

Market Rule Amendment Submission

This form is used to request an amendment to, or clarification of, the *Market Rules*. Please complete the first four parts of this form and submit the completed form by email or fax to the following:

Email Address: <u>Rule.Amendments@theIMO.com</u> Fax No.: (416) 506-2847 Attention: Market Rules Group **Subject:** *Market Rule Amendment Submission*

All information submitted in this process will be used by the *IMO* solely in support of its obligations under the *Electricity Act, 1998*, the *Ontario Energy Board Act, 1998*, the *Market Rules* and associated policies, standards and procedures and its licence. All submitted information will be assigned the *confidentiality classification* of "public" upon receipt. You should be aware that the *IMO* will *publish* this *amendment submission* if the *Technical Panel* determines it warrants consideration and may invite public comment.

Terms and acronyms used in this Form that are italicized have the meanings ascribed thereto in Chapter 11 of the *Market Rules*.

PART 1 – SUBMITTER'S INFORMATION

Please enter contact information in full

Name: IMO Staff		
(if applicable) <i>Market Participant /</i> <i>Metering Service Provider</i> No. ¹ :	Market Participant Class:	
Telephone: 416 506-2801	Fax: 41 506-2847	
Email Address: rule.amendments@theimo.com		

PART 2 – MARKET RULE AMENDMENT SUBMISSION INFORMATION

Subject: Day-Ahead M	arket		
Title: Facility Registrat	tion		
Nature of request (please indicate with X):AlterationDeletion_X_AdditionClarification			
Chapter: 12	Appendix:	Sections:	
Sub-sections proposed	for amending/clarifyin	ng :	

¹ This number is a maximum of 12 characters and does not include any spaces or underscore.

PART 3 – DESCRIPTION OF THE ISSUE

Provide a brief description of the issue and reason for the proposed amendment. If possible, provide a qualitative and quantitative assessment of the impacts of the issue on you and the *IMO-administered markets*. Include the Chapter and Section number of the relevant market rules.

In consultation with market participants and other stakeholders, the IMO has developed a high level design of a day-ahead market (DAM)¹. The IMO Board has endorsed proceeding with the development of a day-ahead market and has directed the IMO to proceed with the detailed design and market rule amendments for the DAM consistent with the high-level design. Market rule amendments are needed to incorporate the facility registration requirements for the day-ahead market. The following is a brief summary of the facility registration requirements for the DAM. The facility registration design document² provides details on the facility registration requirements for the DAM.

A key function of facility registration is the assessment of physical facilities or boundary entities to ensure that they meet the relevant reliability, performance, and technical standards as defined in the market rules. The facility registration process also ensures that IMO information systems contain accurate and current facility or boundary entity information. This process is essential for maintaining the security and adequacy of the IMO-controlled grid, and to the operation of the IMO-administered markets in an orderly manner. The information provided during facility registration is used in both the market dispatch, settlement and other market processes. These elements of facility registration for the DAM are the same as for participation and activities in the real-time market. Therefore any facility associated with physical transactions (i.e. buying or selling energy, selling operating reserve, importing energy or operating reserve, exporting energy) in the DAM will need to be registered in the DAM.

Physical transactions in the DAM will have a corresponding real-time market physical transaction. Therefore facilities registered for physical transactions in the DAM must first be registered in the realtime market. Specifically:

- For facilities or boundary entities that are already registered in the real-time market, market participants that are required to or wish to participate in day-ahead market physical transactions will only need to meet the incremental facility registration requirements to support their day-ahead market participation and activities;
- For facilities or boundary entities that are <u>not</u> already registered in the real-time market, market participants that are required to or wish to participate in day-ahead market physical transactions will need to meet both the real-time market and day-ahead market facility registration requirements.

The incremental facility registration requirements to support day-ahead market participation and activities are typically the following:

1. Provision of additional technical information to support day-ahead market unit commitment and scheduling for a given facility;

¹ High Level design strawman can be found on IMO web-site at: http://www.theimo.com/imoweb/pubs/consult/mep/DAM_WG_Strawman-4_0.pdf.

² Facility Registration Design Document can be found on IMO web-site at:http://www.theimo.com/imoweb/pubs/consult/mep/dam_wg_IMO_DES_0017_DAM_FacilityRegistr ation.pdf.

PART 3 – DESCRIPTION OF THE ISSUE

2. Identification of the registered market participant and metered market participant for a given facility.

Market participants that engage in virtual transactions in the DAM will not be required to meet any facility registration requirements to support that activity as virtual transactions do not have any associated specific physical facility, delivery or consumption.

The DAM introduces the ability for market participants to submit multi-part offers and bids. Market participants wishing to submit multi-part offers and bids for a given facility would be required to provide information at the time of facility registration that would be used to validate multi-part offers or bids for that facility.

