

Feedback and IESO Response – November 2024

Amendments to MM Part 2.2 Exemption Application and Assessment

Following the Amendments to Market Manual (MM) Part 2.2 engagement session on September 17, the IESO invited stakeholders to provide comments and feedback on the materials presented at the session.

The IESO received written feedback submissions from:

- Ontario Power Generation

The presentation materials and stakeholder feedback submissions have been posted on the IESO [engagement webpage](#) for this engagement session. .

Summary of Feedback	IESO Responses
<p>Topic: Market Manual Changes Relating to the New Amendment Process</p> <ul style="list-style-type: none">• Ontario Power Generation (OPG) would like to see a streamlined and timely exemption process. OPG would also like to see an expedited process for non-material amendments to exemptions. OPG also noted that the new amendment process is set out in a clear manner	<ul style="list-style-type: none">• The IESO agrees that a streamlined and timely exemption process, and an expedited process for non-material exemption amendments would be advantageous to facilitate the Market Renewal Project (MRP) transition. The exemption amendment process does allow for streamlining, where appropriate, and the IESO is prepared to facilitate this work. The IESO may arrange Exemption Panel meetings on an ad hoc basis, which adds additional flexibility to the exemption process.

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<ul style="list-style-type: none"> OPG also asked for clarification if <i>IMO Form 1603</i> was no longer to be used going forward. OPG suggested some clarifications to the wording around “third party notification for amendments” in the manual. 	<ul style="list-style-type: none"> The IESO can confirm that both <i>IMO Form 1413 Exemption Application</i>, and <i>IMO Form 1603 Request to Transfer Exemption</i> are still valid and will continue to be used going forward. The IESO has clarified the wording in the exemptions market manual to indicate that third party notification of amendments will only be provided to those third parties that participated in the amendment process and not those parties that participated in the original exemption process.
<p>General Comments</p> <ul style="list-style-type: none"> Impact of changes to MM2.2: OPG requested opinion from the IESO on how the renewed market would impact OPG’s existing exemptions. Additionally, OPG requested confirmation that OPG’s existing exemptions that are for the duration of life of equipment/facility would still be valid under the new market and updated rules. Ambiguity on Responsibilities: OPG commented on the ambiguity regarding with whom the responsibility lays of ensuring that existing exemptions align with MRP. 	<ul style="list-style-type: none"> The IESO anticipates that exemptions granted based on technical equipment requirements are unlikely to be impacted by MRP. However, the IESO cannot comment on the continued relevance or compliance of a particular market rule exemption. It is the responsibility of the Market Participant to ensure their ongoing compliance with the Market Rules. Market Participants are responsible for ensuring compliance with the Market Rules, as they may be amended. However, the IESO does appreciate the complexities of impact of MRP to Market Participants, and as such the IESO remains committed to assisting Market Participants through this transition. Market Participants can contact the IESO Market Rules team, at exemptions@ieso.ca to discuss any

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<ul style="list-style-type: none"> Clarity on the Exemptions Website: OPG commented that the exemptions website could be more user friendly particularly to allow retrieval and review of information. 	<p>questions or concerns regarding their existing and/or new exemptions.</p> <ul style="list-style-type: none"> The IESO appreciates this feedback regarding the Exemptions webpage and will consider improvements as part of any future planned updates.