will assess the existing transmission reports and will consider potential revisions in content and/or timing for a post-MRP market with LMPs. Any revisions will be identified in v2.0 of the document.
59	TransAlta	<p>3.3.7 Demand Reports</p> <p>We support the IESO’s decision to publish zonal demand forecasts in the proposed “Ontario Near-Term Demand Forecast Report”. We would recommend that this should include forecast demand for each of the 10 IESO zones instead of only four forecast areas.</p> <p>We recommend that the IESO publish real-time demand with at least a zonal granularity, and preferably at a NCA granularity (and a DCA granularity when known in advance). This report should be updated on each of the 5-minute intervals and be available as a historical report. The proposed demand reports do not appear to include this information.</p>	<p>Thank you for your feedback. The request to report on ten IESO zones instead of the proposed four demand forecast areas is a complex change that is not feasible to deliver as part of MRP.</p> <p>Regarding your second request, we can provide the existing hourly zonal demand report at a 5 minute granularity in addition to the current hourly granularity. It is not feasible, however for this information to also be provided at an NCA/DCA granularity.</p>
60	TransAlta	<p>3.3.9 Operating Reserve Reports</p> <p>We recommend that the IESO consider publishing operating reserve offers after a reporting lag and with market participant and facility IDs masked. This would provide valuable information for market participants to understand the Ontario supply curve when making decisions on maintaining existing resources or developing new resources.</p> <p>In addition, we recommend publishing a report that discloses when the IESO has decided to procure additional OR for flexibility and the quantify of additional OR procured for flexibility. It would be helpful to have this data publicly available to support market participant assessments of the potential value of participating in the OR markets.</p>	Enhancements to operating reserve (OR) reporting are part of a discussion on the flexibility of OR providers and is not within the scope of MRP. Any additional reporting as a result of future discussions in another engagement stream will be communicated to stakeholders and the market as they are available.
61	TransAlta	<p>3.3.10 Transmission Reports</p> <p>We support the IESO maintaining the transmission outages reports, which currently contain valuable information for forecasting potential congestion on the transmission system.</p> <p>We recommend that the IESO publish additional transmission facility information so that market participants can better understand how transmission outages affect the transmission system capability. This information would include a single line diagram for the system, facility ratings, and interface limits during major outages.</p>	The IESO will assess the existing transmission reports and will consider potential revisions in content and/or timing for a post-MRP market with LMPs. Any revisions will be identified in v2.0 of the document.

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62	TransAlta	We recommend that the IESO improve the reporting detail, accuracy and frequency of the "Transmission Facility Outage Limits Reports". These reports are often vague and rely on generic comments for derates such as "Internal System Conditions". This prevents market participants from understanding what is causing the constraint and understanding how nodal prices will be set in the new markets. These reports are also frequently slow to update and do not reflect real-time information. It would be helpful for the IESO to explain what obstacles exist to improving these reports and whether this can be done as part of the MRP.	The IESO will assess the existing transmission reports and will consider potential revisions in content and/or timing for a post-MRP market with LMPs. Any revisions will be identified in v2.0 of the document.
63	TransAlta	We recommend that the IESO publish TR auction bids (and offers if a TR resale market is implemented) after a certain lag and with market participant identification masked. This information is valuable to allow that market to operate efficiently.	This request does not fall within the scope of MRP.
64	TransAlta	<p>3.3.11 Market Power Mitigation Reports</p> <p>We support the IESO's proposed reporting for NCAs, DCAs and Global Market Power. We recommend that the NCA and DCA reports include details about the system conditions that would lead to the constraints because there may not be sufficient information available in real-time to allow market participants to forecast when an NCA or DCA could become binding.</p>	The IESO will consider the recommendation weighing the benefits and costs of providing those details.