

Stakeholder Feedback and IESO Response

Market Renewal Program: Final Alignment market rule amendment proposals – Technical Panel September 10, 2024

ID	MP	Section	Feedback	IESO Response
1.	Vlad Urukov-July	MR Ch.0.1 s.A.1.4	<ol style="list-style-type: none">1. Please use either “in effect before” or in “effect prior” for consistency2. Is “in effect” an appropriate term in relation to “breach, non-compliance offense or violation”?3. As a follow up to the above, what will be the treatment if a breach, for example, straddles the timeframe of transition and the new rules affect the breach itself.4. Add “;” at the end of A.1.4.35. Replace “,” with “:” at end of A.1.4.4	<ol style="list-style-type: none">1. For consistency of language within section A.1.4, the IESO has replaced “in effect before” with “in effect prior to” in section A.1.4.1 as suggested. The update has been applied throughout the Final Alignment documents, as applicable.2. Yes, “in effect” in section A.1.4.3 refers to the market rules and market manual baselines in effect at the time that the alleged breach, non-compliance, offense, or violation occurs. Section A.1.5 provides further clarity that an investigation, proceeding, or remedy may be commenced, continued, or enforced, and any sanction or penalty imposed, as if the legacy market rules had not been revoked.3. Excluding conduct related to registration and establishing MPM reference level values, if non-compliant conduct begins prior to the market transition and continues after the market transition commences, the market participant may be subject to compliance investigation and sanction under the legacy market rules for alleged breaches that occur prior to the market transition and the renewed

ID	MP	Section	Feedback	IESO Response
				<p>market rules for alleged breaches that occur following the commencement of the market transition. The renewed market rules will govern any alleged non-compliance related to registration and establishing MPM reference level values, regardless of when the alleged breaches occur.</p> <p>4. The IESO has updated A.1.4.3 as suggested. The update has been applied throughout the Final Alignment documents, as applicable.</p> <p>5. The IESO has updated A.1.4.4 as suggested. The update has been applied throughout the Final Alignment documents.</p>
2.	Vlad Urukov-July	MR Ch.0.1 s.A.1.5	Section A1.4.3 describes “breach, non-compliance, offence or violation”... whereas A1.5. refers to “investigation, proceeding or remedy” - these are not the same. Please clarify in terms of what is “described” in subsection A.1.4.3	Section A.1.5 preserves the IESO’s authority to commence, continue, or enforce any investigation, proceeding, or remedy pertaining to any breach, non-compliance, offense, or violation referred to in section A.1.4.3. We have revised the section accordingly.
3.	Vlad Urukov-July	MR Ch.0.1 s.8.1.1.3	Can the IESO confirm that “facsimile” is still an acceptable (and preferred?) means of communication in terms of available communication infrastructure. If not consider updating where relevant. See deletion in Ch 8 for TRs	Facsimile was removed in Chapter 0.8 as this referred to a single line of business within the IESO who could confirm that facsimiles are no longer used in their operations. This section in Chapter 0.1 is broader in that it pertains to all notifications effected under the market rules, unless stated otherwise. As it was beyond the scope of MRP to determine if some business units continue to accept facsimiles, this section was left as is, and the suggestion will be noted for future non-MRP amendments.
4.	Vlad Urukov-July	MR Ch.0.1 s.10A.2.1	Replace “;”after 1998 with “,”	The IESO has made the suggested change.

ID	MP	Section	Feedback	IESO Response
5.	Vlad Urukov-July	MR Ch.0.1 s.10A.3	OPA no longer exists as an entity. Consider revising.	As this section pertains to the General Conduct Rule, it is out of scope for MRP to make such a revision. The suggestion will be noted for future, non-MRP amendments.
6.	Vlad Urukov-July	MR Ch.0.1 s.12.1.5	Can the IESO comment on the status of IBs in the new market. Are they considered part of market manuals? Some IBs comment on market rules and will be impacted by MRP.	Interpretation Bulletins explain how the IESO interprets or applies the market rules. They are binding on the IESO and offer certainty to market participants. They are not market manuals, which provide procedural and administrative detail regarding the obligations set out in the market rules. The IESO is currently reviewing the two current Interpretation Bulletins to identify any impacts with MRP.
7.	Vlad Urukov-July	MR Ch.0.2 s.B.1.1	What is the criteria for data sufficiency? Is it a certain number of days or billing cycles? A “billing period” is a period of calendar month. Can you confirm if the three most recent periods will include invoiced transactions or most recent transactions. For extra clarity, if MRP is live on May 1, 2025 how is the 3 billing period determined?	During the MRP cutover period, the Market Participant Prudential System (MPPS) will be temporarily inactive/unavailable for the first six days of the new market. During this period, all of the components of a market participant’s actual exposure as specified in MM2.3 Prudential Support, (sections 3.1 Estimating Actual Exposure for Physical Transactions, 3.1.1 Cleared-But-Not Settled or Six-Day Activity Estimate for Physical Transactions, 3.1.2 Settled-but-Not-Invoiced for Physical Transactions, and 3.1.3 Prepayments) will be unavailable. During this period, the IESO will utilize the estimated actual exposure methodology based on the average of the three most recent invoices in which a market participant has conducted physical transactions for energy, until the MPPS is available. Upon MRP go-live on May 1, 2025, the three most recent energy market billing periods will be based on the last 3 issued physical market invoices issued to market

ID	MP	Section	Feedback	IESO Response
				participants. For the majority of market participants, this will be the January, February and March 2025 invoices issued by the IESO.
8.	Vlad Urukov-July	MR Ch.0.2 s.1.2.2.7	I think “has disclosed to the” was deleted in error? If not, further changes are required to correct wording.	Thank you – this typographical error only exists in one of the supplemental documents, and does not exist in the formal amendment proposal.
9.	Vlad Urukov-July	MR Ch.0.2 s.3.1.2.1	Italicize “application for authorization to participate” in 3.1.2	Thank you – this typographical error only exists in one of the supplemental documents, and does not exist in the formal amendment proposal.
10.	Vlad Urukov-July	MR Ch.0.2 s.4.1.4	Fix reference	<p>The formatting errors with the cross references within section 4.1.4 have been corrected, with the re-insertion of cross references to sections 4.1.1 and 4.1.3.1 as follows:</p> <p>4.1.4 The <i>IESO</i> may, at any time and in its sole discretion, amend a conditional order issued pursuant to section 4.1.1 to include an additional condition, to remove a condition, or to extend the date stipulated pursuant to section 4.1.3.1.</p>
11.	Vlad Urukov-July	MR Ch.0.2 s.4.1.11	What about 4.1.6 and 4.1.8 – these should be added as items that can be disputed by a participant.	The dispute resolution regime set forth in MR Ch.0.3 s.2 applies to any dispute between the IESO and any market participant which arises under the market rules, market manuals or any standard, policy or procedure established by the IESO pursuant to the market rules. Actions taken and orders made pursuant to Ch.0.2 s.4.1.6 may be disputed by a market participant without these sections being explicitly set out in Ch.0.2 s.4.1.11.

ID	MP	Section	Feedback	IESO Response
				The cross references have been updated and now include 4.1.8.
12.	Vlad Urukov-July	MR Ch.0.2 s.5.2.5	The change from “section” to “s.” doesn’t seem to be consistently applied in 5.2	The updated style is that section references within the same chapter are spelled out ‘section’. The abbreviation ‘s.’ or ‘ss’ are only used where the reference is to another chapter.
13.	Vlad Urukov-July	MR Ch.0.2 s.5.2.3	Word “section” is duplicated in last line.	For clarity, the phrase “of this section, section 5C, section 5D and MR Ch.2 App2.3” has been replaced with “of section 5, section 5C, section 5D and MR Ch.2 App2.3.” The wording “of this section” is not a duplication, but a reference to the existing section 5 of Chapter 0.2.
14.	Vlad Urukov-July	MR Ch.0.2 s.5.1.3	This section 5.1.3 is very confusing and difficult to understand as to what is applicable. Consider if there is a way to make it easier to read.	<p>This section 5.1.3 – “Application,” is intended to clarify to market participants which sections of the prudential market rules are applicable to them, depending on the market participant’s authorization to conduct one or any combination of day-ahead market physical transactions, real-time market physical transactions, or day-ahead market virtual transactions as follows:</p> <ul style="list-style-type: none"> • Section 5.1.3.1 – sections 5.1 and 5.2 which are overarching, general provisions for prudential support apply to market participants authorized to conduct physical transactions or virtual transactions, or both. The one exception for market participants authorized to conduct virtual transactions, is section 5.2.6, which is related to reductions for physical transactions only; • Section 5.1.3.2 – for market participants authorized to conduct only physical transactions, sections 5.3 to 5.8 which are based on today’s prudential regime (calculations of trading limits, default protection amount, maximum

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				<p>net exposure, good payment history and credit rating reductions) continue to apply;</p> <ul style="list-style-type: none"> • Section 5.1.3.3 – section 5C on virtual transactions apply to market participants authorized to conduct virtual transactions in the day-ahead market; • Section 5.1.3.4 – for market participants authorized to conduct both physical transactions and virtual transactions, this section specifies that the consolidated actual exposure and monitoring requirements in section 5D apply. <p>The IESO is of the view that this section is clear as written.</p>
15.	Vlad Urukov-July	MR Ch.0.2 s.5.2.8	Confirm there are Market Rules that obligate the IESO to send such notice (“notice of the exercise by the IESO...”) along with applicable timelines.	The IESO confirms that the market rules allow the IESO to send various notices, upon an event of default for a market participant. The language “of receiving notice of the exercise by the IESO of such rights” has not changed with MRP, and is existing market rules language. The various notices that the IESO may send, along with the associated timelines, are specified in Chapter 0.3 section 6.3 of the market rules.
16.	Vlad Urukov-July	MR Ch.0.2 s.5.3.12	<p>(a) Remove comma after physical transaction.</p> <p>(b) Make language consistent between “for physical transactions” and “in respect of physical transactions”</p>	<p>(a) Thank you. The IESO will integrate this suggestion in a future amendment.</p> <p>(b) Thank you for the suggestion. The IESO believes the current drafting is sufficiently clear.</p>
17.	Vlad Urukov-July	MR Ch.0.2 s.5.4.1	Confirm there is clarity of treatment of market participants who are also “virtual traders”. Do the “virtual traders” have to have an active virtual position or only be registered as a “virtual trader”?	The IESO is of the view that the phrase “that is not a virtual trader” is clear, since the definition of “virtual trader” is defined in Chapter 0.11 of the market rules as “a market participant authorized to conduct virtual transactions”. Therefore, to be a virtual trader, the market participant does not have to have transacted in virtual transactions, and only needs to meet the condition of being authorized to conduct virtual transactions.

ID	MP	Section	Feedback	IESO Response
18.	Vlad Urukov-July	MR Ch.0.2 s.5.5.1.2(a.)	The word “thereof” was deleted in 5.5.1.1 a). Consider deleting in 5.5.1.2. as well	The IESO has deleted “thereof” in section 5.5.1.2a as suggested. For consistency, ‘applicable’ has also been added before IESO payment date.
19.	Vlad Urukov-July	MR Ch.0.2 s.5.2.10	Propose to move this to 5.1, rather than at the end.	The IESO will keep s.5.2.10 as drafted in order to minimize changes which could result in the creation of unintended cross-referencing errors.
20.	Vlad Urukov-July	MR Ch.0.2 s.5.3.2	With the deletion of “at least 7 business days”, what is the applicable period for submission of a trading limit.	This change was made to provide market participants with increased flexibility and removes the deadline for market participants to submit their self-assessed trading limits at least 7 business days prior to the start of a billing period. The change allows a market participant to submit a self-assessed trading limit at any time during a billing period.
21.	Vlad Urukov-July	MR Ch.0.2 s.5.3.4.1	Change first “that” to “the”	The provision is correct as drafted.

ID	MP	Section	Feedback	IESO Response
22.	Vlad Urukov-July	MR Ch.0.2 s.5.3.4, 5.3.4.1	Confirm that this limit will use “energy market billing periods” that are in effect prior to the implementation of MRP	The frequency of margin calls per energy market billing period is an assessment made on a monthly basis. The IESO confirms that such assessment could have been made for a market participant prior to the implementation of MRP. This ongoing assessment will continue post MRP implementation.
23.	Vlad Urukov-July	MR Ch.0.2 s.5.3.6	Is there a need to add for the “remainder of the current”, given that 5.3.6.2 refers to the limit that is already in effect for the current period?	The IESO agrees that the language “remainder of the current or” is unnecessary, and has deleted this language.
24.	Vlad Urukov-July	MR Ch.0.2 s.5.3.7	Does this deletion mean a participant can request to change its trading limit?	Correct. As specified above in the response to ID#20, the revisions to MR Ch.0.2 s.5.3.2 provide market participants with the flexibility to submit or revise their self-assessed trading limit at any time during a billing period. As a result, existing section 5.3.7 which prevents a market participant from changing their trading limit during the upcoming energy market billing period is no longer required and has been deleted.
25.	Vlad Urukov-July	MR Ch.0.2 s.5.3.8.2	Does this apply to retailers as per 5.2.10?	The IESO confirms this is correct.

ID	MP	Section	Feedback	IESO Response
26.	Vlad Urukov-July	MR Ch.0.2 s.5.3.8A, 5.3.8B	Confirm this section is also rendered unusable as per removal of PBC functionality.	The IESO confirms this is correct.
27.	Vlad Urukov-July	MR Ch.0.2 s.5.3.10A.1	Suggest clarifying that is for “all hours” in a. Also is a. needed if there is no b.? Suggest combining into one.	<p>The IESO has amended section 5.3.10A.1(a.) as suggested:</p> <p>a. In respect of each delivery point and all settlement hours over the preceding three-year period, the greater of the locational marginal price in the day-ahead market and the hourly average locational marginal price in the real-time market;</p> <p>For consistency, the same change has been made to section 5.3.10A.2(a.).</p> <p>Thank you for your comment. The IESO will review this and other similar instances in the market rules and will consider adjusting the drafting convention in general.</p>
28.	Vlad Urukov-July	MR Ch.0.2 s.5.3.10A.3	Shadow prices are not subject to +/-MMCP. As such, there may be significant distortions in both positive and negative direction. Suggest implementing a cap.	<p>For the purposes of determining the price basis in section 5.3.10A.3, the shadow prices will be capped at the +/-maximum market clearing price (i.e. +/- \$2,000) as suggested. The amendment will be made in Market Manual 0.5.4.</p> <p>Market Manual 0.5.4 – Prudential Support (Determining the Trading Limit and Default Protection Amount for Physical Transactions) has been updated to add this detail.</p>

ID	MP	Section	Feedback	IESO Response
29.	Vlad Urukov-July	MR Ch.0.2 s.5.3.11	There is an extra “,” or an extra “and”.	The IESO has deleted the extra “and” prior to “the trading limit” as suggested.
30.	Vlad Urukov-July	MR Ch.0.2 s.5.3.12	Extra “,” after “transactions”	Thank you. The IESO will integrate this suggestion in a future amendment.
31.	Vlad Urukov-July	MR Ch.0.2 s.5.6.1, 5.6.5, 5.6.7	It is difficult to assess applicability of subsections in 5.6 in relation to “virtual trading” as some sections are qualified as “...not a virtual trader”, others” not an energy trader” and “authorized to conduct virtual transactions”.	<p>The IESO confirms that the qualifiers are used appropriately in MR Ch0.2 s.5.6.</p> <p>The definition of “virtual trader” is defined in Chapter 0.11 of the market rules as “a market participant authorized to conduct virtual transactions”. For consistency, the IESO has replaced within section 5.6.7 the phrase “is also authorized to conduct virtual transactions” with “is also a virtual trader.”</p> <p>Please note that a “virtual trader” and “energy trader” are separate and distinct, and are defined in Chapter 0.11 of the market rules:</p> <p><i>energy trader</i> means a <i>market participant</i> authorized by the <i>IESO</i> to participate in the <i>energy market</i> by importing, exporting, and wheeling <i>energy</i> or <i>operating reserve</i>;</p> <p><i>virtual trader</i> means a <i>market participant</i> authorized to conduct <i>virtual transactions</i>.</p>

ID	MP	Section	Feedback	IESO Response
32.	Vlad Urukov-July	Ch.0.2 s.5.6.7	Please confirm these qualifiers are used appropriately. What does it mean “to be authorized” as compared “to be a ...”	Please see the IESO’s response to ID#31.
33.	Vlad Urukov-July	MR Ch.0.2 s.5.8.6.3	<p>Confirm “transactions for energy” is not “physical transactions for energy” as elsewhere in this chapter.</p> <p>Confirm the three previous billing periods will extent into the current market (as in are not reset at MRP)</p>	<p>Section 5.8.6 relates reductions in prudential support for physical transactions. For clarity, the IESO has replaced “transactions for <i>energy</i>” with “<i>physical transactions for energy</i>” within section 5.8.6.3.</p> <p>The IESO confirms that the three previous billing periods will not reset, and that billing periods prior to MRP go-live will count as a previous energy market billing period.</p>
34.	Vlad Urukov-July	MR Ch.0.2 s.5C.1.6	“For virtual transactions” appears twice. Consider removing first instance for clarity.	The second instance of “virtual transactions” following “trading limit” was intentional and meant to differentiate from a “trading limit for physical transactions”.

