

To: IESO – Market Renewal Engagement Team

RE: Feedback - Market and System Operations amendments to Market Rules and Market Manuals

Capital Power is pleased to provide the following questions and feedback for the IESO as it pertains to their July 14, 2023, publication on the Market and System Operations batch of Market Rules and Market Manuals amendments. The questions/feedback are as follows:

1. The Market Rules provide the IESO with ample opportunity to override DAM, PD and RTM calculation engines, which will impact LMPs and settlement amounts for MPs. Can the IESO provide more clarity on how these interventions will occur in reality, and what the impacts would be?
2. While the Market Rules talk about a Narrow-Constrained Area (NCA), Dynamic-Constrained Area (DCA) and Global Market Power Reference Intertie Zones, the Appendix includes additional constraints, including a Broad-Constrained Area (BCA). It is not clear why there is a discrepancy between the Market Rules and the Appendix. We ask that these discrepancies are clarified prior to approval.
3. It remains unclear how the MPM framework interacts with the General Conduct Rule (GCR). Please provide additional clarification.
4. The proposed Market Rules do not appear to account for not following the DAM dispatch instructions for economic reasons. An example of this would be when RT prices are lower than the DAM schedule and it is economic to buy out of a DAM schedule. It is expected that this is not considered a breach of dispatch instructions, but that remains unclear in the current Market Rules.

We look forward to your response to the above items.

Thank you,

Capital Power