

Member Vote and Rationale – Replacement of the IESO Settlement System

IESO Technical Panel, May 17, 2022

The vote to recommend the proposed market rule amendments (MR-00472-R00) for consideration to the IESO Board of Directors passed at the May 17, 2022 Technical Panel meeting.

MR-00472-R00 – Replacement of the IESO Settlement System

TP Member	Vote and/or Rationale
Nick Papanicolaou (Consumer)	Yes
Indra Maharjan (Consumer)	Yes
Forrest Pengra (Residential Consumer)	Yes
Emma Coyle (Generator)	Yes
Jason Chee-Aloy (Renewable Generators)	Yes

TP Member	Vote and/or Rationale
Jennifer Jayapalan (Energy Storage)	Yes - I voted in favour of recommending the proposed amendments to support the replacement of the settlement system. These amendments cover the intent of the change, adding clarity to the settlements disagreement and resettlement process.

TP Member**Vote and/or Rationale**

Vlad Urukov
(Generator)

Abstain - Guided by the Technical Panel Terms of Reference, a vote on any market rule amendment, including MRP Batches, is ultimately a contemplation on whether a proposed rule language meets the final design intent of a proposed change.

As stated by the IESO in a memorandum accompanying the proposed Rule Amendments dated May 17, 2022, the RSS replacement will “make a series of enhancements and add additional clarity to the settlement disagreement and resettlement processes”. As these processes equally involve the IESO and market participants who shadow settle, reconcile, and process IESO sourced data, statements and invoices, a comprehensive understanding of the proposed design is essential in order for participants to validate the proposed efficiencies and clarity reflected on their side.

The proposed rules seek to implement a change to the limitation period triggering a number of inextricably linked timeline changes related to the issuance of statements as well as a shortened period for testing of metering equipment; these were not presented with sufficient detail leaving some doubt to the sufficiency of the overall impact assessment and participant feedback. Additionally, the detailed rules contained boundary cases that introduced new settlement statements (“ad hoc”) and the continuation of the use of the Preliminary Statement for different trade date, where both cases could be seen to undermine some of the efficiencies of the recalculated settlement statement concept.

In summary, my reason for abstaining from voting is my interpretation that certain aspects of the proposed market rules, particularly ones that raise questions about overall process efficiency, were not discussed in sufficient detail with participants to comprehensively validate and harden the propose rules. I also note the implementation date of November and its proximity to year-end, an important fiscal event that relies on the success and accuracy of settlement and invoicing process, with a recommendation that the IESO ensures appropriate sandbox testing.

TP Member	Vote and/or Rationale
Robert Reinmuller (Transmitters)	Yes - I support the approval to submit to the Board as the IESO has completed additional stakeholdering and responded to comments from EDA and OPG. Given the tight schedule for June it is critical that we proceed and continue to consider minor fixes along the way.
Rob Coulbeck (Retailers or Wholesalers)	Yes
Dave Forsyth (Consumer)	Yes
Ron Collins (Energy Related Businesses and Services)	Yes
Sarah Griffiths (Demand Response)	Yes - Although I voted to recommend MRA to the Board, the comments on implementation and readiness are important and need to be reflected in the decision making/approval process.
Joe Saunders (Distributor)	Yes
David Short (IESO)	Yes