ID	MP	Section	Feedback	IESO Response
35.	Vlad Urukov-July	MR Ch.0.2 s.5C.1.7	Is this to mean that the IESO will establish this amount each "billing period" (i.e., each month?)	Correct. Similar to the default protection amount for the physical transactions (section 5.3.8), the IESO is obligated to establish a default protection amount for virtual transactions for each energy market billing period. If the virtual trader does not change its maximum daily trading limit (in MWh) between billing periods, the default protection amount will be the same between billing periods.
36.	Vlad Urukov-July	MR Ch.0.2 s.5C.1.9.1	There are two terms in brackets and one reference to a single value. As there is no b. consider combining into one.	The variable " Δ DAPVT, ARTPVT" is the name for a single variable for the price delta, and should not be considered as two terms. Thank you for your comment. The IESO will review this and other similar instances in the market rules and will consider adjusting the drafting convention in general.
37.	Vlad Urukov-July	MR Ch.0.2 s.5C.1.9.2	"Interim price delta" is not used anywhere else in this chapter. What is the purpose of defining it here? a. Shadow prices are not subject to MMCP b. Can you clarify c. Assuming more recent data will be weighted more, please add language to clarify. Also explain what is the "data" referred to in c. And "or" in b.	"Interim price delta" is defined within this section in order to differentiate it from the enduring price delta in section 5C.1.9.1. The term "interim price delta" is used multiple times in Market Manual 5.4 – Prudential Support which cross-references to section 5C.1.9 of Chapter 0.2. a. For the purposes of determining the interim price delta in section 5C.1.9.2a, the shadow prices will be capped at +/- the maximum market clearing price (i.e. +/- \$2,000). Market Manual 5.4 – Prudential Support (section 4.2.1.2 Interim Price Delta for Prudential Support Obligation for Virtual Transactions) has been updated to add this detail. b. Correct - temporal weighting is the concept of applying more weight to post MRP implementation data. The subsections a to c of section 5C.1.9.2 are intended to provide some examples of what will be used to estimate the price delta until a sufficient depth of data is available. It is a non-exhaustive list, in that other data could also be used. As such, we do not believe that more specificity in section c, nor in the weightings, provide any additional value. The "data" referred to in this section is referring to the three years worth of historical data.

ID	MP	Section	Feedback	IESO Response
				As this is a non-exhaustive list, we have addressed this by including 'and' at the end of section b.
38.	Vlad Urukov-July	MR Ch.0.2 s.5C.1.10, s.5C.1.11	5C.1.11 should refer to data being published as soon as it's modified as per 5C.1.10, rather than "annually" as the modification can be more frequent.	<p>The price delta used for determining the minimum trading limit and default protection amount for virtual transactions will be published at least once annually, regardless of whether the value has changed or not. Should any reviews pursuant to section 5C.1.10 result in a modification to the price delta during the year, the IESO will publish the modified price delta. Section 5C.1.11 has been modified as suggested:</p> <p>5C.1.11 The IESO shall publish annually the price delta described in section 5C.1.9, and publish any modified price delta information resulting from a review pursuant to section 5C.1.10.</p>
39.	Vlad Urukov-July	MR Ch.0.2 s.5C.1.12.3, 5C.1.12.4, 5C.1.12.5, 5C.1.12.6	<p>1- Move the "and" from 5C.12.4 to 5C.12.5</p> <p>2- What is referred to as "the status of a virtual" trader? Consider expanding or defining the term.</p>	<p>1- The IESO has moved the "and" from 5C.1.12.4 to 5C.1.12.5 as suggested.</p> <p>2- The phrase "changes to the status of a virtual trader" mirrors the language from section 5.3.11 – "changes to the status of a market participant" for physical transactions. "Changes to the status" refers to if there have been any material changes related to a virtual trader's/market participant's prudential obligation calculation which would require a change to the calculation of maximum net exposure, as specified in the market rules. The IESO is of the view that expanding or defining the term is unnecessary, as the language has not caused any issues since market opening.</p>
40.	Vlad Urukov-July	MR Ch.0.2 s.5C.1.13	1- Extra "," after "for virtual transactions".	1 – Thank you. The IESO will integrate this suggestion in a future amendment.

ID	MP	Section	Feedback	IESO Response
			2- Consider rewording "shall apply with effect from..." with "the effective date of the ..." to align with the next sentence.	2 – The phrase "shall apply with effect from such time" mirrors the language from section 5.3.12 for physical transactions.
41.	Vlad Urukov-July	MR Ch.0.2 s.5C.2.2	Replace ";" with "." At end of section.	The ";" has been replaced with an "." as suggested.
42.	Vlad Urukov-July	MR Ch.0.2 s.5C.3.3	Shadow prices are not subject to MMCP	For the purposes of determining the price delta in section 5C.3.3 the shadow prices will be capped at +/- maximum market clearing price (i.e. +/- \$2,000). Market Manual 5.4 – Prudential Support (section 5.3 Daily Price Delta) has been updated to add this detail.
43.	Vlad Urukov-July	MR Ch.0.2 s.5C.4.1	The time is prescribed in "5C.4.2" not "5C.4.3"	The IESO has changed the cross reference in section 5C.4.1 to 5C.4.2 as suggested.
44.	Vlad Urukov-July	MR Ch.0.2 s.5C.6.1	<p>Confirm "the most recent six energy market billing periods" will include period before MRP is implemented.</p> <p>Shouldn't this section be in 5D given that it assumes that category of participants (both virtual and physical?)</p>	<p>The IESO confirms that the most recent six energy market billing periods will include billing periods prior to MRP implementation.</p> <p>The placement of 5C.6 - Reductions in Prudential Support Obligations for Virtual Transactions mirrors the placement of section 5.8 – Reductions in Prudential Support Obligations for Physical Transactions. Both reduction sections are within</p>

ID	MP	Section	Feedback	IESO Response
				their respective physical or virtual transaction sections respectively. For this reason, the IESO prefers to keep the section's location where it currently is. Moreover, restructuring the sections at this time may introduce unintended cross-referencing errors.
45.	Vlad Urukov-July	MR Ch.0.2 s.8.2.3.2	Please explain why this section was deleted.	As specified in the discussion section of MR-00453-R03 – Prudential Security and Default Levies via Batch 1 of the MRP market rule amendments, section 8.2.3 was amended to change the administrative details specified on the notice of first default levy in order to streamline the process, based on the IESO's experience of issuing notices of first default levies to date. Based on this streamlined process, s.8.2.3.2 was deleted as it is no longer required.
46.	Vlad Urukov-July	MR Ch.0.2 s.8.6.1.1	The default is presented as an "or" for real-time "or" day ahead, but the process below becomes an "and". Please confirm the equation is appropriate in terms of either delineating between or including both markets. For example what is the "net transaction dollar amount" in terms of the two markets?	For consistency, the IESO has amended the section to refer to default in the real-time market and the day-ahead market. The net transaction dollar amount is defined further down in the table in MR Ch0.2 s.8.6.1.1.
47.	Vlad Urukov-July	MR Ch.0.2 App.2.2 s.1.2.3	Insert space after "Ch.5 s.12"	The IESO has inserted a space after "Ch.5 s.12" as suggested.

ID	MP	Section	Feedback	IESO Response
48.	Vlad Urukov-July	MR Ch.0.2 App.2.3 s.3.4	Can the IESO comment on the significance of this edit, if any?	Solicitor and client basis is a legal term that refers to the manner of determining the amount of cost awards granted in a legal proceeding. As per section 1.04(5) of R.R.O. 1990, Reg. 194: Rules of Civil Procedure, 'solicitor and client' basis is interchangeable with 'substantial indemnity' basis, with the latter being the more current term.
49.	Vlad Urukov-July	MR Ch.0.3 s.2.2.1.8, 2.2.1.9, 2.2.1.10, 2.2.1.11	Remove "and" in 2.2.1.8 Replace "." With ";" in 2.2.1.9	The IESO has incorporated the suggested editorial changes.
50.	Vlad Urukov-July	MR Ch.0.3 s.2.2.3	Could the IESO confirm the language change means that IRP will be subject to Section 2, as per 2.5.1A.4H	<p>Disputes about the IRP are covered by the dispute resolution regime set out in section 2. There is no requirement that a market participant use the IRP before using the dispute resolution process.</p> <p>Section 2.2.3 carves out disputes that the dispute resolution process does not apply to. Section 2.2.3.9 says that section 2 does not apply to any disputes that have an alternative dispute resolution mechanism provided for in the market rules. Without the new language, section 2.2.3.9 would have prevented the use of the dispute resolution process for disputes related to the determination of a resource's reference levels and reference quantities.</p>

ID	MP	Section	Feedback	IESO Response
51.	Vlad Urukov-July	MR Ch.0.3 s.2.5.1A.4H	What type of notification will the IESO provide to participants when it registers reference levels/quantities following an IR	When the IESO registers a resource's reference levels/quantities, either after issuance of a preliminary view report or after concluding an independent review, the market participant's registered MPM Contact will receive a system generated email notifying them that the reference levels/quantities have been registered and communicating the effective date for the updated reference levels/quantities.
52.	Vlad Urukov-July	MR Ch.0.3 s.2.6.9, 2.6.10, 2.6.11, 2.6.16, 2.6.17	Change "him or her" in 2.6.10 to "the mediator" and "arbitrator" in 2.7.16 and 2.7.17 for consistency	The IESO has amended sections 2.6.10, 2.7.16 and 2.7.17 as suggested.
53.	Vlad Urukov-July	MR Ch.0.3 s.6.5.1, 6.5.2	6.5.1 refers to the deregistration of a "facility" and refers to "resources" as long as they are associated with a "facility". 6.5.2 and following sections refers to "facilities" OR "resources", implying a resource can be deregistered without a deregistration of a facility. Please explain if a resource can be deregistered and update 6.5.1, if so.	MR Ch. 3 s. 6.5.1 authorizes the IESO to deregister a market participant's resource or resources without also deregistering its facility or facilities. As deregistration may apply to both the facility and the resource, and not only one or the other, "and" is the appropriate conjunction for this provision.
54.	Vlad Urukov-July	MR Ch.0.3 s.6.6.6B	Change ";" to ":" after "follows" Add "; and" to 6.6.6B.1	The IESO has amended this section as suggested.

ID	MP	Section	Feedback	IESO Response
55.	Vlad Urukov-July	MR Ch.0.4 s.7.3.1.2	Explain what is the situation where a facility is not associated with any resources in this context.	There are embedded generators, embedded for instance within a distribution system or within an industrial load, who are not active in the market and do not have an obligation to register their equipment as individual resources with the IESO, which are nonetheless required by the IESO to provide certain monitoring information for reliability purposes.
56.	Vlad Urukov-July	MR Ch.0.4 Appendix 4.15	Missing italicization of a lot of terms here: "market participant", "resource" etc...	The italicization is correct in the amendment proposal.
57.	Vlad Urukov-July	MR Ch.0.4 Appendix 4.15 and 4.24	1- Use "providing" or "that provides" for consistency. 2- Confirm this is not adding incremental obligation to report at a unit level.	1- The IESO has amended App 4.24, 4b) to use "providing" as suggested. 2- In each case for generation and storage, the obligation in the legacy rules is at the unit level, so there is no meaningful change in the renewed rules.
58.	Vlad Urukov-July	MR Ch.0.4 Appendix 4.15	Remove extra ";"	The IESO has deleted the extra ";" as suggested.
59.	Vlad Urukov-July	MR Ch.0.4 Appendix 4.24	Remove "," before "providing regulation".	The IESO has removed the "," as suggested. As per Ch.1 s.7.1.1.1 words importing the singular also includes the plural.

ID	MP	Section	Feedback	IESO Response
			Should “unit” be pluralized (or add “fore each unit”) as there may be more than one unit that provides regulation for each “facility associated with a resource”	
60.	Vlad Urukov-July	MR Ch.0.5 s.3.5.1.5	Correct font in b.	Thank you – this formatting error only exists in one of the supplemental documents, and does not exist in the formal amendment proposal.
61.	Vlad Urukov-July	MR Ch.0.5 s.4.5.2A	Previous language was based on CAOR rules. The new language only speaks to implementation of voltage reductions and 30R decreased requirements – can the IESO confirm that the new approach replacing CAOR is adequately captured elsewhere in MR in terms of process.	<p>The Grid and Market Operations Integration detailed design removed control action operating reserve (CAOR) from the IESO-administered market as it was determined that CAOR was being scheduled at times that did not constitute a reserve shortfall.</p> <p>The new market rule is intended to enable the IESO to schedule voltage reductions and/or reduce 30-minute operating reserve requirements in accordance with the applicable reliability standards. The process for scheduling these control actions is expressed in MM 7.1 Appendix B: Emergency Operating State Control Actions.</p>
62.	Vlad Urukov-July	MR Ch.0.5 s.8.4.1	<p>The period of applicability is unclear. Specify how long can the compensation be applied for.</p> <p>Are 8.4.1.4 and 8.4.1.5 done at an interval resolution? If so, clarify.</p> <p>What if the compensation as defined in the last section is higher than the MWP and/or the balancing credit. Will the participant receive the delta or those intervals will not be subject to a compensation calculation altogether.</p>	<p>The duration of the compensation is determined on a case-by-case basis following the IESO’s investigation. Once the overall duration is established, the calculation proceeds at an interval level resolution.</p> <p>The IESO will consider other settlement amounts paid in determining whether Remedial Action Scheme compensation under MR Ch.0.5 s.8.4.1 is appropriate. If a resource received either the DAM MWP or the DAM Balancing Credit, then those intervals will have already been compensated and compensation under MR Ch.0.5 s.8.4.1 would be unnecessary.</p>

ID	MP	Section	Feedback	IESO Response
63.	Vlad Urukov-July	MR Ch.0.5 s.12.1.3	Correct font in a. and b.	Thank you – this formatting error only exists in one of the supplemental documents, and does not exist in the formal amendment proposal.
64.	Vlad Urukov-July	MR Ch.0.5 s.1.1.2	The net injection of withdrawal of the facility as a whole can be much different than the net injection or withdrawal at the resource level. Can the IESO confirm the appropriateness of this change	This is confirmed as correct. Regulation is scheduled and controlled at the resource level which is the required granularity for monitoring, in addition to any more specific monitoring requirements found in the appendix to chapter 0.4.
65.	Vlad Urukov-July	MR Ch.0.5 s.1.3.2	Confirm the unit of application is at the “unit” rather than the “facility” level. Also elsewhere the unit of application was “resource” rather than “unit”.	The application of resource versus unit is specific to the service being referred to and was determined based on the granularity that our control room directs the market participant. Automatic voltage regulation is indeed provided at a unit level, and depending on the context, most references to this service should be at a unit level.
66.	Vlad Urukov-July	MR Ch.0.6 s.9.3.2A	Use either “resource”, or “resource(s)” for consistency. I do not recall use of “resource(s)” in other chapters so that is likely the less preferred option.	The IESO has incorporated the change as suggested.