The DAM incorporates dispatchable and non-dispatchable load and generation resource types and also introduces a number of new load and generation resource "types". These new resource types are:

- Price-sensitive hourly or multi-hour load
- Price responsive dispatchable load
- Price responsive non-dispatchable load
- Price responsive multiple-block load
- Hourly committable generation

Market participants will need to meet incremental facility registration requirements to register facilities as one of the new resource "types" consistent with their physical characteristics and to support activities in the day-ahead market. These incremental facility registration requirements include provision of additional technical information regarding the resource types being registered.

Market participants will be able to register different load resource types behind a single delivery point.

No additional facility registration requirements for boundary entities to participate in the DAM have been identified.

No additional technical requirements regarding operational telemetry for load and generation facilities in regards to participation in the DAM have been identified so far. These technical requirements are based on the facility size and impact on reliable operation of the IMO-controlled grid, and are therefore not expected to change as a result of participation in the DAM.

Price responsive load facilities are expected to follow their DAM schedule in real-time unless otherwise directed by the IMO. For this reason, price-responsive load facilities will require dedicated voice communication capability with the IMO.

Another key element to facility registration is the identification of market participants and persons that have specific roles and responsibilities with respect to the market activities for a given facility. These roles include owner/operator, registered market participant and metered market participant. Due to the integrated nature of physical transactions and settlements for the day-ahead market and real-time market activities, only one person or market participant can fulfill each of these roles. For example, there can only be one registered market participant for a facility and that registered market participant would be responsible for submission of facility dispatch data in the day-ahead and real-time markets.

PART 4 – PROPOSAL (BY SUBMITTER)

Provide your proposed amendment. If possible, provide suggested wording of proposed amendment.

A separate section in the new Chapter 12 of the market rules should be created that prescribe the incremental facility registration requirements for the day-ahead market. Within this new section the following facility registration requirements for the day-ahead market would be included:

- For a facility already registered in the real-time market and that is to be registered in the DAM, obligate the market participant to meet the incremental day-ahead market facility registration requirements.
- Specify the incremental day-ahead market facility registration requirements this may be simply be a reference to the detailed requirements specified in other parts of the market rules e.g. Chapter 2 and 4 appendices.
- For a facility or boundary entity that is <u>not</u> already registered in the real-time market, obligate the market participants to meet both the real-time market and day-ahead market facility registration requirements.
- Permit a market participant to register multiple load types (e.g. price-responsive, price-sensitive) at a single delivery point and obligate the market participant to provide the required information for each load type registered and the maximum facility demand for all loads at that delivery point.

The following changes to the facility registration requirements for the real-time market (section 2 of Chapter 7) should be made:

- Section 2 of Chapter 7 should be amended to clarify that it relates to facility registration for the real-time market.
- Chapter 7 section 2.2.1A, which provides for facility registration prior to commencement of the IMO-administered market, is no longer relevant and should be deleted.

Within Chapter 11 – Definitions, the following resource types need to be defined, including eligibility criteria:

- Price-sensitive hourly or multi-hour load
- Price responsive dispatchable load
- Price responsive non-dispatchable load
- Price responsive multiple-block load
- Hourly committable generation

Appendices in Chapter 4 should be amended to identify the additional technical information required for facilities registering as one of the new load and generation resource types. For example a nondispatchable load wishing to submit multi-part offers in the DAM would need to provide the following additional information in order that its multi-part offers can be validated:

- Minimum generation limit
- Maximum loading ramp rate
- Maximum unloading ramp rate
- Normal Turnaround time
- Normal Minimum run time
- Normal Minimum down time

Appendix 2.2 should be amended to require a price responsive load facility to have normal priority path facility voice communication.

PART 5 - FOR IMO USE ONLY

Technical Panel Decision on Rule Amendment Submission		
MR number: MR-00266-Q00		
Date submitted to Technical Panel: 19 Aug 04		
Accepted by Technical Panel as: General Urgent Minor (please indicate with X) N/A Date: 24 Aug 04		
Criteria for acceptance: N/A		
Priority: High		
Criteria for assigning priority: N/A		
Not accepted (please indicate with X):		
Clarification/interpretation required (please indicate with X):		
Technical Panel minutes reference: IMOTP 148-1		
Technical Panel Comments: Three issues were raised by the Technical Panel:		
1. How frequently can a market participant change its facility registration data? What is the time lag between the time the revised data is submitted and the time the revised data is recognized by market systems?		
2. Can a market participant register both a load and a generation facility at the same delivery point?		
3. Consideration should be given to placing some or all of the technical information requirements contained in chapter 4 appendices in market manuals.		