

Stakeholder Feedback and IESO Response

Market Renewal Program: Market Settlements, Metering, Market Billing and Funds Administration market rule amendment proposal – Vlad Urukov Written Comments

MR Section	Feedback
MR Ch.6 s.1.2.1	Is the reference to a single day-ahead market as compared to the plural real-time markets intentional. day-ahead also has multiple markets in the context of energy and OR. The inconsistency with market vs markets is observed throughout.
MR Ch.6 s.2.1.1.2a	Why is the word "registered" deleted. The Chapter 11 definition does not contain reference to registration. Do MSP not need to register to serve as such?
MR Ch.6 s.6.1.1	The settlement of the day ahead market, by virtue of it being forward looking", by definition can not relate to measured "energy". It is not clear why "day ahead" is included. RT balancing, has a DA component, but it is not measured.
MR Ch.9 s.2.1.2.3	There appears to be new practice of using "MR Ch..." as opposed to the current reference to sections, chapters etc.... Is this worthwhile as it introduces two different way to reference other sections, which may be source of confusion.
MR Ch.9 s.2.1.4	There is no "primary registered ..."; rather the current definitions have "Primary RWM" as RWM is part of the registered wholesale meter definition. Consider updating the definitions accordingly.
MR Ch.9 s.2.2.14.3b	Could you clarify what this means
MR Ch.9 s.2.3.2	The reference to "demand" doesn't seem very well aligned with the definition of "demand". Also to me metering data doesn't "serve"
MR Ch.9 s.2.4.1	Delete the first instance of the word "other"
MR Ch.9 s.2.4.6 MR Appendix Ch.9.2 s.1.2.1 and 1.2.5	Please explain what is this in reference to? App 9.2 has other uses of 's' and 'm' are these the same?
MR Ch.9 s.2.4.6	What is this section intending to do. Please explain. Further down 2.5.2 the same designation is used for a "resource" not "facility" as it is here. Why is 2.4.6.1 referring to "relevant meter" and 2.4.6.2 the "registered wholesale meter"?
MR Ch.9 s.2.5.2	See above re: resource vs facility Consider removing the first part of 2.5.2.2 which duplicates "the registered wholesale meter" – that is already captured in 2.5.2.1
MR Ch.9 s.2.7.1	Please confirm the intended applicability of "day ahead market" as other parts of the PBC section only speak to "energy" i.e., real time. Should there be some reference to "DA schedule"?
MR Ch.9 s.2.10.1	What is "other information" meant to capture.
MR Ch.9 s.2.8.1	Should this be "prices" as there are multiple interfaces. Or add "specified"

MR Section	Feedback
MR Ch.9 s.2.12.1	Settlement process is italicized elsewhere. Is it meant to be a defined term? The settlement amounts are the final product of settlements that uses settlement data. Why "provide directly" vs. "determine". Is the data in "shall provide this settlement data", the "variables, data,".. or the "settlement amounts"
MR Ch.9 s.2.14.1	Isn't it more accurate to say that the "admin prices" will be data provided to the "settlement process"
MR Ch.9 s.2.14.2	"real" should be italicized. Confirm the "real-time balancing" the only settlement amount that will need to be calculated at RT? What about PBCs? I also don't see "real-time balancing settlement"
MR Ch.9 s.3.1.1.1a	"real-time" should be italicized – also is "real time balancing" defined as per comment above?
MR Ch.9 s.3.1.6	Assuming 't' is interval, and T sum of 12 intervals in an hour, "t/T" should be defined by the time reader comes across it. Also is the /12 appropriately applied to AQEI, which is already marked as 't' – as in it's the injection within an interval, not an hour?
Reference to "hourly settlement amount"	Is there a move towards hourly settlement data. Currently a settlement statement is presented at the interval level with the associated AQEI and MCP (5 minute price). This will be a major change from current settlement process.
	I have see real-time markets (plural) signifying energy and OR markets elsewhere. Is there a standard approach?
MR Ch.7 s.21.2.1	"satisfy" vs "fulfill" – consider choosing one. Change ":" to "." MR Chapter vs Chapter inconsistency.
MR Ch.7 s.21.2.3	Add "the electricity storage participant shall fulfill"
MR Ch.7 s.21.2.2 vs. s.21.2.3	Is there a difference between "registered to participate in the energy market" and "registered to allow ... provide energy, operating reserve..." Why is OR listed in one and not the other. Consider making consistent. If leaving the below add "to" in front of "provide" "energy market" vs "energy markets" vs "energy market or the operating reserve market" – are these all the same?
MR Ch.7 s.21.3.2	Confirm that it makes sense to register a "facility" as a "resource".
MR Ch.7 s.21.4.2	What is the ramification if this MR is not followed? In old rules there is language re CMSC eligibility. If this condition is violated, what will happen to participant?
MR Ch.7 s.21.6.2	Should "accompanied by an offer to inject energy" not be a condition following the if? In other words, participants can offer OR if <ul style="list-style-type: none"> - There is an accompanying energy offer - The energy offer is for the entire hour (aside – how can an offer be for less than an hour?)
MR Ch.7 s.21.6.3.2	"nor an offer to provide operating reserve in the subsequent..." Can be read that a participant can not participate in OR two hours in two consecutive hours – consider rewording.
MR Ch.7 s.2.2.6A.4	"the resource" or "a resource"? If time lags can not be defined without a forebay, consider combining A.5 and A.5 into one
MR Ch.11 Definitions – class r reserve	Should "spinning" and non-spinning" be part of definition and italicized
MR Ch.11 Definitions – extended pre- dispatch operational commitment	An extended ...commitment is a defined term so consider changing "..or a previously extended..." as the "extended" is part of the definition
MR Ch.11 Definitions – day-ahead market	Why is "relevant" added?

