

Stakeholder Feedback and IESO Response

Replacement of Settlement System: Market Rule Amendments & Market Participant Readiness Planning – February 22, 2022

Following the February 22, 2022 engagement session on Replacement of Settlement System [stakeholder engagement webinar](#), the IESO invited stakeholders to provide comments and feedback on the materials presented by March 17, 2022. The IESO received written feedback submissions from the following stakeholders which have each been posted in their entirety on the engagement webpage:

1. [Electricity Distributors Association](#)
2. [Ontario Power Generation](#)

Also, the presentation materials and [recorded session](#) have been posted on the IESO stakeholder [engagement webpage](#) for this engagement. If interested, please visit the webpage to reference the feedback submissions directly as the below uses excerpts and/or a summary of the stakeholder feedback for the purposes of providing an IESO response.

Please contact IESO Engagement at engagement@ieso.ca if you have any questions.

Electricity Distributors Association

Feedback	IESO Response
General Comments/Feedback: The EDA looks forward to the IESO providing training to all market participants on the changes to the RSS upon them being authorized by the IESO's Board of Directors. We anticipate that the provision of worked examples will be invaluable to LDCs and look forward to collaborating with	The IESO is working to release the Settlement Schedule and Payments Calendar (SSPC) and Schema/Sample files for RSS in June 2022 ahead of Market Trials. The IESO will make best efforts to release items as they are finalized and ready for distribution, and work closely with participants on readiness activities.

IESO staff to scope and explore the examples. We trust that LDCs will be able to leverage these training experiences to identify - and ideally operationalize - the associated changes to business processes and systems.

Ontario Power Generation

Feedback	IESO Response
<p>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?</p> <p>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?</p>	<p>Both of these changes are being made in support of the new limitation period for resettlement. As adjustments made pursuant to section 10.4 of Chapter 6 will not be implemented after the issuance of the final recalculated settlement statement for a particular trading day (subject to exemptions as noted in the rules), these changes ensure that any issues for a particular trading day are identified and corrected in time.</p>
<p>6.3 Settlement Cycles: 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?</p>	<p>The NOD application is being updated to support the ability to submit a NOD for a final settlement statement (FSS) and recalculated settlement statements (with the exception of the final recalculated settlement statement). Although the application will function similar to how it does today, there will be updates to the user interface. The NOD review process will largely stay the same.</p>
<p>6.3 Settlement Cycles: 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</p>	<p>As outlined in Section 6.8.15 of Chapter 9, if a market participant is dissatisfied with the outcome of a NOD, they can pursue the matter through the dispute resolution process outlined in Chapter 3. The NOD application will not provide market participants with the ability to link NODs. However, the market participant may identify any linkages in their description of the disagreement.</p>

<p>for linking the NoDs together to track end-to-end results within the same settlement cycle?</p>	
<p>6.3 Settlement Cycles: 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.</p>	<p>A notice of disagreement (NOD) should not be submitted for meter data issues, as specified in Section 6.8.12.7 of Chapter 9.</p> <p>Meter data issues should continue to be raised through the relevant procedures defined in Chapters 6 and 10. The metering disagreement channel streamlines the implementation of any resettlement as a result of those procedures, and will support the eventual rollout of the Market Renewal Program.</p>
<p>6.3 Settlement Cycles: Please clarify if the IESO will provide a new on-line tool for data submission.</p>	<p>The IESO is expanding the use of the Online Settlement Forms to support submission for:</p> <ul style="list-style-type: none"> • Alternate Regulation Services • Regulation Services • Prescribed Assets • On-demand update of Class A consumer peak demand factor for LDCs <p>All new forms will have data file upload capability and will allow for submission of supporting documents.</p> <p>The IESO has also enhanced some existing Online Forms to support submission via data file upload, including</p> <ul style="list-style-type: none"> • RPP Conventional Meter • Feed-in-Tariff (FIT)
<p>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</p>	<p>The IESO is working to release the Settlement Schedule and Payments Calendar (SSPC) and Schema/Sample files for RSS in June 2022 ahead of Market Trials. The IESO will make best efforts to release items as they are finalized and ready for distribution, and work closely with participants on readiness activities.</p>

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.