

# MRP Energy Detailed Design

## Stakeholder Feedback Form

<b>Date Submitted:</b> <i>2020/11/30</i>	<b>Feedback Provided By:</b> Company Name: HQEM Contact Name: Frederic Belanger
<b>Feedback Due:</b> December 2, 2020	Phone: [REDACTED] Email: [REDACTED]

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](mailto:engagement@ieso.ca).

Please let us know if you have any questions.

IESO Engagement  
[engagement@ieso.ca](mailto:engagement@ieso.ca)

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

Please find below HQEM's feedback, ahead of the final feedback review for all draft design document, coming December 2<sup>nd</sup> 2020.

First of all, as always, HQEM commends the Independent Electricity System Operator ("IESO") for providing stakeholders with the opportunity to comment on the energy market detailed design.

As indicated in past comments, HQEM wants to reiterate its position against the treatment of imports decision published in the high-level design in August 2019, as well as in the Real-time Calculation engine detailed design feedback document posted on October 30<sup>th</sup>. The feedbacks already posted explain HQEM position and argumentation against the discrepancy of the congestion treatment between imports and exports. HQEM is still waiting to have a clear explanation on how the IESO intends proceed with this discrepancy and answer past comments made.

In addition to this, HQEM would like to echo OPG's feedback submitted on August 7<sup>th</sup> 2020, regarding segregated mode of operation ("SMO"). These transactions occurring on an uncompetitive intertie should remain flexible for the participants. The IESO should explain in detail the impact of these deadlines, how they are treated as outages and how it affects the transmission system and limits.

Participants should benefit from a better flexibility, because a decision that made sense on a day ahead basis could need to be reviewed once the day ahead market ("DAM") window is closed. These modifications should be available, at least on the same day as the transaction, or on a short time basis, to the participant. The 2 hours window could be modified and extended as a solution, but having these transactions setup, without any possible modification, except for reliability and SEAL reasons, appears to be excessive.