

Feedback Form

Market Renewal Implementation – Replacement of Settlement System Draft Market Rules and Market Manuals – February 8, 2022

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the Implementation Engagement webpage unless otherwise requested by the sender.

Following publication on February 8, 2022 the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the draft batch of Market Rules and Market Manuals for the Replacement of Settlement System. The draft documents can be accessed from the [Implementation Phase documents webpage](#). Additionally, materials for the February 22, 2022 webinar where the IESO provided an overview of the documents can be found on the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by March 17, 2022. If you wish to provide confidential feedback, please mark the document "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Market Rules – Chapter 3

What feedback do you have on the Chapter 3 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	OPG has no comment at this time.

Market Rules – Chapter 6

What feedback do you have on the Chapter 6 draft market rule amendments?

Section / Topic	Feedback
Chapter 6.3, 1.4 Instrument Transformer Checks	1.4.3.c: What is the rationale for the revision of Metering Service Provider (MSP) testing frequency from once in six years to once every eighteen months?
Chapter 6.3, 1.5 Frequency of Routine Testing	1.5.3: What is the rationale for the revision of the routine test frequency of MSP from once every three years to once every eighteen months?

Market Rules – Chapter 7

What feedback do you have on the Chapter 7 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	OPG has no comment at this time.

Market Rules – Chapter 8

What feedback do you have on the Chapter 8 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	OPG has no comment at this time.

Market Rules – Chapter 9

What feedback do you have on the Chapter 9 draft market rule amendments?

Section / Topic	Feedback
6.3 Settlement Cycles	<p>General: OPG supports the extension of the Notice of Disagreement (NoD) timeline period from four to six business days as this will provide Market Participants (MPs) more time to identify settlement discrepancies.</p> <p>General: OPG supports the creation of a 23-month limitation period to issue the final re-calculated settlement statement (RCSS) to provide timely resolution of outstanding NoDs.</p>
	<p>General: OPG requests clarification for the following items:</p> <ol style="list-style-type: none"> 1. What changes will be made to the current on-line NoD Application and NoD review process? In particular, what changes will be made to the NoD submission process for (a) final statements and Final Settlement Statements (FSS); (b) RCSS? 2. How would MPs track NoD decisions within the same Preliminary Settlement Statement (PSS), FSS, and RCSS cycle dispute? For example, an MP may submit a NoD upon receiving the PSS, and the IESO could issue a RCSS based on the NoD resolution. However, the MP may dispute the results presented in the RCSS, and therefore would need to submit an additional NoD for the RCSS. In this scenario, the MP would need to submit two or more NoDs for the same settlement cycle dispute. What is the process for linking the NoDs together to track end-to-end results within the same settlement cycle? 3. Would the metering disagreement channel be updated as a result of Market Renewal Implementation, i.e. are there any planned enhancements to the IESO on-line tool to allow MPs to submit NoDs for metering data issues? Note that the current process is to submit Financial Statement NoDs to indicate a metering data issue. 4. Please clarify if the IESO will provide a new on-line tool for data submission.

Market Rules – Chapter 10

What feedback do you have on the Chapter 10 draft market rule amendments?

Section / Topic	Feedback
Click or tap here to enter text.	OPG has no comment at this time.

Market Rules – Chapter 11 Definitions

What feedback do you have on the new, modified, or deleted terms in Chapter 11?

Section / Topic	Feedback
Click or tap here to enter text.	OPG has no comment at this time.

General Comments/Feedback

OPG thanks the IESO for this opportunity to comment on the Market Renewal Implementation – Replacement of Settlement System (RSS) Draft Market Rules and Market Manuals.

In addition to the above specific comments, OPG has concerns regarding the proposed timeline for the publication of the Settlement Schedule and Payments Calendar (SSPC) and Schema/Sample files (June 2022), to sandbox testing (summer 2022) to full RSS implementation (Nov 1, 2022). RSS changes will be made in multiple areas such as: (1) existing charge code breakdown, (2) data-file content and format change, and (3) new charge code for OR, etc. MPs are required to review and implement the numerous changes within a very short time period (less than five months). OPG requests that the IESO release RSS changes and publish specification documents in multiple phases as they are finalized in advance of June 2022 (i.e., in April and May if possible). This will allow MPs to review and address the required system changes in a progressive and stepwise manner, as opposed to implementing all changes simultaneously.

In addition, the IESO is set to release detailed Settlement Specifications for the Market Renewal Program (MRP) in Q2 of 2022 for stakeholder input. OPG (and likely other MPs) will face significant challenges to review and implement RSS and MRP concurrently, as resources for both projects come from the same resource pool. OPG requests that the IESO takes into consideration the resource challenges when setting up implementation timelines.