

IESO Engagement

From: Colin Anderson

Sent: October 23, 2017 9:45 AM

To: Barbara Ellard

Subject: Specific Feedback on Stakeholdereing Process used for Demand Curve Formulation (ICA)

Hi Barbara,

I am filing this specific feedback in response to the discussion that took place on October 18, 2017 regarding the Stakeholder Process to be used for Demand Curve Establishment and Implementation at the ICA Market Renewal Working Group session. Please consider this as written feedback.

AMPCO is happy to continue the discussions on general stakeholding associated with Demand Curves (which elements, when it takes place, etc.), but we feel that the final FERC review that takes place in all other US jurisdictions that were discussed should be replicated in Ontario, with a specific review by the OEB. This review should not take place pursuant to the existing process that is in place for market rule appeals, which is far too legally constrained to be usable.

To that end, we suggest that the IESO adopt this recommendation as their own going forward in the Market Renewal process and confirm with the OEB that the Board would be receptive to fulfilling this role in Ontario.

The OEB process allows for the full participation of stakeholders and renders an impartial, third party decision based on the testing of evidence. The oversight associated with this process is far greater than that associated with other stakeholding activities that may or may not take place as part of the Demand Curve Establishment and Implementation, and already includes clearly established appeal processes. The fact that all other US jurisdictions include this step implies that this final review, and the level of oversight that it involves, is critical to the appropriate establishment of something as critical as a demand curve.

It should be noted that the OEB process need not be onerous. Assuming robust stakeholding has already taken place as part of the Demand Curve Establishment and Implementation, the hearing process could likely be quite streamlined.

As always, we are happy to discuss.

Regards,

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