

Memorandum

To: Technical Panel

From: Darren Byers, Senior Market Rules Advisor

Date: April 11, 2023

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

The IESO proposes to amend the market rules to integrate the Market Renewal Program’s (MRP’s) Interim Alignment batch. This batch furthers the codification of MRP by integrating amendments between previous batches and across market rules otherwise unaffected by MRP.

At the February 21st Technical Panel meeting, the Panel voted to post the proposed market rule amendments for the Interim Alignment batch for stakeholder review and comment. No stakeholder comments were received.

The IESO received some earlier feedback from the Electricity Distributors Association suggesting the IESO review defined terms to ensure that they were free of circularity, including the terms *load facility* and *embedded load facility* (see Item #56 in the [MRP Interim Alignment Stakeholder Feedback and IESO Response](#) and Item #4 in the [MRP Stakeholder Feedback Summary Report](#)). The IESO continues to review defined terms to refine proposed definitions and welcomes stakeholder feedback into specific areas that should be reviewed. With respect to the definitions of *load facility* and *embedded load facility*, the IESO’s view is that these terms are not circular and no modifications are necessary, as the references to *facility* (in the case of *load facility*) and *load facility* (in the case of *embedded load facility*) indicate that these facilities are subsets of the referenced defined term.

The only changes to the amendment proposals since the Panel’s last review are the following changes made to MR-00457-R03: Resource Related Updates to correct the following typographical errors:

- Appendix 5.1, section 1.3.4A – replaced “the *IESO* may direct such the *electricity storage unit*” with “the *IESO* may direct such *electricity storage unit*”;
- Chapter 7, section 2.4 – added a hyphen in the title, “De-registration of Facilities”;
- Chapter 7, section 21.8.3 – unitalicized “or”.

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

Panel Action and Next Steps

The IESO recommends that the Panel vote to provisionally recommend the proposed market rule amendments MR-00457-R00 to R03 and MR-00461-R03 to the IESO Board for provisional approval at its June 7, 2023 meeting. Per the Technical Panel Terms of Reference, Panel members will be asked to provide reasons for their stated positions.

As a reminder, a formal recommendation on the complete package of MRP amendments will only be sought from the Panel once stakeholders and Panel members have had an opportunity to review the entire suite of proposed MRP amendments.

Accompanying Materials

- 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; and
 - MR-00461-R03; Defined Terms.