ID	MP	Section	Feedback	IESO Response
67.	Vlad Urukov-July	MR Ch.0.8 s.2.0.1	The language here squarely puts this on “software inadequacies” and in my understanding compels the IESO to correct these. This is a different than the explanation relating to underutilization and little value of PBCs. Please confirm the intent when it comes to PBCs	The term “software inadequacies” is intended to highlight that in relation to PBCs, the IESO’s tools have not been updated to allow for settlement in the renewed market. As indicated at the April 2024 stakeholder engagement, the IESO intends to suspend physical bilateral contracts (PBCs) effective as of the MRP go-live date. The rationale includes the significant effort and costs to implement and align changes with MRP design, and their limited use since market opening. If in the future it is determined that there is sufficient value in reintroducing an updated PBC mechanism, the existing elements of the PBC framework could be leveraged. MR Ch.0.8 s.2.0.1 is the market rules mechanism to suspend PBCs accordingly, and existing references to PBCs throughout the market rules and market manuals will be retained but inoperable. These references may be removed or repurposed in the future.
68.	Vlad Urukov-July	MR Ch.0.8 s.2.1.3.1	Remove italics for the “a” in “and”	Thank you – this typographical error only exists in one of the supplemental documents, and does not exist in the formal amendment proposal
69.	Vlad Urukov-July	MR Ch.0.8 s.2.1.3.1, 2.1.3.2	Confirm if the application is hour, interval or both and align language.	Please see IESO response to ID#67 - Given the suspension of physical bilateral contracts effective MRP go-live, this section will not be in effect.
70.	Vlad Urukov-July	MR Ch.0.8 s.3.6.1	“All settlement hours” should be time bound by some qualifier - e.g., “in an auction”, “applicable” etc..	The IESO has added “applicable”, as suggested.

ID	MP	Section	Feedback	IESO Response
71.	Vlad Urukov-July	MR Ch.0.8 s.4.10.3	I understand the removal of this language. But am curious if additional language is required to navigate through market renewal. Is the first short term auction in the new market, for example, held on May 1 to May 15 given a MRP implementation date of May 1? In other words is there a need to define the start of the new process following the “market transition date” as in 4.12.1	The IESO obtained a market rule exemption to assist in the transition of the TR market into the renewed market. It allows the IESO to cancel TR auctions that would create TRs that could span both markets. As a result of this exemption, it is expected that there will be at most a two month period during which no TRs (short or long term) are offered to the market. For the period of time where there are only short term auctions held, the TRs that would have been auctioned at the long term auction will be made available instead at the short term auctions. The TR market would ‘restart’ as per its normal schedule following the MRP completion date. Therefore, no additional language is required for the market rules.
72.	Vlad Urukov-July	MR Ch.0.8 s.3.12.1.3	With the removal of “hour flows”, there is no clarity on the unit of disclosure. Will the energy scheduled for injection or withdrawal be an hour quantity?	The term “hourly flows” was removed because the day-ahead market schedule is an hourly schedule. The IESO has added reference to ‘each <i>settlement hour</i> ’ to provide additional clarity.
73.	Vlad Urukov-July	MR Ch.0.8 s.3.13.10	See comment on applicability of “facsimile” in other sections of the market rules. Is this removal of such means of communication extending to other sections?	Facsimile was removed in Chapter 0.8 as this specific notification process will no longer include facsimiles. The section in Chapter 0.1 is broader in that it pertains to all notifications effected under the market rules, unless stated otherwise. In the event that facsimiles are still accepted in some business processes, the section of Chapter 0.1 was left as is.
74.	Vlad Urukov-July	Ch.0.8 s.3.19.2 Ch.0.9 s.3.8.2	There is some difficulty in following the cross references between Ch 7 and 9 in terms of how the TR process will take place. For example, is the “ amount of the day-ahead market net external congestion residual” in 3.8.2 parallel to the	The structure and organization of these provisions has not been updated by MRP. MR Ch. 0.8 s.3.19.2 provides that transmission rights payments are funded by the DAM congestion rent collected and where these funds are insufficient, the TR clearing account. MR Ch. 0.9 s.4.19.2 then provides that any remaining amounts of DAM congestion rents after TR payments are made should be deposited into the TR clearing account.

ID	MP	Section	Feedback	IESO Response
			process described in 4.19.2? If it is, it should be cross-referenced.	
75.	Vlad Urukov-July	MR Ch.0.9 s.2.1.4	Is the replacement of facility with resource appropriate as a facility and its relationship to RWMs is different at that level vs. the resource level. There may be multiple resources for each facility.	The IESO can confirm that resource is appropriate in this instance.
76.	Vlad Urukov-July	MR Ch.0.9 s.2.2.6	"Connection station service" is a defined term whereas "connection service" isn't. Confirm the appropriateness of the deletion of the word "station"	This was an inadvertent deletion and the IESO has corrected this.
77.	Vlad Urukov-July	MR Ch.0.9 s.2.2.12.2	I am not convinced the addition of the word "uplift" is appropriate. "Hourly uplift" is a defined, term but the word "uplift" isn't. On the IESO website, there is a distinction between uplifts and the IESO fee for example. The additional word "uplift" therefore may change and limit the AQEW settlements amount included in the reimbursement as compared to in today's market.	In order to avoid any confusion, the IESO has deleted the word "uplift" as suggested. The exact settlement amounts covered by the Generation Station Service Reimbursement Credits are as specified in Charge Types & Equations under charge type 119.

ID	MP	Section	Feedback	IESO Response
78.	Vlad Urukov-July	MR Ch.0.9 s.2.4.6, 2.4.6.1, 2.4.6.2, 2.5.2	<p>Trying to understand the use of 'm', 'c' and 's' which are referred to as "locations" in 2.4.6 and then as "registered wholesale meters" in 2.5.2.</p> <p>Similarly in 2.4.6 there is a reference to a facility "k/m", "k/c" and "k/s" whereas in 2.5.2 the reference is to a resource using a different location of the ' – 'k'/'m' ...etc.</p> <p>Are these the same or the meaning is dependent on the use?</p>	The equivalent provisions of section 2.4.6 and 2.5.2 in the current market rules are 3.1.4A and 2.4A.2, respectively. These were updated to incorporate the newly added identifiers 's' and 'c', representing steam turbines and combustion turbines. The substance of these provisions was not amended and they operate to ensure correct mapping from physical wholesale meters to the relevant metering data for individual resources.
79.	Vlad Urukov-July	MR Ch.0.9 s.2.13.1	How will the IESO determine eligibility in the context of this provision? Was there a comparable provision in the current market?	Eligibility will be determined in accordance with the provisions of the market rules relating to a market participant's entitlement to the relevant settlement amount. Market rules comparable to this one currently exist for individual settlement amounts, such as in MR Ch.0.9 s. 3.8.1 as it pertains to CMSC. With multiple settlement amounts replacing the need for CMSC payments, this broader more comprehensive provision was determined appropriate.
80.	Vlad Urukov-July	MR Ch.0.9 s.2.14.2	Confirm the IESO can indeed determine ALL of the real-time market settlement data using only real-time data.	The IESO can confirm that in those circumstances it is able to determine all real-time settlement amounts using only real-time data.
81.	Lukas Deeg	MR Ch 0.1, s.A.1.3	What provisions will be depended upon, either within the introduction or Chapter 7 s13, to allow the real time market to be rolled out, followed by the day ahead market? Will there be any dependency on the <i>legacy market rules</i> during this period? If this is the case, will	The real-time market will be rolled out followed by the day-ahead market as part of the "market transition" which is defined in MR Ch.0.11. The market transition is enabled using a type of market suspension pursuant to MR Ch.0.7 s.13.2.4.5. The market transition is further supported by MR Ch.0.7 s.13.2A Market Transition Suspensions.

ID	MP	Section	Feedback	IESO Response
			the legacy market rules be revoked as stated in this section?	<p>During the market transition, if the IESO determines that a “market transition error” has occurred in accordance with MR Ch.07 s.13.2A.6, the IESO may conduct operations on the IESO-administered markets in accordance with the “legacy market rules.” The IESO may determine a market transition error if the unlikely conditions specified under MR Ch.07 s.13.2A.7 arise.</p> <p>The legacy market rules will be revoked as stated in MR Ch 0.1 s.A.1.3 but the “renewed market rules” authorize the IESO to utilize the legacy market rules as specified in MR Ch 0.1 ss.A.1.4 – A.1.5 and MR Ch.07 s.13.2A.6.</p>
82.	Lukas Deeg	MR Ch 0.1, s.A.1.4.3	<p>Consider adding “; or” after “violation”.</p> <p>Note: May apply to other chapters in the market rules.</p>	The IESO has updated A.1.4.3 in Chapter 0.1. The update has been applied throughout the Final Alignment documents, as applicable.
83.	Lukas Deeg	MR Ch 0.1, s.A.1.4.4	<p>Consider changing:</p> <p>“...remedy in respect of”</p> <p>to</p> <p>“...remedy in respect of:”</p>	The IESO has updated A.1.4.4 in Chapter 0.1. The update has been applied throughout the Final Alignment documents.
84.	Lukas Deeg	MR Ch 0.1, s.A.1.4.4 subsection (a)	<p>Consider changing:</p> <p>“...subsection A.1.4.2, or”</p> <p>to</p> <p>“...subsection A.1.4.2; or”</p>	The IESO has updated A.1.4.2 in Chapter 0.1. The update has been applied throughout the Final Alignment documents.

ID	MP	Section	Feedback	IESO Response
85.	Lukas Deeg	MR Ch 0.2, Appendix 2.2 s.1.2.2	Consider changing: <p>“...MR Ch.5 s.12the”</p> <p>to</p> <p>“...MR Ch.5 s.12 the”</p>	The change has been applied throughout Appendix 2.2 section 1.2.
86.	Lukas Deeg	MR Ch 0.2, Appendix 2.2 s.1.2.7	Consider changing: <p>“...MR Ch.5 s.12the”</p> <p>to</p> <p>“...MR Ch.5 s.12 the”</p>	The change has been applied throughout Appendix 2.2 section 1.2.
87.	Lukas Deeg	MR Ch 0.3, s.2.5.1A.5	Changes to the provisional redline does not match the clean version. The “; and” at the end of the sentence is included in the redline but not the clean version. <p>Can the IESO confirm other differences in the redline against the clean versions posted.</p>	The changes to the provisional redline version are incorrect due to a typographical error, the “; and” should be shown as deleted and replaced with a “.” <p>MR-00481-R03 (clean version) is shown correctly and is aligned with the changes to baseline version of Chapter 3.</p> <p>The IESO confirms that the version of the amendment requiring IESO Board approval, MR-00481-R03, is correct.</p>
88.	Lukas Deeg	MR Ch 0.7, s.1.3.1	Consider not having “reliability” in “reliability agreements” italicized as “reliability agreements” has a different meaning when read together.	MRP has not amended the italics for “ <i>reliability</i> ” within “ <i>reliability</i> agreements” and will maintain the current format.

ID	MP	Section	Feedback	IESO Response
89.	Lukas Deeg	MR Ch 0.7, s.13.6.3	<p>I would like to better understand how each of the administrative pricing alternatives described in 12.6.3.1 through 12.6.3.4 would potentially apply to the scenarios described in 13.2A, and how the IESO will determine which approach is appropriate considering the circumstance.</p> <p>Is it possible to add a provision to clarify that, where reasonably practical, the <i>administrative price</i> or approach used to calculate the <i>administrative price</i> will be determined and communicated to <i>market participants</i> in advance of the <i>dispatch interval</i>?</p>	<p>Following the market transition the IESO will utilize one or a combination of the administrative pricing methodologies described in section 13.6.3 as appropriate based upon the best available data following the market transition. The IESO will administer the remaining intervals on April 30, 2025 following the commencement of the market transition by copying forward the most recent valid legacy market price pursuant to section 13.6.3.1. From May 1, 2025 onwards, where price administration is necessary, the IESO's preferred methodology is to copy backward the first subsequent valid real-time locational marginal price pursuant to section 13.6.3.2.</p> <p>Consistent with today's approach, the IESO will not notify market participants which method of price administration was applied. Market participants may contact the IESO's Customer Relations with any questions pertaining to the methodology applied to administer prices.</p>
90.	Lukas Deeg	MR Ch 0.7, s.13.7.2	Please clarify what type of information may be required by market participants, and how the information will be protected considering other provisions within the market rules (e.g., confidential information).	<p>This market rule has not changed as part of MRP and the information requested by the IESO will depend on the circumstances that led to the market suspension and the relevant details the IESO will require to conduct its review of the events.</p> <p>Information submitted to the IESO, determined or identified to be confidential information (as defined in Chapter 0.11), will continue to be protected by the confidentiality provisions of the market rules pursuant to MR Ch.0.3 s.5.</p>
91.	Lukas Deeg	MR Ch 0.7, s.22.5 and 22.6	Consider adding a provision that clarifies that the IESO will grant in a timely manner any reasonable request made by the market participant to change reference levels or reference quantities.	The IESO will continue reference level consultations after February 2025 once market participants have had the opportunity to review the preliminary view reports issued for their resources. Market participants will have the ability to initiate requests for changes through the new Online IESO workflow at that time. The turnaround time for a reference level or reference quantity changes depends on the nature and complexity of the request and complexity. For example, if an O&M cost has changed and the required supporting documents are provided, the change could likely be implemented within a few days. For a complex request where a market participant updates a resource registration parameter that impacts the resource's

ID	MP	Section	Feedback	IESO Response
				reference level, duration would be expected to be consistent with the timelines for the Register Equipment process, including a commission phase (if required). The IESO will work in parallel with market participants to update reference levels before the end of the commissioning period.
92.	Lukas Deeg	MR Ch 0.8, s.2.0.1	<p>Is there a determined timeframe that the relevant software inadequacies will be resolved?</p> <p>Consider removing physical bilateral references from all market rules if the software inadequacies are expected to be in effect for an extended period of time.</p>	Please see the IESO's response to ID#67.
93.	Lukas Deeg	MR Ch 0.11, Energy Definition	Definition italicized within itself. Does real energy and reactive energy need to be defined?	The IESO has not amended the definition of energy as part of MRP and the proposal to define real energy and reactive energy will not be considered as part of the project.
94.	Lukas Deeg	MR Ch 0.11, Pseudo Unit Definition	Should the pseudo-unit definition be referencing only one combustion turbine generation resource? Consider having the definition reference, "...one or more combustion turbine generation resource..." to better match the combined cycle definition.	A pseudo-unit can only be associated with a single combustion turbine. There could be multiple pseudo-units in a combined cycle plant. The definition is correct as it is stated that there can only be one combustion turbine.
95.	Lukas Deeg	MM 1.5, s.3.3.4.1	I have general concerns of this proposed amendment. The change could effectively result in a less optimized dispatch of dependent units and effectively result in a less efficient dispatch schedule.	<p>The addition to MM1.5 s.3.3.4.1 was made to clarify the original design intent of from the Enhanced Day-Ahead Commitment project that pseudo-units would only be connected at a single connection point to avoid introducing reliability risks associated with introducing discrepancies between the way in which the IESO's tools model the pseudo-units and the way in which the units are physically connected in reality.</p> <p>On further review, it was determined that requests from resources not connected at the same connection point to become a pseudo-unit could be considered on a case-</p>

ID	MP	Section	Feedback	IESO Response
			<p>I would like to better understand:</p> <ol style="list-style-type: none"> 1. why this change is necessary; 2. why this change is being proposed as part of the final alignment batch (as opposed to being included in previously proposed batches); 3. if this change will apply to existing generators and if they were consulted prior to making the change; and 4. how are these generators expected to manage their dependent resources if they cannot be designated as a pseudo unit. <p>One market participant has expressed concern and believes this change will negatively impact their operation.</p>	by-case basis following an assessment of potential reliability impacts. The IESO has revised MM1.5 accordingly.
96.	Lukas Deeg (Part 2 of 2)	MR Ch 0.2, s.5.1.2	Please confirm why periodic reviews of the prudential support requirements have been removed.	The periodic reviews of the prudential support requirements were removed, since successive reviews in 2016, 2019 and 2022 did not result in any material changes. Going forward, stakeholdering of any aspects of the prudential regime will occur when determined necessary by the IESO and/or stakeholders.
97.	Lukas Deeg (Part 2 of 2)	MM 5.4, s.1.1	<p>Several changes for consideration to improve clarity:</p> <ul style="list-style-type: none"> • Remove the extra space between “governing” and “the”; • Correct “performeand” or fully remove the bullet; 	Agreed, the corrections have been made.

