

Feedback Form

MRP Implementation: Market Entry and Prudential Security

The IESO is posting a series of market rules and manuals documents as part of the implementation phase of the Market Renewal Program.

These documents are posted to the following engagement webpage: www.ieso.ca/en/Market-Renewal/Stakeholder-Engagements/Implementation-Market-Rules-and-Manuals-Engagement.

Stakeholder feedback for this batch of documents is due by April 6, 2021 to engagement@ieso.ca.

Feedback Provided by:

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Date: April 6, 2021

Feedback on Market Entry Governing Documents

Feedback on Market Rules	Feedback
Please include any views on whether the draft language related to Participant Authorization clearly articulates the requirements for either the IESO or market participants.	OPG has no comments at this time on the proposed changes to Chapter 2: Participant Authorization.

Feedback on Market Rules	Feedback
<p>Please include any views on whether the draft language related to Facility Registration clearly articulates the requirements for either the IESO or market participants.</p>	<ol style="list-style-type: none"> 1. Sections 2.1.1.4, 2.2.3c, and 2.2.6a Participants are required to provide additional information (materials, resource specific information, and supporting documentation) in sections 2.1.1.4, 2.2.3c, 2.2.6a respectively. OPG suggests that those lines be qualified with "as applicable or relevant", since every form of supporting information may not be applicable or relevant in all situations. 2. <i>Trade Off Function</i>: The term "trade off function" is used in sections 2.2.6.7, 2.2.7.5, and 2.2.8.1 of Chapter 7. The term is not defined in Chapter 11 <i>Definitions</i>. Either the term should be defined or, if the term is not a required submission in registration or technical data, perhaps it should be removed from Chapter 7. 3. <i>Facilities vs. Resources</i>: Throughout Chapter 7: <i>Facility Registration</i> and Chapter 11: <i>Definitions</i> the term "facility" is followed by the words "or", "or any", and "and its" associated resources. Can the IESO please review the documents to ensure consistency in references to the relationship between facilities and resources? Please confirm whether there is a possible instance of a facility with no associated resources. 4. Section 2.2.3c states: <p><i>"The IESO may reject values submitted by a market participant in accordance with this section 2.2 if the IESO determines that the facility-specific or resource-specific information submitted does not conform to the technical capabilities of the facility or any associated resources."</i></p> <p>During the March 23, 2021 Technical Panel meeting, the IESO explained that section 2.2.3c was being added to "clarify" the intent of an existing rule in Chapter 7 Section 2.2.3.2, which indicates that the IESO will approve a request to register a facility if "...the IESO is satisfied on reasonable grounds that the facility is capable of operating as described in the registration information or as otherwise provided by the market rules in respect of the relevant physical service".</p> <p>OPG suggests that if 2.2.3c is only intended to clarify the language in 2.2.3.2, then perhaps the two rules could be harmonized into one rule, to avoid redundancy.</p>
Feedback on Market Manuals	Feedback
<p>Please include any views on whether the draft language related</p>	<p>OPG has no comments at this time on the proposed changes to Market Manual Part 1.5: Market Registration Procedures.</p>

Feedback on Market Manuals	Feedback
to Market Manual 1.5 clearly articulates the requirements for either the IESO or market participants.	

Feedback on Defined Terms Governing Documents

Feedback on Market Rules	Feedback
<p>Please include any views on whether the draft language related to Chapter 11 Defined Terms clearly articulates the requirements for either the IESO or market participants.</p>	<ol style="list-style-type: none"> <li data-bbox="435 260 1515 793">5. <i>Market Control Entity (MCE)</i>: MCE is not defined, but is referenced throughout Chapter 7 <i>Facility Registration</i>. OPG also notes that the Market Power Mitigation and Facility Registration Detailed Design Documents include more details on the concept of MCE. However, the term is defined inconsistently across these documents. The definition in section 3.9.2 of the Market Power Mitigation document describes an MCE as an entity who "...is entitled to receive more than 50 per cent of the amounts paid to the market participant in respect of all energy and operating reserve transacted through the energy and operating reserve markets." This text is duplicated in section 3.6.1 of the Facility Registration document, but with a threshold of 10 per cent. The same sections contain identical threshold inconsistencies regarding the ability of an entity to elect directors and the share of profits received by entities (i.e., 50 per cent threshold in the MPM document, 10 per cent threshold in the Facility Registration document). The IESO should provide a consistent central definition of the MCE to allow MPs to accurately assess the market rules and design. <li data-bbox="435 840 1515 940">6. <i>Resource</i>: Please confirm whether the term "resource" includes energy storage resources. In its current state the definition refers only to generating units, loads, and boundary entities. <li data-bbox="435 987 1515 1234">7. <i>Shared Daily Energy Limit</i>: The term "Shared Daily Energy Limit" is defined as "...a registration parameter that indicates whether multiple generation units for one or multiple dispatchable hydroelectric generation resources registered by the same market participant draw water from the same forebay." In section 3.6.1 of the Facility Registration Detailed Design Document the term is defined at the level of resources, rather than units. Please clarify whether Shared Daily Energy Limit is defined at the resource level or unit level. <li data-bbox="435 1276 1515 1633">8. OPG also notes that some hydroelectric resources/units share a tailrace, rather than a forebay. The IESO should consider broadening the definition of Shared Daily Energy Limit to include resources/units that share a tailrace, perhaps as follows: <p data-bbox="483 1457 1515 1633"><i>"Shared daily energy limit means a registration parameter that indicates whether multiple generation units for one or multiple dispatchable hydroelectric generation resources registered by the same market participant draw water from the same forebay or are located such that their combined outflows may be limited or required due to their effect on total flows downstream."</i></p>

Feedback on Prudential Security Governing Documents

Feedback on Market Rules	Feedback
Please include any views on whether the draft language related to Prudential Security clearly articulates the requirements for either the IESO or market participants.	OPG has no comments at this time on the proposed changes to Chapter 2: Prudential Security.

Feedback on Market Manuals	Feedback
Please include any views on whether the draft language related to Market Manual 5.4 clearly articulates the requirements for either the IESO or market participants.	OPG has no comments at this time on the proposed changes to Market Manual Part 5.4: Prudential Support

General Comments/Feedback

OPG has no additional comments at this time.