



Ian MacRobbie
General Manager
Power Operations

tel 519 3962491
cell 519 384 9085
fax 519 396 2443
ian.macrobbe@enbridge.com

Enbridge Inc.
795 Queen street
Kincardine, ON
N2Z 2Y6

March 6, 2017

Ms. Barbara Ellard
Director - Markets
Independent Electricity System Operator (IESO)
655 Bay Street, Suite 410
Toronto, Ontario
M5G 2K4

RE: Complimenting / adding on to our Comments via our email March 24, 2017 on IESO's Presentation on Market Renewal Stakeholder Meeting in February 24, 2017 and IESO's Market Renewal report dated March 3, 2017

Dear Ms. Ellard :

Enbridge would like to add our very brief comments as a follow-up to our previous submission made by Jay Jayaraman on March 24th, 2017 in an email. In that submission we indicated that we were delayed as we were expecting to receive additional feedback and responses from the Brattle group in order to complete our submission.

We held a call with the Brattle Group (Mr. Walter Graf – Brattle and Frank McCamant – Utilicast) earlier this week. Even though the conversation covered a few general topics re PJM,,ERCOT, etc. we are limiting our comments relevant to the current Market Renewal Process being followed.

During that call we asked Brattle our specific questions around the methodology that they used to look at the SPP, ERCOT and other markets. Brattle indicated that the analysis they had performed was only at an aggregate or system level and they did not include nor did they have specific cost impacts for different generation types. Brattle indicated that this was not in their scope and they do not have the cost information which we were led to believe they had following their analysis.

Brattle informed us that they did not go into this level of detail, as it was not in their scope as provided by the IESO. For individual generators this type of information is necessary for generators to determine how the Market Renewal model may impact our individual assets as well as project economics.

For Enbridge to adequately assess the impact of the different Market Renewal options being considered in this stakeholdering initiative the IESO will need to provide greater level of detail to intermittent as well as other generation types. We remain concerned that the IESO is pursuing Market Renewal Options without having provided Market Participants sufficient detailed information with which to assess the impacts of said Market Renewal, possibly not even having carried out True costing. We ask the IESO to provide the information requested and identified by us several times during our comments and conversations before proceeding too far down a particular Market Renewal path so that Market Participants can make informed decisions.

We continue to believe that the intent of the Stakeholdering process should be such that all Market Participants have had opportunities to truly be able to shape the Stakeholdering process as well as contribute to the Agenda and Timelines for proposed actions. We continue to believe that the estimated benefits from Brattle are very high level “guesstimates”, there are details of the existing Contracts that need to be addressed and we would like to wait to provide further comment until the next stage of this process, when more details need to be available.

Again, thank you for this opportunity.

Sincerely,

A handwritten signature in dark ink, appearing to read 'I MacRobbie', with a long horizontal flourish extending to the right.

Ian MacRobbie P.Eng.

General Manager – Enbridge Power Operations, Eastern Region

cc: Mr. Jay Jayaraman P.Eng. – Enbridge

Mr. Jason Chee-Aloy – Power Advisory LLC

IESO Engagement

From: Jay Jayaraman
Sent: March 24, 2017 5:15 PM
To: IESO Engagement
Subject: RE: Market Renewal - Draft Benefits Case
Attachments: RE: Brief call to discuss your comments on IESO Market Renewal stakeholder engagement

Thank you for sharing the draft Benefits Case and soliciting comments and inputs from MPs. This again falls short in several fronts, we will address what is appropriate for us.

Our comments were due by March 22 and we were unable to respond on time for the same reason as we were delayed last time around. As of the due date for comments from Participants to IESO – answers requested for presentation made in December 2016, as of January 30, 2017 Brattle had not provided us answers to our questions raised during webinar. We fully expected response based on the commitment made by Brattle during the face to face session in December 2016. The same has happened this time around again. During presentations responses indicate relevant appropriate feedbacks will be passed on to participants to be able to give comments back to IESO, but feedbacks are not given or the irrelevant (from our perspective) are given.

We acknowledge Brattle following up on our comments of January 30, directly with us and going back with “Take aways” for the February session. We acknowledge and appreciate your team capturing our comments from our Letter dated Jan 30. In your responses to MP comments, you also indicated that Brattle will directly follow up with us and answer our questions. This was followed by the email attached in this email, wherein Brattle again failed to provide information that they (with your knowledge and support) agreed to provide, instead talked about PJM which and directed us to Utilicast – PJM was never part of our earlier comments or review with Brattle. So we are requesting you to arrange for the follow up call (30 minutes maximum) Brattle offered to have with us + provide us answers from SPP that is supposedly available – because SPP is supposed to have implemented their Market Renewal Program successfully.

In summary, the two outstanding items that is impeding our ability to provide timely responses are:

- 1) The information from SPP on costs and system enhancements incurred by Wind Farm Operators, which we were made to believe is available and will be provided, and
- 2) Brattle offered to call and explain – a 30 minute call, to which we responded “yes”. We need to get that call to hear their explanation + how and why PJM tie into SPP experience.

Upon receiving these and within 1 week we will send our prompt and expedited response to IESO.

Counting on hearing from you soon on this, so we can conclude our comments and recommendations. Thank you.

Jay Jayaraman P. Eng.
CWR Senior Engineer
ENBRIDGE Power Operations
72 Sunnyside Avenue, Ottawa, ON K1S 0R1

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