ID	MP	Section	Feedback	IESO Response
			<ul style="list-style-type: none"> Sentence "...market rules, market rules shall prevail" is incomplete and should be its own sentence (not made as a bullet). 	
98.	Lukas Deeg (Part 2 of 2)	MM 14.1, s.2.2.1	Is this intended to say "...is not available for the IESO-determined study period..."?	Yes. The IESO will update the Market Manual to reflect this suggested change.
99.	Lukas Deeg (Part 2 of 2)	MM 14.1, s.2.2.2	Why will the IESO exclude non dispatchable generation and dispatchable load from the report? Noting non dispatchable generation and dispatchable load remains published for DCAs.	The inclusion of non-dispatchable generation and dispatchable load in the DCA report was a drafting oversight. The IESO will update the Market Manual to reflect that the DCA report should not include non-dispatchable generation and dispatchable load resources.
100.	Lukas Deeg (Part 2 of 2)	MM 14.2, s.3.2	<p>Consider adding, "or".</p> <p>As it relates to the third point, could you provide an example on how the IESO will determine if the cost is reasonable for the resource?</p>	The third bullet refers to "screen captures" of previously registered reference levels. This flexibility was added to reduce administrative burden on MPs to resubmit a complete workbook when only single reference level is changing. Acceptable screen captures will include the new Online IESO workflow that "MPM Contact" will have access to, or it could be from latest version of the preliminary view report. Nonetheless, the example of MGBRT is only provided as explanation. There is no cost assessment performed for the MGBRT reference level as it is operational in nature.
101.	Lukas Deeg (Part 2 of 2)	MM 14.2, s.3.2	<p>Consider changing:</p> <p><i>"does not support costs that are eligible for inclusion in the reference level that the documentation has been submitted to support,"</i></p> <p>For the third bullet – Please confirm the IESO will work in good faith with the market participant to address any</p>	<p>The IESO will update the Market Manual to reflect this suggested change.</p> <p>The IESO will work in good faith with the market participant when a request is submitted to address any information that is missing or unclear.</p>

ID	MP	Section	Feedback	IESO Response
			potential perceived incomplete, vague, or unclear information that is submitted.	
102.	Atura Power	MM 1.5, s.3.3.4.1	<p>Atura is concerned with the addition in Section 3.3.4.1 - "The IESO will not approve a pseudo-unit registration request unless all resources designated as part of the pseudo-unit are connected to the IESO-controlled grid at the same connection point."</p> <p>C. Introducing rules and manuals preventing certain combined cycle plants from registering as pseudo units under MRP is unfair and discriminatory and is inconsistent with the IESO Market Renewal principles on competition. Market Rules and Manuals should be introduced or amended such that all combined cycle plants (that are disaggregated) are given the same opportunity to realize the benefits provided by PSU modeling when navigating the renewed market and thus avoid the impact or disadvantages created for unequal treatment as outlined in section B above.</p>	Please see the IESO's response to ID#95.
103.	Power Advisory	Market Power Mitigation Framework	The Consortium recommends that IESO work directly with market participants (MPs) and other stakeholders (e.g., TP members, etc.) to successfully agree to a fair and workable framework that will permit MPs, who have been subject to IESO's application of MPM, and IESO to review IESO's application of MPM for a pre-determined time post MRP go-live. Based on this review, if the IESO's application of MPM resulted in unfair results (i.e., relating to operations of MPs' facilities within the IESO-Administered Markets (IAM), associated IAM revenues,	The IESO held multiple sessions with the Technical Panel to discuss energy suppliers' concerns with the new market power mitigation framework (MPM) being introduced through MRP. The IESO understands energy suppliers' concerns as follows: if significant issues occur with the new MPM framework it may be difficult to understand the root causes and/or the IESO may not be prepared to address issues in a timely way. The IESO has proposed actions that can be taken to help identify potential unintended consequences of the MPM implementation and to mitigate the risk of material, unintended impact on suppliers.

ID	MP	Section	Feedback	IESO Response
			<p>etc.), MPs should be afforded appropriate indemnification from IESO (e.g., payments for lost revenues, other forms of compensation and reparation, etc.).</p> <p>The form of such fair and workable framework between MPs and IESO must be discussed (e.g., new MRP-related amendments to the Market Rules and/or separate agreements (e.g., contract amendment agreements), etc.) This framework needs to be concluded prior to TP voting on final approval of all MRP-related amendments to the Market Rules (note – Presently scheduled for September 10, 2024 TP meeting).</p>	<p>In addition to market participants’ ability to leverage the existing recourse options discussed at the August 15th Panel meeting, the IESO has committed to taking the following actions:</p> <ol style="list-style-type: none"> 1- Delaying the designation of constrained areas; 2- Enhancing end-to-end testing; 3- Applying IESO discretion to not issue ex-post mitigation assessments if warranted; and 4- Establishing a Market Power Mitigation Working Group. <p>Proposed market rules language describing the IESO’s obligation to establish an MPM working group has been added to the section A transitional provisions of Chapter 0.7. Proposed market rules language to delay the designation of constrained areas has been added to Section B of Chapter 0.7.</p>
104.	APPrO	Market Power Mitigation Framework	<p>APPrO members have indicated that the new rules associated with MPM represent a significant change from the status quo. That, in and of itself, is not the problem. The key problem manifests itself in the inability to adequately test these new rules before the system “goes live”. Typically, rules can be tested in some form of “sandbox” in advance of full system cutover to confirm that the solutions reached by the rules are reasonable. APPrO understands that this is not the case here. Due to the complexities of the newly proposed mitigations, it is not possible to compare the potential market outcomes under scenarios with and without mitigation. For this reason, problems with the market power mitigation market rules will only be discoverable well after the fact – after a material period of time, which may allow for</p>	<p>Please see the IESO’s response to ID#103.</p>

ID	MP	Section	Feedback	IESO Response
			<p>numerous unreasonable market outcomes, and inappropriate settlement results.</p> <p>This is a major source of risk for all market participants (and the IESO itself) – one that cannot remain unmitigated.</p> <p>APPrO requests the following action from the IESO in this matter:</p> <ul style="list-style-type: none">• The IESO needs to acknowledge these market participant concerns. For clarity, this includes the inability to adequately test market rules associated with both market power mitigation as well as the resulting market settlements under market renewal.• The IESO needs to undertake work with the Technical Panel and Stakeholders to establish a process by which market participants can seek timely recourse in a situation where they feel that the MPM rules have resulted in an inappropriate outcome. This process can exist on a provisional basis until the MPM framework is appropriately validated.• The above-referenced process needs to be enshrined within the Ontario Market Rules and needs to be completed before the market power mitigation rules themselves are approved.	

ID	MP	Section	Feedback	IESO Response
			APPrO understands that there are a number of other issues that exist with respect to MPM rules, including but not limited to, conduct and impact tests, reference levels (including the independent review process), hydro-specific issues and pseudo-unit issues. APPrO assumes that the normal TP process can and will be used to address these and other issues, going forward.	
105.	OPG	MR Ch.0.3 Introduction	How does the IESO intend to treat a non-compliance issue that occurs in the “legacy market rules” and continues through the “market transition” and into the “renewed market rules”?	<p>Section A introduced in each chapter of the “renewed market rules” authorizes the IESO to commence, continue or enforce any investigation, proceeding or remedy for any breach, non-compliance, offense or violation committed or relating to the market rules or market manuals in effect prior to the market transition. The IESO will be authorized to take such compliance actions that relate to the “legacy market rules” as if the legacy market rules had not been revoked.</p> <p>Excluding non-compliance related to registration and establishing MPM reference level values, non-compliance issues that begin prior to the market transition and continue until after the market transition commences will be subject to the compliance regime under the legacy market rules for alleged breaches that occur prior to the market transition and under the renewed market rules for alleged breaches that occur following the commencement of the market transition. The renewed market rules will govern any alleged non-compliance related to registration and establishing MPM reference level values, regardless of when the alleged breaches occur.</p>
106.	OPG	MR Ch.0.7 s.3.5.23	The current wording of the section does not provide a clear assurance that a linked resource with SEAL conditions from DAM to PD will guarantee RT dispatches that fully align with the dispatch data submitted by the MP to prevent the SEAL condition. This is a matter of concern for OPG, and we suggest that the IESO consider	The submission of linked forebay, time lags, and MWh ratios specified in MR Ch.0.7 s.3.5.23 may only be submitted if the resource reasonably expects such a submission is necessary to prevent the SEAL condition. This submission allows the day-ahead market and pre-dispatch calculation engines to reflect the operational requirements of the linked forebays.

ID	MP	Section	Feedback	IESO Response
			rephrasing the language to include an additional clause such as, "Ensuring that financial and advisory schedules produced respect the daily dispatch parameters, ensuring resources are not planned to operate in a manner that would violate SEAL."	As described in MM 0.4.3 s3.3.1, the submission of linked forebay, time lags, and MWh ratios are not carried over to the real-time scheduling process. A market participant that is seeking to ensure that its dispatch schedules reflect the submission of those daily dispatch data parameters should revise the relevant hourly dispatch data parameters to drive real-time alignment with the outputs of the day-ahead market and pre-dispatch calculation engines. A market participant may request a SEAL constraint on their resource if necessary to ensure the resource is not dispatched in a manner that would endanger the safety of any person, damage equipment, or violate any applicable law.
107.	OPG	MR Ch.0.7 s.3.5.33.2.a	Could the IESO please provide clarification on the conflicting conditions presented in this section and subsection 22.3.3.8? OPG recommends updating subsection 3.5.33.2.a to reflect a duration of 24 hours instead of the current 12 hours as indicated."	The detailed design indicated that the ramp hours to minimum loading point should be no greater than 24, however in implementation it was not practical for ramp hours to minimum loading point to be any greater than 12, as communicated in a stakeholder update in June 2021. Section 22.3.3.8 will be amended to 12 to be consistent with this.
108.	OPG	MR Ch.0.7 s.20.3.1	Could the IESO kindly provide clarification regarding the change in status of the term 'adequacy' from being a defined term to an undefined term? If this change was intentional, could you please explain how the 'adequacy shortfall' is quantified in this section and provide clarification within the text itself?	The defined term adequacy pertains only to the IESO controlled-grid. In the context of section 20.3.1 the term adequacy is used in reference to a system outside of Ontario, so it should not refer to the defined term.
109.	OPG	MR Ch.0.7 s.22 (various sub-sections)	Please provide reference to Market Manual that is referred to by "applicable Market Manual" in subsections.	Please refer to the original market rule amendment proposals which received provisional IESO Board approval – link: MR-00455-R00 . The discussion section references the market rule sections in section 22 which reference the "applicable market manual" and provides the reference to the specific market manual.

ID	MP	Section	Feedback	IESO Response
110.	OPG	MR Ch.0.7 s.22.3.3	Correct section ss.22.3.1 that is showing to be a subsection to ss.22.3.3	The IESO has reviewed s.22.3.1 and does not see any issues with the set up of the rule, nor does it see any cross-referencing issues.
111.	OPG	MR Ch.0.7 s.22.3.3.4	Similar to other subsections, it is recommended that the IESO refer to a defined term to justify "maximum installed capacity" as it could be ambiguous. For instance, if a Reference Level modifier is requested, please clarify as to how the MLP would change? Further, should not this section follow the language used in other sections such as ss.22.6.7.2.	<p>This section has been amended to refer to the registered parameters specific to generation resources and dispatchable load resources.</p> <p>This section permits the IESO to set a default reference level value for a resource's minimum loading point in the absence of acceptable supporting documentation such that Market Information Management (MIM) validations do not fail due to the minimum loading point reference level. The IESO expects to work with market participants to determine appropriate reference levels for non-quick-start resources.</p>
112.	OPG	MR Ch.0.7 s.22.5.2	<p>Could the IESO please provide clarification regarding the interaction between this section and subsection 22.5.1? In subsection 22.5.1, it states that the IESO shall not change the "reference level" unless certain conditions are met. However, subsection 22.5.2 gives the IESO the option to review and make changes at any time. Can you please clarify how these two subsections should be understood together?</p> <p>Could the IESO also please confirm that the reference level updated through the review allowed by subsection 22.5.2 will only be applied going forward and will not have any retroactive effects?</p>	<p>Section 22.5.1.2 permits the IESO to change a reference level if it has identified a need pursuant to section 22.5.2. Section 22.5.2 permits the IESO to review a resource's registered information or the supporting documentation submitted to verify that the resource's reference levels are consistent with the registered information or supporting documentation.</p> <p>Reference level determinations are always applied on a go-forward basis and are not applied retroactively.</p>
113.	OPG	MR Ch.0.7 s.22.5.10.3	Can the IESO provide clarification on the basis on determining the time period of 20 business days?	The IESO anticipates that there will be occasions when large volumes of temporary reference level change requests would be submitted by market participants. All such requests will automatically be conditionally approved by the system, and recalculated reference level values will be published in MP-confidential reports and made available to the calculation engines. These requests have potential to increase reference level values significantly. The IESO will have authority to review

