

Stakeholder Comment Request – Draft Market Rules and Market Manuals

MR-00439-R00-05 – Transitional Capacity Auction

Date Submitted: 2019/06/05 Feedback Due: June 5 th , 2019	Feedback provided by: Company Name: Enel X Contact Name: Sarah Griffiths Phone: [REDACTED] Email: [REDACTED]
---	---

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	<i>Note: Enel X supports the comments submitted by AEMA. The comments below are in addition.</i>
2 (app)	Appendices	
3	Administration, Supervision, Enforcement	
7	System Operations and Physical Markets	- The MW that have qualified for the auction by resource type should be published in advance of the auction. The IESO is doing this for the DRA, but

		<p>this requirement should be formalized.</p> <ul style="list-style-type: none"> - Contingent offers should be allowable (eg. An offer that clears for winter 2020-2021 if and only if a given offer clears for summer 2020). When capacity needs change greatly from season to season, it needs to be ensured that a 'lopsided' obligation is not cleared that is large in one season, and small in another. - Enel X recommends a discussion take place for expanding transfers to different resource types. The IESO is procuring a capacity product. If all capacity is the same across resource types, and the transferee is qualified the position and no zonal constraints are triggered, the transfer should not be rejected. <p>Specific Sections:</p> <ul style="list-style-type: none"> - s. 18.9 – it should be specified that the transferor and the transferee can be the same capacity market participation in the case where a CMP chooses to transfer part of its obligation from one zone to another. - s. 19.4 In Market Manual 7 Part 7.3 Outage Management, there is language specifying that a CMP can request an alternate test date and submit an outage. This language should be included in the market rule. - s. 19.4.13 – Enel X would recommend that the IESO provide the exact hours of the test. - s. 19.4. 15 – Due to the discussion on payments to loads, this section may need to be removed until the issue is dealt with.
9	Settlements and Billing	<ul style="list-style-type: none"> - s. 4.8.3 – Enel X recommends changing “any compensation” to read “any adjustment” similar to section 4.8.4. It is arbitrary and capricious for the treatment of billing errors to be asymmetrical depending on which party owes a net-payment. Enel X views this difference in language as an error and requests that the market rule be amended accordingly.
11	Definitions	

1.1	Participant Authorization	<i>Stakeholder comments to be included here.</i>
1.2	Facility Registration	
1.3	Identity Management	
2.10	Connection Assessment	
4.3	Real-time Scheduling of the Physical Market	
5.4	Prudential Support	
5.5	Physical Market Settlement Statements	
6	Participant Technical Reference Manual	
7.3	Outage Management	
12	Definitions	<p>s. 4.3 similar to the comment for Chapter 7 of the Market Rules, the IESO should publish a report of qualified capacity by resource type in advance of the auction.</p> <p>s. 5.3 – Enel X assumes that in error, generators were excluded from the public Post-Auction report. All resources should be treated in a similar manner and therefore, should be included in the public Post-Auction report.</p> <p>s. 6.1 – The Market Rule says that portions of a capacity obligation may be allocated to registered resources, and that the total allocation must be equal to the capacity obligation. Enel X asserts that MW should be transferable between resource types. As well, within a given resource type it should be possible to allocate an obligation across multiple resources.</p> <p>s. 6.2.1 – Due to discussions in the DRWG, the requirement for Record of Installation (ROI) should be struck.</p> <p>s. 9 – Similar to Chapter 7 recommended changes, it should be specified that the transferor and the transferee can be the same capacity market participation in the case where a CMP chooses to transfer part of its obligation from one zone to another.</p>

		For Phase II, a discussion should occur for the transferring of MW from one type to another. The same logic for being able to transfer across zones, can be applied to across resource types. Enel X looks forward to further discussions on this topic.
--	--	--

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?	Enel X supports the comments submitted by AEMA.
In your view, is this market rule amendment in the interest of consumers with respect to prices?	Enel X supports the comments submitted by AEMA.
In your view, is this market rule amendment in the interest of consumers with respect to the reliability of electricity service?	Enel X supports the comments submitted by AEMA.
In your view, is this market rule amendment in the interest of consumers with respect to the quality of electricity service?	Enel X supports the comments submitted by AEMA.
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:

Enel X, (formerly EnerNOC), is a trusted partner helping Ontario enterprises develop, execute, and refine customized energy management strategies to reduce costs, and manage risk. Enel X is the global leader in demand-side flexibility services, providing large energy users and businesses access to more demand response and demand management participation in markets worldwide than any other provider. EnerNOC has worked with businesses in Ontario since 2008 and is a market participant in the IESO market, active in the Demand Response Auction.

Enel X supports the feedback submitted by AEMA. Due to time constraints, these additional comments were not discussed with the AEMA membership.