MRP Energy Detailed Design
Design Document: Pre-Dispatch Calculation Engine

Stakeholder Feedback Form

Date Submitted:	**Feedback Provided By**:	
2020/12/02	Company Name:	Electricity Distributors Association (EDA)
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Feedback Due: December 2, 2020	Phone:	
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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 **December 2, 2020** to engagement@ieso.ca.

Please let us know if you have any questions.

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General feedback on the Detailed Design Document (please expand any section as required)

Ontario's local distribution companies (LDCs) are the face of the industry to the overwhelming majority of the end users in the province: they serve over 5,000,000 customers and in 2019 delivered approximately 125 TWh – or about 90% - of all the electricity used in the province.

These are the comments of the Electricity Distributors Association (EDA) on the Independent Electricity System Operator's (IESO) Detailed Design for Energy – Market Renewal Program (MRP). Our focus is on matters directly relevant to LDCs, that the IESO will assign non-dispatchable load (NDL) status when MRP is deployed, and LDC-connected customers. Our objectives are:

- to identify improvements to the Detailed Design, and
- to provide constructive comments that will support the transition from Detailed Design to Implementation.

Our comments build on those made during the High-Level Design phase. This submission is consistent with the EDA's feedback on other draft Detailed Design documents published by the IESO, including the Day Ahead Market (DAM) Calculation Engine, Real-time Calculation Engine, and Market Settlements Design documents.

We repeat that, in addition to identifying the required amendments to IESO Market Rules and Market Manuals, the IESO, the Ontario Energy Board (OEB), and the Ministry of Energy, Northern Development and Mines (MENDM) should proactively engage with LDCs and their customers to identify, scope, evaluate and decide on enabling legislative amendments, amendments to regulatory policy and amendments to regulatory instruments. For example, the IESO's published materials to date have not provided instruction as to which wholesale market price produced in the renewed market will be applied to non-RPP customers and it remains unclear how LDCs will be invoiced under MRP and, by extension, how their customers' bills will change. We continue to assume that the OEB will amend the formulas it uses to calculate Regulated Price Plan (RPP) prices to use the appropriate new wholesale market prices (e.g., the DAM Ontario Zonal Price). We also assume that the OEB will amend the formulas used in the Retail Settlement Code, e.g., to replace references to the Hourly Ontario Energy Price (HOEP) with the appropriate new wholesale market price clarifications. These changes to OEB codes will clarify how the electricity commodity charges for non-RPP customers, whose electricity commodity charges currently consist of the HOEP and Global Adjustment charges, are to be quantified in the reformed market. LDCs will be responsible for implementing revised, or possibly new, settlement and billing processes and will be the main point of contact for electricity customers with respect to changes on electricity bills.

The inputs required for the IESO to settle with NDL entities in the reformed market will be produced by the DAM Calculation Engine and by the RT Calculation Engine. We observe that the Pre-Dispatch (PD) Calculation Engine does not directly impact NDL settlement (i.e., outputs from the PD Calculation Engine are not use as inputs to NDL settlement). Therefore, our commentary herein builds on themes of past submissions, rather than focusing on specific sections of the PD calculation engine.

Our feedback is as follows:

1) We suggest that the IESO ensure consistency of terminology in this section relative to other Detailed Design documents.

2) We characterize the Detailed Design as incomplete as it does not reference changes proposed by the interim design of the IESO's Storage Design Project. For example, the IESO does not include references to 'electricity storage participants' per MR-00445-R00-R05 ('Implementation of the Interim Storage Design'), which is currently being reviewed by the IESO's Technical Panel in preparation for consideration by the IESO's Board of Directors, the final step in the Market Rule amendment process.

3) We recommend that the IESO engage with stakeholders to provide worked examples of the Calculation Engines (DAM, PD and RT) through to market settlement, particularly for NDL participants such as LDCs. Examples should clarify inputs required, calculations performed, and outputs produced. As our past submissions points out, there is need to understand impacts of Hourly Demand Response (HDR) resources and IESO forecasts on the calculation of the Load Forecast Deviation Charge (LFDC) used in NDL settlement.

With the publication of this last Detailed Design document, we note that the IESO now plans to respond to stakeholder feedback and produce v2.0 Detailed Design documents by end of January 2021, concluding the Detailed Design Phase of the MRP. We seek additional information from the IESO for the next phase of consultation on MRP. We recommend that the IESO outline plans for engaging with stakeholders through the implementation phase, such as final review of Detailed Designs, illustrating how stakeholder feedback was incorporated into the Detailed Designs, and tracking matters arising throughout the Detailed Design phase that will be consulted on throughout the implementation phase

Design Document: Section	Detailed Comments (Areas of Support or Concern)
1. Introduction	No comment
2. Summary of Current and Future State	No comment

Design Document: Section	Detailed Comments (Areas of Support or Concern)
3. Detailed Functional Design	No comment
4. Market Rule Requirements	No comment
5. Procedural Requirements	No comment
6. Business Process and Information Flow Overview	No comment