ID	MP	Section	Feedback	IESO Response
				these requests after-the-fact. Since IESO staff will only be available to review requests during normal business hours on business days, 20 business days is used to approximate a one-month period. After this period has passed without further rejections, participant will be eligible to receive automatic approvals.
114.	OPG	MR Ch.0.7 s.22.8.13	Based on the section, it is clear that an agreement between the IESO and the market participant is necessary to discontinue the determination process. On the other hand, could the IESO please provide clarification on the available process options in case a disagreement arises between the IESO and the market participant regarding the termination of the process?	Section 22.8.13 permits the IESO and a market participant to agree to discontinue an independent review and have the IESO register the reference levels or reference quantities that the market participant originally requested. Market participants can request use of the independent review process when they disagree with a determination in the IESO's preliminary view; this section allows the IESO to agree to register the reference levels or reference quantities that the market participant originally requested and terminate the independent review process if the market participant agrees to do so. If the market participant does not agree to do so, the independent review process continues.
115.	OPG	MR Ch.0.7 s.22.13.1.1 1.2	Can you verify if the "or" at the end of the subsection is intended to relate to ss.22.13.1.12?	Yes, the "or" at the end of subsection 22.13.1.11.2 relates to subsection 22.13.1.12.
116.	OPG	MR Ch.0.7 ss.22.5.9, 22.5.10.2 and 22.5.11	OPG previously recommended the IESO include references to section(s) of Ch.9 which the IESO has responded would be included but has not been revised.	The IESO has amended these sections to include references to the relevant provisions of Ch. 0.9, ss. 5.2.1 and 5.3.1.
117.	OPG	MR Ch.0.9 s. 2.7	OPG recommends clarifying that this section will no longer be applicable after the implementation of the Market Renewal Program (MRP) and suggests including a reference to MR Ch.8 S2.0 for further clarification	Section 2.0.1 of Chapter 0.8 includes the "relevant provisions of MR. Ch.9 applicable to physical bilateral contracts...". The IESO does not believe any further references are required.
118.	OPG	MR Ch.0.9 s. 3.4	Which IESO report will have information on whether number of starts is binding for DAM-MWP? Number of starts is required for MWP calculation. Please clarify the	The settlement statement will include two attributes (start event ID and Max start flag) that provide the necessary information on the DAM MWP when the number of

ID	MP	Section	Feedback	IESO Response
			information is in which IESO report and/or in the statement data file.	starts is binding. More information is available in table 2-6 of the Format Specifications for Settlement Statement files and data files.
119.	OPG	MR Ch.0.9 s.3.4.4.4	Could the IESO please indicate which report will provide information on whether the HMR is binding for a particular hour? It is noted that the Dispatch Data Report for the Day-Ahead (DA) Scheduling Process includes the HMR, but it does not specify whether it is binding. The binding status of the HMR is necessary for MWP calculation. Could you please clarify whether this information is included in an IESO report or in the statement data file?"	The Market Participant will need to compare their submitted MW offers in their Dispatch Data Report for the DAM Scheduling process with their Day Ahead schedule report and compare the MWs they submitted in their offers with the HMR in the day ahead dispatch data report. If the schedule is what they have submitted as an HMR, then it would be binding.
120.	OPG	MR Ch.0.9 s.3.5.2 g.	Please clarify how an MP can identify if a variable generation resource is subject to a release notification? Which IESO report will provide this information? This information is crucial in determining the eligibility of a resource for RT-MWP. Could you please clarify whether this information will be available in an IESO report and/or in the statement data file?	A Market Participant can review their Real-Time energy dispatch report; code "AUTO" or "VGRN" indicates that the resource is subject to a release notification. A "VGMD" or "SEAL" code will indicate that the resource is subject to constraints or some other limitation. See MM0.4.3 Appendix B for a complete listing of these codes.
121.	OPG	MR Ch.0.9 s.3.5.3	To ascertain whether the RT Schedule results from a reliability constraint, could you please confirm if the Settlements information is based on the Pre-dispatch Commitments Report, specifically by examining for 'Type' field=PDRCMT? This information is crucial in determining the ineligibility of RT-MWP. Could you please clarify whether this information will be available in an IESO report and/or in the statement data file?"	All resources with reliability constraints will be seen in the Market Participant's PD and RT energy dispatch reports. The MWP calculations are based on any reliability constraints outlined in these reports, as indicated by the REL code (see MM0.4.3 App B for a complete listing of these codes). For GOG-eligible resources, the PD commitments report will also show any constraints, including reliability constraints, i.e. DARCMT or PDRCMT. This information is also used for settlements.
122.	OPG	MR Ch.0.9 s.3.5.4.1 c.	Which IESO report would have information if a resource had a HMR binding constraint? This information is important to determine RT-MWP ineligibility. Please	The RT Energy Dispatch report will contain information on HMR binding constraints. The code will be HMR if it is a binding constraint.

ID	MP	Section	Feedback	IESO Response
			<p>clarify the information is in which IESO report and/or in the statement data file.</p> <p>Could the IESO please specify which report would contain information regarding whether a resource has a binding constraint for HMR? This information is crucial in determining the eligibility of a resource for RT-MWP. Could you also clarify whether this information will be available in an IESO report and/or in the statement data file?"</p>	
123.	OPG	MR Ch.0.9 s.4.5.1.1 c.	<p>Could the IESO please provide information on which report will contain the RT Commitment period for a GOG eligible resource? Is it based on the Pre-dispatch Commitment Report? This information is crucial for RT-GOG calculations. Could you please clarify whether this information will be available in an IESO report and/or in the statement data file?"</p>	<p>RT Commitments are identified by the code PD-CMT type in the Pre-Dispatch Commitments Report. In addition, extensions of Generator Offer Guarantee (GOG) eligible Non-Quick Start (NQS) resource commitment is available in the Pre-dispatch Intertie Transaction Schedule and GOG Eligible Extensions Report. See Appendix B of MM0.4.3 for a complete listing of the codes used for commitments and constraints.</p>
124.	OPG	MR Ch.0.9 s. 4.5.1.1 d.	<p>Which IESO report will have the RT Reliability Commitment period for GOG eligible resource, is it based on the pre-dispatch commitment report? This information is important for RT-GOG calculations. Please clarify the information is in which IESO report and/or in the statement data file.</p> <p>Could the IESO please clarify which report will contain the RT Reliability Commitment period for a GOG eligible resource? Is it based on the Pre-dispatch Commitment Report? This information is crucial for RT-GOG calculations. Could you please clarify whether this</p>	<p>Reliability commitments for GOG eligible resources are identified with the PDRCMT code in the Pre-Dispatch Commitments report. See Appendix B of MM0.4.3 for a complete listing of the codes used for commitments and constraints.</p>

ID	MP	Section	Feedback	IESO Response
			information will be available in an IESO report and/or in the statement data file?"	
125.	OPG	MR Ch.0.9 s.4.8.8	Could you please clarify if there is any information missing regarding the calculation for the RT NISL Residual Uplift, similar to what was provided for DA NISL Residual Uplift in ss.4.8.7?	The RT NISL residual is uplifted as part of the hourly uplift described in section 3.11.1. In contrast, the DAM NISL residual is uplifted is a daily uplift in accordance with section 4.8.7. The IESO confirms that there is no information missing regarding the calculation of the uplift for the RT NISL Residual.
126.	OPG	MR Ch.0.9 s.4.10.5	<p>When it comes to the Generator Failure Charge CT1920 and the requirement of a 4-hour notification, OPG understands that currently the IESO settlement statement data file includes the submission time (Request Time) for this charge.</p> <p>OPG would like to confirm if there are any additional confidential reports or flags aside from the Data File that the IESO may have in order to track the withdrawal time or indicate that the withdrawal occurred within the 4-hour window?"</p>	The request time for withdrawal request is determined based on the timestamp on the offer when the request was approved by the IESO. This information is available in the Dispatch Data Report for Real Time Scheduling Process for Resources.
127.	OPG	MR Ch.0.9 s.4.11.3	Section states that the FCC is to be paid on the MP settlement statement for the last trading day of the billing period, suggesting a monthly resolution. However, in the CT & Equations document, the settlement resolution for CT1138 is mentioned as hourly, which appears to be conflicting. Could the IESO please provide clarification on this discrepancy?	This discrepancy is due to the delayed nature of the determination of this settlement amount. Entitlement and determination occurs through a process that can carry over into a following month. Accordingly, while it will be calculated on an hourly basis for events during which the market participant is determined to be entitled to the FCC, such determination will not be made in time for that trade days' PSS and will instead be included on the settlement statement for the last day of the trading month. Specifically, the last trade day of the month in which such determination was made.

ID	MP	Section	Feedback	IESO Response
128.	OPG	MR Ch.0.9 s.3.4.13.4	It is noted that this section makes a reference to ss.3.4.2.3, but this sub-section seems to be missing. Could the IESO please confirm if this is an error or if there is another place where this information is located?"	The IESO has corrected this cross-reference, which should be to MR Ch.0.9 s.3.4.4.4.
129.	OPG	MM 0.1.5, s.1.4	The Contact Information section is currently missing a section number. Additionally, it should include or reference MM 14 s.1.4's second paragraph, as it is a component to the authorization and registration process to identify a Market Power Mitigation Contact.	The IESO will add the missing section number. No cross-reference to Market Manual 0.14.1 is required in section 1.4 of Market Manual 0.1.5. The cross-reference in Market Manual 0.14.1 to Market Manual 0.1.5 indicates which registered contact will receive communications regarding activities identified in Market Manual 0.14.1. The procedures for registering those contacts are set out in Market Manual 0.1.5. The reverse does not apply.
130.	OPG	MM 0.4.2, s.6.3: Example	Please correct "07:00 ESPT" to "07:00 EST"	The IESO has corrected this typographical error.
131.	OPG	MM 0.4.2, s.8.2	Could the IESO kindly provide further clarification on the need for the RMP to revise their dispatch data in cases where the IESO cancels a day-ahead operation commitment? The current paragraph appears to place the responsibility of revising dispatch data solely on the RMP without clearly specifying the data that needs to be revised. As the decision to cancel the commitment was made by the IESO for the purpose of maintaining reliability, could you please clarify what specific dispatch data would need to be revised by the RMP? OPG disagrees to the section as it stands because the RMP should not be required to change their dispatch data.	In the event that the IESO cancels a day-ahead operational commitment or pre-dispatch operational commitment as necessary to maintain reliability, the affected market participant would reasonably expect that the quantity of their physical service previously scheduled for that resource would differ from the quantity that their resource will deliver in the dispatch hours. As such, the market participant would be expected to submit revised dispatch data to the IESO to reflect the quantity they expect their resource to deliver as soon as practical per Chapter 0.7 s3.3.8. This is similar to existing requirements.
132.	OPG	MM 0.4.3, s.2.5.1.5	The language in ss.2.5.2 (Duration of advanced pre-dispatch operational commitment) states that an advanced pre-dispatch operational commitment will not exceed a resource's MGBRT. However, as stated in this section, the	There is no contradiction between these two sections. Advanced pre-dispatch operational commitments will not exceed a resource's MGBRT. The application of a reliability constraint referred to would bridge two operational commitments to

ID	MP	Section	Feedback	IESO Response
			<p>PD calculation engine's look-ahead assessment may result in an extended pre-dispatch operational commitment through the application of a reliability constraint. This is done to ensure a resource's MGBDT(hot) parameter is satisfied prior to the next day's commitment.</p> <p>OPG kindly requests that the IESO provide clarification on the contradiction between the language used in these two sections."</p>	<p>respect the resource's MGBDT. As described in s.2.5.1.5 this may be necessary when the pre-dispatch calculation engine look-ahead period only contains the current dispatch day, and does not consider any commitments produced for the next dispatch day.</p>
133.	OPG	MM 0.4.3, s.5.10	<p>Could the IESO kindly provide further clarification on the need for the RMP to revise their dispatch data in cases where the IESO cancels a day-ahead operation commitment? The current paragraph appears to place the responsibility of revising dispatch data solely on the RMP without clearly specifying the data that needs to be revised. As the decision to cancel the commitment was made by the IESO for the purpose of maintaining reliability, could you please clarify what specific dispatch data would need to be revised by the RMP? OPG disagrees to the section as it stands because the RMP should not be required to change their dispatch data.</p>	<p>In the event that the IESO cancels a day-ahead operational commitment or pre-dispatch operational commitment as necessary to maintain reliability, the affected market participant would reasonably expect that the quantity of their physical service previously scheduled for that resource would differ from the quantity that their resource will deliver in the dispatch hours. As such, the market participant would be expected to submit revised dispatch data to the IESO to reflect the quantity they expect their resource to deliver as soon as practical per Chapter 0.7 s3.3.8. This is similar to existing requirements.</p>
134.	OPG	MM 0.5.6 Table 4-1	<p>CT145 is listed as an MP line item. However, in the Format Specifications for Settlement Statement and Data Files, CT145 is also listed as a DP line item. Does this indicate that there will be certain components related to CT145 will be treated as MP for settlement purposes, similar to the current arrangement?</p>	<p>While the IESO will automatically compute CT 145, certain components for CT 145 remains as manual line items and will be treated as MP line items.</p>
135.	OPG	MM 0.5.7 General	<p>Will the settlement statement data file include the Economic Operating Point?</p>	<p>The IESO confirms that the EOP will be included in the Settlement data files.</p>

ID	MP	Section	Feedback	IESO Response
136.	OPG	MM 0.5.7 General	Will the EOP only be published for resources that are eligible for MWP, or will the EOP be published for every resource regardless of their eligibility for MWP?"	The IESO confirms that the EOP will be published for all resource regardless of their eligibility.
137.	OPG	MM 0.5.7 s.2	<p>1. Link to IESO Settlement Schedule and Payments Calendar (SSPC) should be updated to most recent on parent page. See link: https://www.ieso.ca/Sector-Participants/Calendars/Market-Calendars.</p> <p>2. Link to the "Format Specifications for Settlement Statement Files and Data Files" is to Issue 59.0. Consider updating to link to Issue 59.1-MRP? This link appears in Table 2-1, Table 3-1, and other areas.</p> <p>3. Link to "IESO Charge Types and Equations" is to Issue 85.0. MRP Final Alignment Version is Issue 82.3. Please update link.</p>	<p>1. Agreed. The link will be updated to a page that will not change each year. It will be updated when the manuals are published as part of the baseline process.</p> <p>2. Agreed. The links will be updated to the correct most recent versions when the manuals are published as part of the baseline process.</p> <p>3. Agreed. The links will be updated to the correct most recent versions when the manuals are published as part of the baseline process.</p>
138.	OPG	MM 0.5.8 s.4	Update link in Appendix A of The Market Participant Invoice Report Format referencing http://www.theimo.com/ .	This technical interface document has not been revised under MRP. The update however has been flagged for the next time it is amended.
139.	OPG	MM 0.5.10. s.3	Could the IESO provide further clarification on the physical market deadline, specifically the reference to MR Ch.9 B.1.2, which states a deadline of 6 business days after the statement is issued.	The physical market deadline for the submission of the notice of disagreement is as set out in the market rules, including MR Ch. 0.9 B.1.2. To the extent of any conflict between the market rules and the market manual, the market rules prevail. Market Manual 0.5.10 does outline the normal deadlines for the submission of notices of disagreement, and it was decided to not reiterate the exception again for the purposes of avoiding repetition.
140.	OPG	MM 0.7.1 s.7.3	Can the IESO provide process clarification on the constraint type applied to the GOG-eligible resource in day-ahead to exercise an NQS's unit readiness?	For the Unit Readiness Program, in the day-ahead timeframe, GOG-eligible resources will have a constraint, with a code of "DARCMT", applied to generate at least to their MLP for the duration of at least their MGBRT.

ID	MP	Section	Feedback	IESO Response
141.	OPG	General	<p>OPG appreciates the IESO’s engagement with stakeholders to-date on the Market Power Mitigation (MPM) framework. As this will be a new and critical component of the renewed market, it is imperative that Market Participants (MP) have a reasonable understanding in the application of the mitigation process. OPG realizes that until some amount of operating experience is attained after go-live, it is infeasible for the IESO to have all the answers. Considering the uncertainty¹ and open questions that remain around the application of the mitigation process and its impacts on MPs, OPG recommends that the IESO, together with stakeholders, work to develop a process that will provide MPs and the IESO an avenue to allow for a retrospective assessment of the application of the mitigation framework to ensure it is functioning as anticipated. This process or framework needs to be transparent and allow MPs an ability to assess any mitigation measures imposed on them and the consequent impact on their settlements. Furthermore, should it be determined that the MPM framework was applied erroneously, there needs to be a mechanism that affords the MP an ability to seek restitution. OPG submits that this MPM application review Framework must be developed before final approval of MRP rules in October 2024.</p> <p>¹OPG’s outstanding concerns around the application of the MPM framework is outlined in the section below</p>	Please see the IESO’s response to ID#103.
142.	OPG	MM 0.14.1 General	<p>Uncertainties around the MPM framework and its application, which give rise to developing a MPM application review framework:</p>	Please see the IESO’s response to ID#103.

