

December 2, 2020

Independent Electricity System Operator
120 Adelaide Street West, Suite 1600
Toronto, ON
M5H 1T1
Attn: Mr. L. Kula
Vice-President Planning, Acquisition and Operations, and Chief Operating Officer

Dear Mr. Kula,

Re: Market Renewal Detailed Design Phase - Final Feedback Review

Ontario's local distribution companies (LDCs) are the face of the industry to the overwhelming majority of the end users in the province: they serve over 5,000,000 customers and in 2019 delivered approximately 125 TWh – or about 90% - of all the electricity used in the province.

These are the comments of the Electricity Distributors Association (EDA) on the Independent Electricity System Operator's (IESO) Detailed Design for Energy – Market Renewal Program (MRP). Our focus is on matters directly relevant to LDCs, that the IESO will assign non-dispatchable load (NDL) status when MRP is deployed, and LDC-connected customers. Our objectives are:

- to identify improvements to the Detailed Design, and
- to provide constructive comments that will support the transition from Detailed Design to Implementation.

In accordance with the IESO's stakeholder engagement plan for the MRP, the IESO is accepting additional commentary on all draft Detailed Designs given the recent publication of the last draft Detailed Design document on September 30, 2020. Upon review of the complete package of draft Detailed Design documents, the EDA offers the following incremental commentary that should be read along-side our original feedback submissions to the IESO:

Publishing and Reporting Market Information (v1.0)

a) Standardized terminology

As was stated in our earlier comments, we request that the IESO consistently use its standardized terminology. As an example we point to Tables 3-8 and 3-10 that provide a list of Day-Ahead Market (DAM) Price Reports and a list of Real-time (RT) Price Reports that use terminology that is different than that used in other Detailed Design Documents; for example, "DAM Hourly Ontario Zone Energy Price" rather than "DAM Ontario Zonal Price".

b) Omission of Load Forecast Deviation Charge (LFDC)

Also as was stated in our earlier comments, we request that the IESO ensure that all data is clearly and completely referenced. As an example, the LFDC that is to be used by the IESO when it settles with an NDL is not referenced in this Detailed Design document. We suggest that the LFDC be added to Table 3-10: Real Time Pricing Reports, and that Section 4 be amended accordingly.

c) Clarifying granularity of data in Demand Reports

Again, as set out in our earlier comments, the document does not describe the level of granularity that will be reported. See Table 3-12 that summarizes Demand Reports produced. NDL settlement requires the DAM quantity scheduled for withdrawal (DAM_QSW) for NDLs and hourly demand response resources that are not price responsive loads to calculate the LFDC. It is unclear whether IESO's Demand Reports will summarize DAM_QSW.

Market Billing and Funds Administration (v1.0)

d) Omissions of NDL settlement amount

A specific example of an omission is found in Market Billing and Funds Administration (v1.0), at Table D-1 that it omits reference to the Hourly Physical Transaction Settlement Amount for NDLs (HPTSA_NDLs). We suggested adding the HPTSA_NDLs to Table D-1.

Next steps

We thank you for the opportunity to provide this incremental feedback. This feedback should not be interpreted as the EDA's final feedback on the Detailed Design. The EDA urges the IESO to provide additional details with respect to the IESO's process for finalizing the Detailed Design, as well as additional details for the implementation phase and we look forward to the IESO issuing updated Detailed Design documents for stakeholder review.

Should you have any questions, please feel free to contact Kathi Farmer, the EDA's Senior Regulatory Affairs Advisor, at kfarmer@eda-on.ca or at 416-659-1546.

Sincerely,



Teresa Sarkesian
President & Chief Executive Officer