

Stakeholder Feedback Form: MRP Energy Detailed Design

Design Document: Market Power Mitigation

Feedback Due: July 24, 2020

Feedback provided by:

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The IESO is posting a series of detailed design documents which together comprise the detailed design of the MRP energy stream.

This design document is posted to the following engagement webpage: <http://ieso.ca/en/Market-Renewal/Energy-Stream-Designs/Detailed-Design>.

Stakeholder feedback for this design document is due on July 24, 2020 to engagement@ieso.ca.

Please let us know if you have any questions.

IESO Engagement

Section 3 Functional Design

Detailed Comment

- Other than an NCA or DCA, how can a resource determine if they are in a constrained area prior to submitting offers?
- What is the purpose of MWP mitigation? If a generator passes conduct and impact thresholds for offers, is it not then deemed to be a valid economic offer? Under what circumstances is a generator likely to receive MWP mitigation when dispatch data tests are passed?
- 3.6.2: Presumably the reference levels for each of the OR products could/will be different?
- 3.7.1.1 – Since only minimum load point (MLP) offers are used to determine commitment does commitment cost mitigation only mitigate energy offers up to MLP?
- 3.9 Physical withholding- How will the IESO differentiate the requirement to offer Energy and OR during circumstance where a generator may not be able to offer its maximum energy and OR simultaneously due to either contractual or equipment reasons?
- Will market participants be able to view their reference levels in advance of submitting offers in all submission windows? Will failed ex-ante tests (non-financial and/or financial) be notified to the participant immediately (ie a warning or error upon submission)? What is the process to override if required?
- Can you please confirm that an Energy Services provider for multiple separate customers would not be considered the Market Control Entity for the purpose of mitigation and/or conduct test?