ID	MP	Section	Feedback	IESO Response
		MPM Concerns	<p>1. As end-to-end testing is not scheduled until mid-January 2025, MPs will not be afforded an opportunity to test various scenarios to understand the application and implications of the mitigation process in advance of final rule approval, which is expected in October 2024.</p> <p>2. The designation of Constrained Areas (NCA, DCA, BCA) has yet to be developed and in some cases, a designation will not be available until 90 days post go-live. Although the manual provides a list (though not exhaustive) of the inputs which will be used in determining the Constrained Areas, without a real example, a knowledge gap remains in their formulation. Understanding Constrained Areas is essential information in the context of the MPM framework as this will indicate where on the grid MPM will be applied.</p> <p>3. OPG appreciates the ongoing work in developing resource specific reference levels; however, many MPs have yet to finalize their reference levels. Should an MP not agree with the final reference levels they are eligible to use the Independent Review Process (IRP). However, as this process has yet to be tested, OPG has concerns whether all disagreements will be settled in time for go-live. Should this not be the case, and a reference level is used in the mitigation process that later is adjusted by way of the IRP process, an MP should have recourse to reimbursement.</p> <p>4. Concerns remain around the Operating Reserve (OR) reference level and the application of mitigation considering co-optimization of energy and OR. The primary concern is related to how operating reserve reference levels will impact dispatch and market efficiency.</p>	

ID	MP	Section	Feedback	IESO Response
			<p>5. In addition to ex-ante mitigation, the new framework also introduces Settlement Mitigation, as an ex-post measure to prevent MPs from exercising market power through make-whole payments (MWP). OPG appreciates the examples provided in the July 23, 2024, Technical Panel education session material; however, at this time those are academic examples and since MWPs are complex it is uncertain how the Settlement Mitigation process will function and how it will impact a MPs settlement amount. To do so, the settlement statement needs to provide the MP with enough data to calculate and understand how the Settlement Mitigation has been applied.</p> <p>6. An incorrect application of MPM could result in unreasonable market outcomes, leading to inappropriate settlement results which will not only have impacts on suppliers, but could negatively impact ratepayers, since the framework and its outcomes have yet to be fully tested.</p>	
143.	OPG	Charge Types and Equations Table 2-4	CT1101 (MRP Updated + Name Change) Equation: Could the IESO please verify the accuracy of the formula for CT1101? The formula divides the sum of NET AQEI and AQEW by 12, including both the RT and DA components. OPG respectfully suggests that the IESO review and evaluate any potential misalignment between the MRP design document and equation specifications for further clarification and resolution.	In this context, where it is being compared with hourly schedule data, AQEI will be multiplied by 12. This is as stated in advance of the definition of AQEI in Section 8 of Appendix 9.3 where it provides “ <i>IESO</i> shall, if for <i>settlement</i> purposes the <i>IESO</i> is comparing hourly and interval data, determine the hourly amounts defined below by multiplying the interval amounts by twelve”.
144.	OPG	Charge Types and Equations	CT1800 (MRP new) makes a reference to s3.4.2.3 in MR Ch.9, which seems that this sub-section is missing. Could	The IESO has corrected this cross-reference, which should be to MR Ch.9 s. 3.4.4.4.

ID	MP	Section	Feedback	IESO Response
		Table 2-4	you please confirm if this is an error, or if there is another place where this information can be found?	
145.	Vlad Urukov-August	MR Ch.0.2 s.3.1.3, 4.1.5	Use of both "market participant" and "person" to refer to the same entity	"Market participant" is not used in either of the noted sections. "Applicant" is used when referring directly to a person who has submitted an <i>application for authorization to participate</i> , as section 3.1.3. "Person" after the IESO has issued an order.
146.	Vlad Urukov-August	MR Ch.0.2 s.4.1.5	How long does the IESO have to issue the extension?	The IESO length of time required to issue an extension will depend upon the circumstances of the particular extension request and so there are no prescribed timelines in the Market Rules or Market Manuals to do so.
147.	Vlad Urukov-August	MR Ch.0.2 s.5.3.3	"Energy market billing period" is not defined in Ch 11	"Energy market" and "billing period" are two back to back, defined terms.
148.	Vlad Urukov-August	MR Ch.0.2 s.5D.3.2	Consider defining consolidated margin call to distinguish from margin call	The IESO is of the view that adding "consolidated" prior to margin call and other prudential related defined terms such as actual exposure, and trading limit sufficiently differentiates these terms, without introducing an unnecessary series of defined terms.
149.	Vlad Urukov-August	MR Ch.0.2 s.5D.4.2	Is there sufficient clarity elsewhere in the MRs what happens if this timeline is not met?	This section 5D.4.2 on the timelines within which a consolidated margin call must be satisfied mirrors the longstanding section 5.6 – Margin Call Requirements and the No Margin Call Option for Physical Transactions. Sufficient clarity of what happens if this timeline is not met is specified in MR Ch.0.3 s.6.3 – Events of Default.
150.	Vlad Urukov-August	Ch.0.4 s.4.1.2	Embedded facility is not defined. Embedded Market Participants Is defined in terms of a facility.	Correct, facility is italicized but embedded is not.

ID	MP	Section	Feedback	IESO Response
151.	Vlad Urukov-August	Ch. 0.4 s.5.1.2	Consider defining “compliance monitoring” and “performance testing”	This section has not been amended by MRP and exists in this current state in the baseline.
152.	Vlad Urukov-August	Ch. 0.4 s.3.1.3	Not a defined term, I believe storage participant is	Agreed. Correction has been made.
153.	Vlad Urukov-August	Ch. 0.4 s.3.1.1 and 7.3.2A	<p>The Appendices are 4.20 to 4.40.</p> <p>Also in these appendices there are references to medium performance standard and high performance standards (not to minimum). It is not clear what defines minimum vs medium etc. Consider adding more specificity</p>	<p>The IESO can confirm that the references to Appendices contained in MR Ch.0.4 s.3.1.1 and 7.3.2A are correct.</p> <p>MR Ch.0.4 s.3.1.1 outlines the performance standards that all equipment connected to the IESO-controlled grid must meet at a minimum, and as indicated there could be additional requirements depending on the resource type.</p> <p>Note that these two sections have not been amended under MRP.</p>
154.	Vlad Urukov-August	Ch. 0.4 s.6.1.1 and 6.2.1	<p>I don’t think either terms connecting market participant or connected market participant are defined.</p> <p>Please define in Ch11</p>	<i>Connect</i> is a defined term in chapter 0.11 of the market rules. MR Ch.0.1 s.7.1.1.3 specifies that when italicized, other parts of speech and grammatical forms of a word or phrase defined in the market rules have a corresponding meaning. Within the context of sections 6.1.1, and 6.2.1, “connecting” and “connected” are grammatical forms of the defined term “connect”, and are correctly italicized. No further definitions are necessary.
155.	Vlad Urukov-August	Ch. 0.5 s.12.1.3.1	Please confirm this (high performance information) is defined. See comments on these terms in Ch 4	Appendices 4.19, 4.21, 4.22 and 4.23 each have tables with column headings that outline high performance and medium performance requirements. Appendix 4.20 contains two rows, one for high performance and the other for medium performance.

ID	MP	Section	Feedback	IESO Response
156.	Vlad Urukov-August	Ch. 0.5 s.6.2.2A	Quarterly and weekly advance approvals are defined terms	The defined terms noted are correctly italicized in the proposal document.
157.	Vlad Urukov-August	MR Ch. 0.9 s.B.1.2 a.	Lower case "C" in commencement	This typographical error does not exist in the proposal document.
158.	Vlad Urukov-August	MR Ch. 0.9 s.6.8.1	I am not sure of the appropriateness of the reference to "in accordance with section 6.8", because section 6.8 itself limits the timelines with subsections that do not include B1.2 (see 6.8.1)	The reference to section 6.8 in this provision refers to the scope and methodology of the notice of disagreement process rather than the timelines for submission. This language is consistent with the wording in section 6.3.14 where the timelines are specified. All of the references to the timelines for notice of disagreement submissions included in section 6.8 are cross-references to section 6.3, which, because section B1.2 is notwithstanding section 6.3, does not raise a conflict or inconsistency.
159.	Vlad Urukov-August	MR Ch. 0.9 s.B.1.2 b.	Market transition completion date is not a defined term. Remove italicization of "date".	The IESO has removed the italics from "date" as suggested.
160.	Vlad Urukov-August	MR Ch. 0.9 s.B.1.2	Not sure what "operation of section (b)" means. Consider re-wording.	The IESO updated this provision to refer to Section B.1.2(b) to clarify.
161.	Vlad Urukov-August	MR Ch. 0.9 s.2.5.1	I am bit uncertain if it is appropriate to define the metering point by talking about arithmetic manipulation of metering data. I think there has to be more clarity as to what the point is and then some additional language that explains that the reading at such points are	This provision is unchanged from the current section 2.4A.1 and amendments related to MRP was not determined necessary.

ID	MP	Section	Feedback	IESO Response
			adjusted in order to represent metering data as if obtained at the point. Consider changing and clarifying further.	
162.	Vlad Urukov-August	MR Ch. 0.9 s.2.5.2	Is the first reference to “registered wholesale meter” intentional? If so, how is it different than the registered wholesale meter ‘m’, ‘c’ or ‘s’ – I also don’t see instances of wholesale meter “c” or “s”	The first reference to registered wholesale meter is intentional and unchanged from the current section 2.4A.2. The current provision also addresses both RWM and RWM ‘m’ to ensure it is captured regardless of the precise approach adopted in a particular instance. This provision was primarily updated for MRP by incorporating the newly added identifiers ‘s’ and ‘c’, representing steam turbines and combustion turbines.
163.	Vlad Urukov-August	MR Ch. 0.9 s.2.10.1	What is the “any other information” contemplated here?	There are many other inputs into the settlement process, including capacity obligations awarded from the capacity auction process. This language is important to ensure all relevant information is incorporated into the settlement process.
164.	Vlad Urukov-August	MR Ch. 0.9 s.2.11.4	Why is the qualifier “practicable” added here? The settlement data is key for participants to shadow settle. I do not think it is a good practice to add undefined terms that allow the IESO to delay sending the data for unclear reasons. I do not support the added language.	It was not the intent to change the timeline requirements to allow for delays. The IESO will delete the word practicable, as suggested.
165.	Vlad Urukov-August	MR Ch. 0.9 s.2.14.1	Can the IESO confirm that the admin prices (given that they are not locational and seem to be subject to a different more complex process) will be available in time for the calculation of the PS. If not clarify how and when participants can expect settlement based on Admin prices.	Administrative prices are, pursuant to MR Ch. 0.7 s. 8.4A.2, required to be established within four business days after the affected dispatch day. Preliminary Settlement Statements are, pursuant to MR Ch. 0.9 s. 6.3.13, required to be issued 10 business days after the relevant dispatch day. The IESO is confident that administrative pricing would be available for the calculation of the Preliminary Settlement Statement.

ID	MP	Section	Feedback	IESO Response
166.	Vlad Urukov-August	MR Ch. 0.9 s.3.1.6	I have made this point previously in regards to AQEI, which has the 't' subscript indicating it's an interval reading. Dividing by 12 in my mind is not appropriate. The hourly (only h subscript) terms need to be divided by 12 precisely because it's an hourly quantity that needs to be represented at the interval level,	In this context, where it is being compared with hourly schedule data, AQEI will be multiplied by 12. This is as stated in advance of the definition of AQEI in Section 8 of Appendix 9.3 where it provides " <i>IESO</i> shall, if for <i>settlement</i> purposes the <i>IESO</i> is comparing hourly and interval data, determine the hourly amounts defined below by multiplying the interval amounts by twelve"
167.	Vlad Urukov-August	MR Ch. 0.9 s.3.1.1 and 3.1.6	Re: "for each settlement hour ..." Can the IESO clarify what resolution will participants receive their itemized settlement file at - an interval or an hourly resolution? The current AQEI based settlement and associated data files is provided at an interval resolution. Is this changing? If so, how will participants assess accuracy at the interval level for their metering data?	The settlement amount is calculated on an hourly basis by summing interval level calculations. Settlement statements and data files will provide interval level information that participants can use to verify calculations. This methodology is not changing.
168.	Vlad Urukov-August	MR Ch.0.9 s.3.1.6	<p>Why is HPTSA presented as one term? A delivery point and an intertie point are distinct in nature and are applied at the resource level, not the participant level.</p> <p>Similar to the question above, why aren't these formulas presented in a manner consistent with how they will appear on settlement statements. For extra clarity, separate formulas for delivery points and intertie metering points will make comprehension easier.</p>	This approach was considered to be less repetitive and simpler.

ID	MP	Section	Feedback	IESO Response
169.	Vlad Urukov-August	MR Ch.0.9 s.3.2.2	LFDA should be defined ("LFDA") the first time it appears.	We have added (LFDA _n) to the relevant provision in section 2.14.2.
170.	Vlad Urukov-August	MR Ch.0.9 s.3.10.4	I don't see a definition or an explanation the abbreviation of EMFC either in Ch9 or Ch9 Appendix. The terms is used frequently but is unclear as to what it stands for.	As provided in the provision, EMFC settlement amount is defined in Section 5.1.2.2.
171.	Vlad Urukov-August	MR Ch.0.9 s.5.1.1.4	"generator offer" is not a defined term, so it's unclear what this means.	<i>"Generator offer"</i> are two back to back defined terms. <i>Generator</i> is a defined term, as is <i>offer</i> , "generator offer" refers to an <i>offer</i> made by a <i>generator</i> .
172.	Vlad Urukov-August	MR Ch.0.9 s.5.1.2.1	Defining terms within the chapter makes cross referencing to Ch 11 difficult. Consider defining in Ch11 if this will be used elsewhere.	This concept is not used elsewhere and was not defined in Chapter 0.11 for that reason.
173.	Vlad Urukov-August	MR Ch.0.9 s.3.10.6 a.i.	I find this type of definition inconsistent with other definitions that state "for participant k, for interval t..." etc. Here MAX_CAP is defined without any reference to time or unit of application which makes this definition not as good as it can be	The IESO has updated the definitions of MAX_CAP and MC to improve the specificity.
174.	Vlad Urukov-August	MR Ch.0.9 s.3.10.6 b.i.	Missing an "is" A am also unclear as to what happens if the bid price is not at the MMCP? Is there an assumption that there will be a quantity with an associated MMCP price. Please clarify.	The provision was amended to add the missing 'is'. Where there is no bid price at the MMCP then there is no minimum consumption level applicable to this calculation.

