

Stakeholder Comment Request – Draft Market Rules and Market Manuals

MR-00439-R00-05 – Transitional Capacity Auction

<p>Date Submitted: 2019/06/05</p> <p>Feedback Due: June 5, 2019</p>	<p>Feedback provided by:</p> <p>Company Name: ___Northland Power Inc. _____</p> <p>Contact Name: ___Michael Zajmalowski_____</p> <p>Phone: _____</p> <p>Email: _____</p>
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Please provide comments relating to the section of the draft amendment proposal in the corresponding box. Please include any views on whether the draft language clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language below and red-lining the suggested changes.

MR Chapter	Design Element (MR section)	Stakeholder Comments
2	Participation	No comments
2 (app)	Appendices	No comments
3	Administration, Supervision, Enforcement	No comments
7	System Operations and Physical Markets	No comments

9	Settlements and Billing	No comments
11	Definitions	<ul style="list-style-type: none"> • <i>capacity auction participant</i> means a person that is authorized to participate in a <i>capacity auction</i> <ul style="list-style-type: none"> ▪ Is a person here an actual person identified in Online IESO or is this meant to be a Registered Market Participant? • <i>capacity auction zonal constraints</i> means the minimum or maximum amount of <i>auction capacity</i> that a <i>capacity auction</i> seeks to clear for a specific electrical zone as detailed by the <i>IESO</i> in each pre-auction report; <ul style="list-style-type: none"> ▪ Is there a better way to say “clear” seems kind of vague? • <i>capacity generation resource</i> means a <i>capacity auction eligible generation resource</i> with respect to which a <i>capacity market participant</i> has allocated a percentage of a <i>capacity obligation</i> received in the given <i>capacity auction</i> in accordance with the applicable <i>market manual</i>. <ul style="list-style-type: none"> ▪ This definition sort of reads circular and seems to refer to many other defined terms within the definition, to the extreme. I just find myself re-reading it and going dizzy. • <i>qualified capacity</i> means a quantity in megawatts representing the maxim <i>capacity auction offer</i> that a <i>capacity auction participant</i> may provide for an applicable <i>obligation period</i>, and which corresponds to an amount submitted to the <i>IESO</i> by the <i>capacity auction participant</i> for qualification during the pre-qualification period of a relevant <i>capacity auction</i>. <ul style="list-style-type: none"> ▪ Spelling mistake on maximum

MM	Design Element (MM section)	Stakeholder Comments
1.1	Participant Authorization	<i>"Capacity Auction"</i> appears as plural (<i>Auctions</i>) in some sections, however it appears it should be singular as per the defined term.
1.2	Facility Registration	<i>"Capacity Generation Resource"</i> appears as plural (<i>Resources</i>) in some sections, however it appears it should be singular as per the defined term.
1.3	Identity Management	No comments
2.10	Connection Assessment	No comments
4.3	Real-time Scheduling of the Physical Market	No comments
5.4	Prudential Support	No comments
5.5	Physical Market Settlement Statements	No comments
6	Participant Technical Reference Manual	No comments
7.3	Outage Management	In section 4.1.5 – Testing of Capacity Generation Resources The IESO indicates it will give participants notice "one day in advance" of a test. To manage costs and delivery obligations the more notice provided, the more options participants have to secure gas including the services needed to deliver the gas reliably. Purchasing gas on a day-ahead basis requires as much lead time as possible. Preferably, the IESO would provide notice prior to 9 a.m. on the day prior to dispatch for a capacity test for the Capacity Generation Resource to secure the required amount of gas for the following day's run.
12	Definitions	No comments

Stakeholder comment is requested on the following IESO directed questions that will be forwarded to Technical Panel for their consideration in the recommendation of market rules to the IESO Board of Directors:

Question	Stakeholder Comment
Do you believe there is a clear and common understanding of the intent and purpose of the draft market rule amendment?	
In your view, is this market rule amendment in the interest of consumers with respect to prices?	
In your view, is this market rule amendment in the interest of consumers with respect to the reliability of electricity service?	
In your view, is this market rule amendment in the interest of consumers with respect to the quality of electricity service?	
In your view, are there any adverse effects (not identified in a previous answer) that may be caused by implementing these proposed changes, either to consumers or market participants.	
General Comments:	