

# Member Vote and Rationale – Adjustments to Intertie Flow Limits

## IESO Technical Panel, July 12, 2022

The vote to recommend the proposed market rule amendments (MR-00468) for consideration to the IESO Board of Directors passed at the July 12, 2022 Technical Panel meeting.

### MR-00468 – Adjustments to Intertie Flow Limits

TP Member	Vote and/or Rationale
Nick Papanicolaou (Consumer)	For
Indra Maharjan (Consumer)	For
Forrest Pengra (Residential Consumer)	For
Emma Coyle (Generator)	Against: My reasons for voting are listed below: <ol style="list-style-type: none"><li>1. Stakeholders had not had time to consider the MACD findings which were provided to the TP less than 24 hours before the meeting.</li><li>2. Ontario MSP has stated in its latest report it doesn't believe the IESO has provided a satisfactory rationale for the rule change. This may have changed but has not been made public if it has.</li></ol>

TP Member	Vote and/or Rationale
Jason Chee-Aloy (Renewable Generators)	For
Jennifer Jayapalan (Energy Storage)	For
Vlad Urukov (Generator)	<p>For: The IESO introduced the Adjustment to Intertie Flow Limits in October of 2021. In a memorandum dated September 28, 2021, the IESO explained the Market Rule amendment as adding “clarifying language to the market rules”. In my understanding the IESO had already applied the process as clarified in the amendment and additionally submitted pseudocode demonstrating its presence in the calculation engine. As summarized in communication dated November 22, 2021, further stakeholder engagement efforts did not raise challenges with the IESO proposed clarification; rather participants asked clarifying questions and requested improved communication with the Trader community. In response to a Technical Panel request, in a letter dated July 11, 2022, MACD concluded that the IESO’s actions were not in compliance with the existing market rules thereby giving rise to an interpretation of the proposed Market Rules as an amendment rather than a clarification. Such distinction is important in conceptualizing the proposed language as incremental change to the current Market Rules. The proposed Market Rule amendment, nonetheless, was subject to a stakeholder engagement initiative, which supports an expectation that the changes are appropriate from a participant perspective, a conclusion that in my opinion will not change based on the distinction between clarification and amendment. In consideration to the above, I voted in support of the proposed Market Rules, implemented prospectively, as I believe the language meets the intent of limiting instances when “intertie flow limits do not reflect the supply available in the region, and the unconstrained schedule accepts exports that cannot be met by Ontario resources”.</p>

TP Member	Vote and/or Rationale
Robert Reinmuller (Transmitters)	For: Rationale – I support the MR amendments that provide the IESO the authority to take action and manage the transmission constraints, including the intertie flows. As a reliability coordinator the IESO needs to have the ability to respond to more and more complex situations that develop rapidly and adding this capability to the tools we have is critical in the long run. The MACD compliance review and decision has no bearing on the need that it is in front of us today and only indicates that based on the rules that existed at the time of the event, the IESO did not have the authority to act and manage a potential reliability issue. This further reinforces the reasons why the MR changes proposed by MR-00468, should be implemented to address a gap in authority.
Rob Coulbeck (Retailers or Wholesalers)	Against
Dave Forsyth (Consumer)	For: I voted YES to recommend this rule amendment to the Board. I believe this will reduce costs.
Ron Collins (Energy Related Businesses and Services)	For: I recommend MR-00468-R00 – Adjustments to Intertie Flow Limits to the IESO Board for consideration based on the following rationale:  The proposed changes bring clarity to the mechanism of setting of intertie flow limits for Ontario’s import and export flows. The ability of the IESO to impose limits on intertie flows between the integrated power system and neighboring transmission systems is critical to the IESO’s operations. The suggested adjustments provide an elevated level of transparency and certainty around the IESO’s considerations when forming its estimate of the maximum flow. This will provide a increase level of certainty, clarity and effectiveness to the Ontario Market.
Sarah Griffiths (Demand Response)	For

<b>TP Member</b>	<b>Vote and/or Rationale</b>
Joe Saunders (Distributor)	For
David Short (IESO)	For