ID	MP	Section	Feedback	IESO Response
175.	Vlad Urukov-August	MR Ch.0.9 s.3.3.2.1	How is “is activated for operating reserve” defined. How many intervals post activation will fall in this category?	For clarity, the provision was amended to refer to the dispatch of operating reserve. This provision applies for each metering interval for which the resource is dispatched for operating reserve.
176.	Vlad Urukov-August	MR Ch.0.9 s.3.3.3.2	It is very difficult to understand the intent based on formulas alone. Why did the IESO not capture the intent in words as well as formulas Also none of the subscripts are defined here	Repeating obligations in multiple formats increases the risk of error and inconsistencies. These conditions were also considered to be more easily and accurately conveyed as formulas. Note that the subscripts are defined in Appendix 9.2, s.1.2.
177.	Vlad Urukov-August	MR Ch.0.9 s.3.3.4 a and b	Inconsistent use of [and (in these two formulas	These two formulas need a different number of brackets and the usage in each is not inconsistent.
178.	Vlad Urukov-August	MR Ch.0.9 s.3.3.5.1 and 3.3.5.2	What is the “applicable LMP” in this context? Also for multiple PQ pairs, are all offers that are “less than...” adjusted to be the LMP. Please clarify.	We have updated the provision to clarify that the applicable locational marginal price is the real-time market locational marginal price. The IESO can confirm that all PQ pairs that are “less than...” will be adjusted.
179.	Vlad Urukov-August	MR Ch.0.9 s.3.4.1	3.4.1 refers to dispatchable generator resources, whereas 3.4.1.2 refers to hydroelectric generation resources, without qualification as dispatchable. It is also unclear what does it mean for a schedule to be greater than an economic operating point as the term economic operating point is not defined and it also is not present anywhere else in this chapter (in those words)	The provision is already specific to dispatchable resources and it is not necessary to repeat it again here. The economic operating point for all resources is as determined in accordance with MR Ch.0.7 App.7.8 s.2.6.

ID	MP	Section	Feedback	IESO Response
180.	Vlad Urukov-August	MR Ch.0.9 s.3.4.3.1	<p>This section is difficult to process. Assuming this means that an offer price (which may already be a substitution) that is less than \$0 will be adjusted.</p> <p>I am not clear on what is meant by “ii the applicable DA LMP – can’t tell what it’s in reference to nor what will be changed to the lower of 0 and the DA LMP. I assume the LMP can’t change but it doesn’t read that way. Please clarify</p>	<p>This provision is intended to cap the price that a market participant is entitled to through the DAM_MWP. This is consistent with current treatment for CMSC. This provision provides that the IESO will adjust offer prices that are less than \$0 and the applicable DAM_LMP. Where the IESO adjusts such offer prices, it will be adjusted to the lesser of \$0 and the applicable DAM_LMP. The DAM_LMP will not be adjusted by this provision.</p>
181.	Vlad Urukov-August	MR Ch.0.9 s.3.4.4.1	<p>What is the rationale to exclude hours where the schedule is less than MLP. Is that assuming recovery will take place via 3 part offers (Start Cost). Confirm DSO will not schedule in a way where recovery will not take place based on this condition.</p>	<p>Market participants are not entitled to DAM_MWPs when ramping because the resource cannot respond to dispatches during this time. The DAM Calculation Engine will only schedule a GOG-eligible resource below its minimum loading point (MLP) based on the ramp up energy to MLP profile that the market participant submits.</p>
182.	Vlad Urukov-August	MR Ch.0.9 s.3.4.4.2	<p>Why is this qualified as “called for a generation resource or dispatchable resource” – based on the definition a called capacity resource has been called.</p> <p>If there is a temporal condition (called prior to receiving a schedule) define what it means to be called.</p> <p>What will be the visibility of “when the IESO restricts a transaction”? will the IESO publish a report to that effect?</p>	<p>The temporal conditions included in the DAM_MWP ineligibility rules were inadvertent and intended only for ineligibilities related to DAM_GOG and RT_GOG. This is because the DAM_GOG and RT_GOG are over a commitment period and the DAM_MWP is evaluated over an hour. The IESO has made the appropriate correction by removing these temporal conditions from the DAM_MWP. This is consistent with the current approach for CMSC.</p>
183.	Vlad Urukov-August	MR Ch.0.9 s.3.4.4.3 and 3.4.4.4	<p>Use consistent terminology “during any settlement hour” and “for any settlement hour”.</p>	<p>The IESO has made editorial clarifications to ensure consistency and improve the clarity of what is meant by ‘receives a minimum hourly output’. Market participants will be aware of when the hourly must run binding constraint condition is met because such constraints will be included in their settlement data file.</p>

ID	MP	Section	Feedback	IESO Response
			<p>Clarify what does it mean “receives a minimum hourly output” – is that in reference to its schedule?</p> <p>Clarify what does it mean to “receive an hourly must run binding constraint” – how will a participant know if this condition is met.</p>	
184.	Vlad Urukov-August	MR Ch.0.9 s.3.4.4.5	Confirm if such resources bid a cent less than MMCP then this condition doesn’t apply? What is the logic for this condition as drafted?	If a resource bids at the MMCP it is indicating that it intends to operate as non-dispatchable and, therefore, should not be entitled to a settlement amount that is available to dispatchable resources. All bids less than MMCP would not be subject to this condition.
185.	Vlad Urukov-August	MR Ch.0.9 s.3.4.4.6	<p>Is “not operating as a pseudo-unit in hours in which they have a minimum constraint” a condition that will be known by participants?</p> <p>What is the definition of “minimum constraint” as it’s not a defined term?</p> <p>What does it mean to be “consistent with combustng turbine commitment” and is the lack of reference to “steam turbine” (as mentioned in the first part of the definition) intentional?</p>	The “minimum constraint applied for combined cycle operation consistent with combustion turbine commitment” is reason code COMCYC, defined in Market Manual 0.4.3, that market participants will receive in their settlement data files.
186.	Vlad Urukov-August	MR Ch.0.9 s.3.4.5	In previous section “and” was used instead of “or” – make consistent.	The IESO had made edits to improve the consistency of language.

ID	MP	Section	Feedback	IESO Response
			<p>Is there a more formal definition of “hydroelectric generator resources that are not registered on the same forebay as one or more other hydroelectric resources” - may benefit from a definition in Ch11 if this concept is used elsewhere.</p> <p>Change “resource” to “resources” to be consistent.</p> <p>How will the comparison of sum of the quantity of energy scheduled (is that a clear term) and its Min DEL be executed? Will a participant be able to verify such comparison.</p>	<p>The IESO determined a chapter 0.11 definition was not necessary because this language is used exclusively in this section of the market rules.</p> <p>The language of resource/resources is intentional as 3.4.5.1 refers to a single resource whereas section 3.4.5.2 refers to the schedules of multiple resources. The IESO made editorial clarification to better articulate this.</p> <p>The IESO thinks the language describing the comparison of values is sufficiently clear and will provide in settlement data files sufficient information for a market participant to verify the comparison.</p>
187.	Vlad Urukov-August	MR Ch.0.9 s.3.4.5.2	<p>Is “the minimum daily energy limit of such forebay” well defined?</p> <p>I assume the resources have to belong to the same participant?</p> <p>What is the logic that MWP's don't apply if the total schedule is at Min DEL. How does this ensure payment sufficiency at the resource level? Please clarify</p>	<p>MR Ch. 0.7 s. 3.5.26.1 indicates how the minimum daily energy limit (Min DEL) is applied on the forebay. Specifically, it provides “Dispatchable hydroelectric generation resources that are registered on the same forebay shall be collectively bound by the same minimum daily energy limit”.</p> <p>Yes, such resources must have the same registered market participant, as stated in the definition of forebay in Chapter 0.11.</p> <p>The calculation engine will schedule the resources at the forebay in order to meet the submitted forebay MinDEL. This means it may be necessary to schedule the resources uneconomically in order to achieve forebay MinDEL. If the total schedule of all resources at the forebay equals the forebay MinDEL, it would not be eligible for MWP to avoid compensating the resource for an uneconomic schedule that was due to its operational requirements.</p>

ID	MP	Section	Feedback	IESO Response
188.	Vlad Urukov-August	MR Ch.0.9 s.3.4.6	Does “determined” mean calculated and applied – as in eligible	The IESO confirms that this is correct.
189.	Vlad Urukov-August	MR Ch.0.9 s.3.4.7	This should also say for participant ‘k’ for hour ‘h’. Having said that, I am still not clear why this is presented by participant, rather than resource	Section 3.4.1 establishes the meaning of ‘k’ and ‘h’ and there is no need to repeat it in this section as well. The settlement amounts are presented by resource through use of delivery point ‘m’ as well as by market participant with market participant ‘k’.
190.	Vlad Urukov-August	MR Ch.0.9 s.3.4.7	What is “R” in b. in terms of the summation. All types of OR? Why is the MWP presented as one calculation for both energy and OR? Will these not have separate charge codes, allowing participants to separate the two (the four if we look at three classes of OR)?	Note that abbreviations of variables can be found in Appendix 9. Specifically, “R” is identified in App. 9.2 s.1.2.8. The energy and OR determination of the DAM calculation engine are co-optimized. As a result, the MWP is aligning with the DAM calculation engine by calculating both the energy and the OR in a single calculation. The charge codes will reflect separate calculation to provide sufficient information in settlement statements to allow for market participant reconciliation.
191.	Vlad Urukov-August	MR Ch.0.9 s.3.4.7 a and b	Please confirm the appropriateness of the -1x application for these terms.	The IESO confirms that -1 is correct in this instance.
192.	Vlad Urukov-August	MR Ch.0.9 s.3.4.10	Why is this presented as a b., rather than in 3.4.10 as in the other sections.	The reason that ‘m’ is defined separately in subsection b. is because ‘m’ refers to the delivery point associated with both the price responsive load and the hourly demand response resource, but the payment is specific to the price responsive load.
193.	Vlad Urukov-August	MR Ch.0.9 s.3.4.13	I don’t understand what a. means – is it a Boolean 1/0 if the number us equal to max starts per day or the actual number when that is the case. In any case, I think there is an “if” missing.	These definitions do effectively create a Boolean determination and an editorial change was made to clarify.

ID	MP	Section	Feedback	IESO Response
			<p>Similarly for b., is this a Boolean number based on “either” or “hydroelectric resource has not submitted”. If so there is an “if” missing.</p> <p>Please clarify</p>	
194.	Vlad Urukov-August	MR Ch.0.9 s.3.4.13.2.b	IF ‘f’ is a set, how is that applied in FROP, which has no summation over the set. Please clarify.	The set of ‘f’ is reduced to a single value in the definitions of FR_UL and FR_LL. Within the definitions of those variables, it is clarified that the relevant value of the FR_UL/FR_LL is the one, from set ‘f’, where it is equal to DAM_QSI.
195.	Vlad Urukov-August	MR Ch.0.9 s.3.4.13.3 a.	The use of Not Attained Max Starts is unclear – is it Not “Attained Max Starts” or “Not Attained Max Starts” – if the latter is that a Boolean or a number.	The phrase “Not Attained Max Starts” is defined in section 3.4.13.1 and refers to a Boolean, not the number of actual starts.
196.	Vlad Urukov-August	MR Ch.0.9 s.3.4.13.3.c	What does it mean to be “not within a start event” ?	Please see section 2.3.1 and Appendix B of Market Manual 0.5.5 for further information about the determination of a start and start event. This phrase refers to whether the relevant settlement hour falls within a start event, as determined in accordance with these parts of the market manual.
197.	Vlad Urukov-August	MR Ch.0.9 s.3.4.13.4	Where is the concept of s as a number if hours explained in a market manual. Is there assurance that s is not overlapping with the rest of the formulas for h.	Please see section 2.3.1 and Appendix B of Market Manual 0.5.5 for further information about the determination of a start and start event. Whether the DAM_MWP is calculated on a per-start basis or an hourly basis will depend on the circumstances, in particular whether the resource had attained its max starts. It will be calculated either on an hourly basis or a per-start basis, and there will therefore not be overlap between ‘s’ and ‘h’.

ID	MP	Section	Feedback	IESO Response
198.	Vlad Urukov-August	MR Ch.0.9 s.3.4.13.5.3	Is all of this to ensure participants will only receive a positive MWP rather than some other reason related to eligibility	This provision is intended to ensure that all linked resources that form part of a cascade group would only receive a day-ahead make whole payment settlement amount when the net total sum of all components of the day-ahead make whole payment for all linked resources is greater than zero.
199.	Vlad Urukov-August	MR Ch.0.9 s.3.5.2c, 4.5.2b and 4.6.8	<p>Could the IESO explain the justification to not have “the payment for these settlements ... not paid out”.</p> <p>The current process evaluates the appropriateness of CMSCs in relation to incurred costs and participants are able to engage in discussions on appropriateness of costs based on actuals.</p> <p>Why isn’t the current process carried through?</p> <p>Has the IESO assessed impact of this change?</p>	The IESO issued a memo to support the Technical Panel that explains the difference between the current process and the proposed MRP process. The memo can be found on the Technical Panel site.
200.	Vlad Urukov-August	MR Ch.0.10 s.6.1.3.2	Does transmission delivery point need its own definition or is the definition of “delivery point” applied to transmission in a consistent way?	The definition of delivery point includes transmission. As this was not a fundamental component of MRP, a review to determine consistency was not undertaken.
201.	Julien Wu	Ch.0.11 – hourly must run	<p>Please clarify what is meant by “Maximum quantity” below:</p> <p>hourly must run means the maximum quantity, in MWh, below which a dispatchable hydroelectric generation resource is incapable of responding to dispatch</p>	The IESO has removed “maximum” from the definition of hourly must run as it is not required to describe what the quantity submission for hourly must run is intended to do.

ID	MP	Section	Feedback	IESO Response
			<p>instructions due to specific must run conditions which could reasonably be expected to endanger the safety of any person, damage equipment, or violate any applicable law;</p> <p>Please provide examples of actual boundary entities associated with an intertie zone in the post-MRP market.</p>	Boundary entity resources are listed in Appendix C of MM 4.1.
202.	Julien Wu	Ch.0.2 s.4.1.4	Please clarify if 4.1.4. contains an error.	Please see the IESO's response to ID#10.
203.	Julien Wu	MM0.5.4, section 1.1	Please clarify if there is a typo below: "activities performeand the market rules, the market rules shall prevail"	The IESO has inserted missing text and has corrected this error in MM0.5.4, section 1.1.
204.	Julien Wu	MM0.14.1, section 2.2.1 and 3.1	<p>Please consider rephrasing the two paragraphs below as their meaning is unclear:</p> <p>If the full data set is not for the IESO-determined study period, the IESO will use the data that is available in the study period to make the designation and whether the potential constrained area was import constrained in more than 4% of the hours will be assessed against that reduced data set.</p> <p>If full data set is not available for a calendar quarter, the IESO will use the data that is available to make the designation and whether a market participant received ninety percent of the day-ahead market scheduled energy withdrawals or injections will be assessed against that reduced data set</p>	<p>The IESO has corrected the typographical error in section 2.2.1.</p> <p>Section 3.1 has been reworded to improve its clarity.</p>

ID	MP	Section	Feedback	IESO Response
205.	Julien Wu	General	<p>Brookfield Renewable appreciates the opportunity to provide feedback.</p> <p>In addition to the comments above, we wish to highlight our support for the General Letter sent by the Association of Power Producers of Ontario (APPrO) regarding Market Power Mitigation (MPM) dated August 6, 2024. We remain concerned by the inability to test MPM in a satisfactory manner prior to MRP going live (e.g., with actual MPM parameters from individual participants and with actual constrained zone designations set by the IESO). This MRP readiness gap presents a risk where dispatch and settlement outcome—particularly during MRP transition—could be significantly and adversely affected. We ask that the IESO consider the General Letter’s three requests seriously and respond to the industry in a public forum. Thank you.</p>	Please see the IESO’s response to ID#103.
206.	Workbench Energy	Ch.0.11 – Pseudo-unit	<p>The definition of pseudo-unit is clear and does not include the limitations IESO has presented in the IESO Market Manual 1.5. In IESO Definitions, Chapter 11: “pseudo-unit means a dispatchable generation resource associated with a combined cycle plant that is modeled based on a gas-to-steam relationship between one combustion turbine generation resource and a share of one steam turbine generation resource at the same combined cycle plant;”. In IESO Market Manual 1.5, Final Alignment Batch, IESO included a new element to the qualification of a facility to participate with the PSU model that changes the participation opportunity for market participants. Feedback on this change is in the appropriate section below.</p>	Please see the IESO’s response to ID#95.