MR Section	Feedback
MR Ch.11 Definitions – locational marginal price	What is the purpose of “other relevant location” – can there be a LMP not associated with the first two?
MR Ch.9 s.3.1.1.4	How is the “that are withdrawing” defined as storage can inject or withdraw from on interval to the next. Is M1 then also temporally defined and storage can be part of M1 one interval but be excluded from M1 in the next?
MR Ch.9 s.3.1.4	Will the _PRL term be misleading if this term is also used for self scheduling storage
MR Ch.9 s.3.1.2	Where are “S” and “B” defined? Is the S the same ‘s’ used in s.3.1.2 the same ‘s’ used in s.2.5.2?
MR Ch.9 s.3.2.3	Confirm the /12 applies to both AQEW and DAM_QSW in brackets, as elsewhere the treatment is different consistent with AQEW being an interval reading.
MR Ch.9 s.3.3.2.1	Can you clarify compensation of GOG-eligible resource when activated for OR? Want to understand why this only applies to boundary entity resources
MR Ch.9 s.3.3.2.2	Could you confirm that the make whole payment for any interval is sufficient to cover costs. In other words, confirm that the computation of a balancing credit will not be lower than the respective MWP.
MR Ch.9 s.3.3.4	Add “is” – and is calculated or “which is calculated as follows”. Can you clarify the subtraction of DAM_QSI which is not based on interval (no subscript t) and AQEI which is. This is an hourly value which is obtained by calculating 12 intervals and dividing 12, how does this fit with the language that excludes intervals with MWPs – i.e., does it make sense to divide by 12 if fewer than 12 intervals are included?
MR Ch.9 s.3.3.5	Consider capitalizing “max” for consistency. Remove the dotted box subscript placeholder of the BCOR sigma sign.
MR Ch.9 s.3.3.5.1	With offers being part of the Operating Profit function and the function calculating across multiple PQ pairs – can you confirm all Ps will be adjusted. Is this adjustment also explicitly part of the formula of the OP term or only stated here. Also elsewhere there is a reference to “offer price”, not offer - see DA MWP section
MR Ch.9 s.3.4.1	Should it be storage resources that are injecting rather than withdrawing? Why are hydroelectric resources explicitly flagged here. The dispatchable ones are by default part of dispatchable resources. Is this saying that non-dispatchable hydro is included? Adds confusion.
MR Ch.9 s.3.4.1 and s.3.4.1.2	Is it appropriate that MWP excludes all hydro with linked forebays? Why? That “have” attained and “their” as resources is plural Why is “Attained Max Starts” capitalized? Is economic operating point defined (not italicized)
MR Ch.9 s.3.4.3.1	Confirm that the adjustment will replace any negative offer price with the lesser of zero and a
MR Ch.9 s.3.4.4.2	Can the connection between “called capacity export” called and the generator resource referenced in a and b be made more clear.
MR Ch.9 s.3.4.4.4	Confirm applicability is hourly.
MR Ch.9 s.3.4.6	Is the term “binding combined cycle physical unit constraint” well understood as it is not defined
MR Ch.9 s.3.4.4 vs. s.3.4.5	Is there a difference between “shall not be paid for” and “shall not be eligible to receive” – if not, consider making consistent. Confirm 3.4.4. applies to both energy and OR whereas 3.4.5 is only for energy