

# Memorandum

**To:** Technical Panel

**From:** Darren Byers

**Date:** February 7, 2023

**Re:** Market Renewal – Energy Project Implementation: Interim Alignment: MR-00457-R00 to R03, MR-00461-R03

Attached for the Technical Panel’s review and consideration are market rule amendment proposals related to the Market Renewal Program (MRP) – Interim Alignment batch. This batch includes the following changes:

- Simplification of the structure of the participant authorization rules, merged obligations and a more aligned market rule and market manual content (MR-00457-R00);
- Further market rule and manual integration of definitions related to price responsive loads and definitions related to load, which were introduced as part of the first batch of MRP amendments – Market Entry and Prudentials (MR-00457-R01);
- Integration of electricity storage resources into previous MRP amendments (MR-00457-R02);
- Further integration of the new defined term ‘resource’ into the market rules (MR-00457-R03);
- Amendments to Chapter 11 defined terms to support this Interim Alignment batch of market rule amendments (MR-00461-R03).

Please note that amendments proposed in this batch are tracked against the previous, provisionally approved MRP batches, not the current market rule baseline. For a copy of these provisionally approved rules, please see the [MRP Consolidated Draft](#).

The IESO provided two question and answer sessions at the October 11<sup>th</sup> and December 13<sup>th</sup> Technical Panel meetings. At the December 13<sup>th</sup> meeting, Vlad Urukov noted two points from his review of these market rule amendment proposals during the stakeholder comment period:

- Mr. Urukov questioned why Chapter 5, section 4.4.4 was amended to refer to the ‘resource’, since in his view the term ‘resource’ was too specific. The IESO has amended this section to include a reference to the respective ‘facility’ and made further related edits to Appendix 5.1, section 1.1.6, and Appendix 4.24.

- Mr. Urukov commented on Chapter 2, section 6.3.1, that resources could be aggregated from multiple facilities for the purposes of compliance aggregation. The IESO has reworded this section to clarify that this section describes the requirements for physical aggregation of units into resources and does not deal with compliance aggregation.

On December 20<sup>th</sup>, the IESO posted responses to stakeholder comments received as part of stakeholder engagement on the Interim Alignment batch of proposed market rule and market manual amendments. In response to this feedback, the IESO has made incremental changes to the original September 9<sup>th</sup> version of the draft amendment proposals. A summary of the feedback with IESO responses can be found in [Stakeholder Feedback and IESO Response](#).

Lastly, as an information item and at the request of the Technical Panel, an additional summary of issues across all MRP batches raised by stakeholders during their review of the proposed market rules at the stakeholder engagement stage is attached. This MRP [Stakeholder Feedback Summary Report](#) provides an update on status, including IESO resolution or target resolution.

### **Recommendation – Priority**

The IESO recommends that the Technical Panel assign a regular priority to the development of these market rule amendment proposals.

### **Panel Action and Next Steps**

The IESO recommends that the Technical Panel vote to post the proposed market rule amendments MR-00457-R00 to R03 and MR-00461-R03 for stakeholder review and comment for a period of approximately one week ending on March 3, 2023. The IESO intends to request a Technical Panel vote to provisionally recommend the draft rule amendments at the March 21 Technical Panel meeting, depending upon the nature of any stakeholder comments received.

The target for provisional IESO Board approval is June 7, 2023.

### **Accompanying Materials**

- MRP Stakeholder Summary Report
- Market Rule Amendment Proposals;
  - MR-00457-R00; Market Manual and Batch Alignment Items
  - MR-00457-R01; Load Resources
  - MR-00457-R02; Storage Integration
  - MR-00457-R03; Resource Related Updates
  - MR-00461-R03; Defined Terms