ID	MP	Section	Feedback	IESO Response
207.	Workbench Energy	Ch.0.1 Introduction and Interpretation of the Market Rules	Market participants would benefit from IESO publishing a Point in Time Market Rules version matrix including current real-time operations Market Rules, transitional Market Rules start- and end-, and post-MRP go-live enduring Market Rules.	The current market rules are published on the IESO website. The final baseline prior to the commencement of the market transition will remain published on the IESO website following the market transition. The renewed market rules will also be published on the IESO website. The transitional provisions are included in the renewed market rules.
208.	Workbench Energy	Ch.0.2 – Drafting Errors	IESO’s Final Alignment Batch File MR CH.0.2. Proposal noted in the footer as IMO_FORM_1087V13.0 REV -21-06 has “Error! Reference source not found” within section 4.1.4. in two locations.	Please see the IESO’s response to ID#10.
209.	Workbench Energy	Ch.0.2 – Drafting Errors	Footer information in the file miscounts the number of pages, finishing on “page 75 of 80” in the final alignment batch file.	The IESO has corrected the error.
210.	Workbench Energy	Ch.0.2 – Drafting Errors	Tab/spacing error identified in section 5.2.7A, on page listed as “page 9 of 80”.	The IESO has corrected the error.
211.	Workbench Energy	Ch.0.2 s.5.3.10A	<p>The calculations for minimum trading limit and default protection amount for generation, electricity storage, dispatchable load or price responsive load amend to reflect the changing MRP price dynamics, requiring 3-years historical LMP in DAM and RTM for dispatchable or historical shadow prices until such time as the 3 years LMP values are available.</p> <p>As written in 5.3.10A.4, where neither of the above is available, “the IESO may use such published prices as the price basis.”</p>	If a new resource is located at an existing facility, the shadow price during the transition period will be used to determine the energy price basis. If the new resource is not at an existing facility, HOEP will be used for the transition period.

ID	MP	Section	Feedback	IESO Response
			It is unclear how IESO will apply this methodology to new entrant market participants whose resources will not have established either historical LMPs or historical shadow prices for their own facilities on which to base the calculations. Will IESO apply OEB published prices or replacement shadow prices for published nodes IESO deems relevant. What decision criteria does IESO to identify a relevant node for use.	
212.	Workbench Energy	Ch.0.2 ss.5.7.2 and 5B.4.2	<p>IESO has enabled physical market participants to provide Prudential Support as 5.7.2.1 Letter of Credit, 5.7.2.2 non-affiliate guarantee, 5.7.2.3 marketable securities, 5.7.2.4 affiliate guarantee, 5.7.2.5 cash if an MP prior to 2004 and low obligation.</p> <p>IESO allows Capacity Market Participants only 5B.4.2 Letter of Credit.</p> <p>This discrepancy in acceptable form of Prudential Support should be reconsidered such that IESO aligns the acceptable forms of PSO across participant types. In particular, where a CMP is also a physical MP, its Capacity Prudential Support should be satisfied with the same form of prudential support already approved by IESO for its market participation activities.</p>	<p>Revisiting the acceptable forms of collateral for capacity market participants is out of scope for MRP.</p> <p>Forms of collateral have and will continue to be determined based on credit risk, and do not have to conform across participation types.</p>
213.	Workbench Energy	Ch.0.3 s.2.5.1A.4H	This section relates to the timeline related to submitting a Notice of Dispute following a Market Power Mitigation Independent Review Process. The IESO has provided 22 business days following the day on which ISO registers reference levels and reference quantities following the IRP. There is concern that the recourse available for	The IESO has robust dispute resolution mechanisms in place to resolve disagreements and expects that they will be able to handle whatever volume of disputes or disagreements may arise following implementation of the renewed market. In addition to these mechanisms, the IESO has also committed to forming a Market Power Mitigation Working Group to allow stakeholders to identify issues

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			unintended consequences of a largely untested Market Power Mitigation framework will prompt a higher volume of Disagreements, Independent Reviews, and Disputes. It is unclear whether Participants will have sufficient information from IESO in the determination of mitigation conditions to support agreement or disagreement with IESO decisions. It is advisable that IESO include a transitional process to enable recourse for MPM-related errors/disagreements/disputes/reviews for market participants in a timely manner to pre-empt the formal Dispute Resolution process, as much as possible.	related to the market power mitigation framework and any unintended outcomes arising from its implementation.
214.	Workbench Energy	Ch.0.7 – Appendices	These appendices have grown from 196 to 507 pages, and include detailed formulas and references that are impossible to interpret upon reading. A detailed analysis or review of this material is not possible. In reviewing this section specifically to identify the treatment of self-scheduling resources, it is noted that the term self-scheduling is absent from the appendix. It is not clear where this dispatch data is integrated as a market participant input into the IESO's dispatch scheduling and pricing processes.	<p>Please refer to the third-party review of the calculation engine appendices which were conducted by Price Waterhouse Cooper to ensure that tool functionality matches the content of the appendices.</p> <ul style="list-style-type: none"> - PwC - MRP DAM Engine Pre-Implementation Review - PwC - MRP PD & RT Engine Review <p>Self-scheduling resources are captured as “non-dispatchable generation resources” within the MR Ch.0.7 Appendices. Non-dispatchable generation resources have also been defined in MR Ch.0.11 to include self-scheduling generation resources.</p>
215.	Workbench Energy	MM.0.14.1 – Physical Withholding Assessment	Ex-post assessment of physical withholding must be sufficiently flexible as to allow dispatchable load resources to prioritize their core business, and withdraw OR offered capacity, in whole or in part, without being subject to physical withholding. By putting an administrative charge on physical withholding of operating reserve on dispatchable load, the MPM framework is essentially making operating reserve a mandatory part of the operating profile. Please clarify	<p>An obligation to establish reference quantities does not constitute an obligation for a market participant to offer into the operating reserve market. Submitting an operating reserve offer is not a mandatory component of a dispatchable energy bid.</p> <p>The intent of establishing a reference quantity for OR is to mitigate the risk of a supplier, be it a dispatchable load or a generator, exercising market power by withholding partial or full capacity of OR. The risk of physical withholding is just as applicable to dispatchable loads as it is to generators since both are suppliers of OR. If a dispatchable load is assessed for physical withholding of OR, the market</p>

ID	MP	Section	Feedback	IESO Response
			where in the market rules that operating reserve is a mandatory component of a dispatchable energy bid.	<p>participant will have opportunity to provide information to the MPM team as to why OR offers were not submitted or partially submitted.</p> <p>The intent of the design is to account for operational characteristics and issues at the dispatchable load facility, and the IESO will only issue notices of physical withholding when a material price impact is determined. Notices of physical withholding can only be issued in circumstances where (a) the MP has offered OR below their reference quantity, (b) the conditions for testing have been met, and (c) both the conduct and impact tests have failed. The IESO will work with stakeholders to develop further clarity on the types of situations, and related evidence, that would be considered responsive to a notice of physical withholding.</p>
216.	Workbench Energy	MM.0.14.2 – Physical Withholding Assessment	It is unclear in the documentation how reference quantities for Energy Storage account for duration requirements related to contract and capacity obligations.	When establishing an energy reference quantity for a dispatchable generation resource at an electricity storage facility, monthly modifiers can be utilized to reduce reference quantity amount to reflect contract obligations. For example, if the resource has maximum capacity of 10MW and is contracted for 20MWh over 4-hour period, then the modifier will equal $10 - 20/4 = 5$. This will result in an energy RQ = $10 - 5 = 5$ MW.
217.	Workbench Energy	General: Pseudo Unit Eligibility	Workbench Energy provides IESO market operations and settlements services to IESO Market Participants, including dispatchable generation, load, and storage facilities, as well as non-dispatchable loads. We facilitate market participation through market registration, operations and settlements. Workbench Energy has been actively engaged in the Market Renewal Program engagements, from high level design through implementation, and is actively participating in the MRP Implementation Working Group and MRP Market Trials. We provide this feedback on the IESO's Final Alignment batch of Market Rules and Manuals from the perspective	Please see the IESO's response to ID#95.

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			<p>of our dispatchable, non-quick start, GOG-eligible generation clients.</p> <p>Market Manual 1.5 Language In the final batch release of Market Manual 1.5, Market Registration, the IESO added a specific condition on the registration of pseudo-units that is significantly impactful to specific market participants. Section 3.3.4.1 on page 46, paragraph 3 states, “The IESO will not approve a pseudo-unit registration request unless all resources designated as part of the pseudo-unit are connected to the IESO-controlled grid at the same connection point.” This condition is demonstrably different from the application of pseudo-unit eligibility in the current market framework, and represents a significant and impactful change to the operation of specific resources putting MRP readiness at risk, and requiring incremental rule consideration. This new condition of pseudo-unit eligibility is inconsistent with the IESO’s definition in Chapter 0.11, “pseudo-unit means a dispatchable generation resource associated with a combined cycle plant that is modeled based on a gas-to-steam relationship between one combustion turbine generation resource and a share of one steam turbine generation resource at the same combined cycle plant;”. There are several facilities registered with the IESO market that operate with the pseudo-unit resource model in the current DACP that this new language would disqualify from continuing to use this participation model in the MRP market design.</p> <p>Impact of New Language on MRP Readiness</p>	

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			<p>Workbench Energy and its clients have been preparing tools and processes to align with the MRP rule changes, including development of financial and non-financial reference levels, preparing tools for dispatch data calculation, submission, management, schedule management, dispatch integration and settlement, for pseudo-unit operation.</p> <p>By introducing this language at this late stage of MRP design, IESO has introduced a gap in the Market Rules that introduces financial risk for affected participants, and adds significant complexity in MRP Participant Readiness activities that are well underway.</p> <p>Additionally, by introducing this language in a Market Manual instead of within the Market Rules, IESO has introduced a significant change in implementation of design that does not fall under the purview of the Technical Panel or Board of Directors; a potential outcome that erodes confidence in the IESO's engagement with stakeholders.</p> <p>Financially Binding Schedule Risk</p> <p>Dependent physical resources in a cogeneration facility may each be eligible for generation offer guarantees and make-whole payments in both the DAM and RTM. With IESO's DAM, PD and RT engines assessing dependent physical resources independently of one another, there is significant risk of the dispatch engines creating unattainable schedules by:</p>	

ID	MP	Section	Feedback	IESO Response
			<p>1. In DAM or PD, scheduling a steam turbine to generate electricity when it has no fuel, that is, when its steam has not been produced by the gas turbine generator and balance of plant equipment from which the steam is generated.</p> <p>2. In RTM, scheduling a steam turbine to increase or decrease its output when its fuel cannot be similarly controlled.</p> <p>3. In DAM, PD or RTM, scheduling a steam turbine to provide operating reserve, or to activate its operating reserve, when its supporting gas turbine is not dispatched in parallel.</p> <p>4. In DAM or PD, scheduling a gas turbine to start and operate at a reference level heat rate that provides the benefit of combined cycle efficiency without scheduling the steam turbine to access that efficiency.</p> <p>Because DAM schedules are financially binding, these outcomes introduce financial risk to Market Participants that cannot be managed within the set of Market Rules that IESO has developed and included in this final alignment batch.</p> <p>Gaps in Market Rules for Managing Dependent Resources</p> <p>If IESO disqualifies currently operating pseudo-unit resources from participating in the MRP DAM and RTM with the pseudo-unit model, the IESO must develop new</p>	

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			<p>Market Rules that enable Market Participants with dependent physical resources to participate in the DAM and RTM with GOG eligibility in such a way as to include flexibility for energy and operating reserve offers, in terms of hours, prices, and quantities, to enable the offering of physical resources in a manner that respects technical dependencies without sacrificing cost recovery and without triggering Market Power Mitigation. The IESO Market Rules limit the ability for a resource to change its offers after the first PD cycle has run at 20:00 on the day-ahead, as outlined in Market Rule Chapter 7, Section 3.3.3.4, 3.3.3.5 and 3.3.3.6. Any unattainable schedule for dependent resources issued after 20:00 on the day-ahead cannot be managed by participants with offer changes. For example, if a gas turbine receives a schedule based on combined cycle offers, and the steam turbine does not receive an aligned schedule, the facility cannot increase its gas turbine offer stack to account for the change in efficiency. A steam turbine that receives an unattainable schedule out of the DAM for hours where the gas turbine is not scheduled to operate cannot remove its offers or increase its offers to remove the schedule. It will be financially bound to its DAM schedule, and will have an operational obligation passed into PD which it cannot maintain.</p> <p>Market Power Mitigation Framework Gap</p> <p>Under the Market Power Mitigation framework, managing this disconnect in resource scheduling with</p>	

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			<p>offers may result in IESO identifying financial of physical withholding on gas or steam turbines. The Market Power Mitigation framework will, as currently scheduled planned, move into production without robust testing, and without sufficient time or opportunity for affected resources to fully re-assess and resubmit MPM Reference Level Workbooks to address the change in eligibility.</p> <p>The impact of MPM on offers that are structured to manage resource dependencies on GOG-eligible resources is unclear, will be untested, and is not considered in the final alignment batch of MRP rules and manuals.</p> <p>Scheduling Efficiency Loss</p> <p>By directing participants with dependent resources in a combined cycle facility to utilize physical offers to align dependent resources, MRP efficiency is lost. The efficiency of 24-hour economic evaluation of 3-part offers for combined cycle resources has been a feature of the IESO's Market Renewal Program.</p>	
218.	Michael Pohlod	MR Ch.9 s.4.13.3.1	<p>This calculation assesses a Dispatch Charge for HDR Resources that fail to provide 85% of their hourly energy in any given dispatch interval T. However, the preamble in section 4.13.3 focuses solely on hourly performance of the resources. To this end, I propose the following revision to section 4.13.3:</p> <p>"4.13.3 Subject to MR Ch.7 ss.19.4.5 and 7.5.3, the capacity obligation dispatch charge settlement amount</p>	MRP has resulted in only minor, consequential updates to the capacity auction market rules. These comments will be considered in future, non-MRP amendments focussed on the capacity auction.

ID	MP	Section	Feedback	IESO Response
			for capacity market participant 'k' at delivery point 'm' in settlement hour 'h' ("CADCmk,h") shall be calculated and collected from such capacity market participant participating with a commercial and industrial hourly demand response resource for each settlement hour of an availability window in which the hourly demand response resource fails to comply with an activation notice <i>in any interval t</i> , as determined in accordance with section 4.13.3.1, and which shall be calculated in accordance with the following:"	
219.	Michael Pohlod	MR Ch.7 s.19.4.18	<p>Chapter 7: UCAP v. ICAP distinction for HDR Capacity Testing</p> <p>The rules suggest that HDR resources should always offer their Cleared UCAP into the energy market. This means that during capacity tests that HDR performance will be based on their ability to provide 90% or more of their cleared UCAP (Chapter 7 Section 9.4.18). This means that a resource that cleared 10 MW of ICAP, but has been derated to 8 MW via a Performance derate from a previous year, will only be tested to 8 MW of Delivered Capacity. If it provides 90% of 8 MW of capacity delivery within the Capacity test, it will be considered a pass and the derate will be removed for future seasons. Does this match the IESO's intention?</p>	Please see the IESO's response to comment ID#218.