

Transmission Rights Market Review – Feedback Form

Meeting Date: July 22, 2020

<u>Date Submitted:</u> <i>August 13, 2020</i>	<u>Feedback Provided By:</u> Organization: Capital Power Corporation (“Capital Power”) Main Contact: Santi Churphongphun Email: [REDACTED]
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Following the July 22, 2020 Transmission Rights Market Review webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the following items discussed during the webinar. Background information related to these feedback requests can be found in the presentation, which can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by August 13, 2020. If you wish to provide confidential feedback, please submit as a separate document, marked “Confidential”. Otherwise, to promote transparency, feedback that is not marked “Confidential” will be posted on the engagement webpage.

Stakeholder Feedback Table

IESO Requests	Stakeholder Feedback
Are there any critical components missing from the Stage 1 assessment and key findings?	Capital Power appreciates the IESO’s efforts in expanding the previous analysis to include all interties as part of the transmission rights (“TR”) market value assessment in Stage 1. The IESO’s July 22, 2020 presentation provided stakeholders highlights of the expanded assessment noting that a <i>TR Review Interim Report</i> will be published by the end of the third quarter for stakeholder comment. Based on what was presented to date, Capital Power generally agrees with the conclusion that TRs play a critical role in facilitating efficient intertie trading but without further details of the analysis will await publication of the report to provide more specific feedback.
Are there additional comments on the revised objective statement?	The revised objective statement being proposed notes that the TR market should, among other things, “[p]rovide net benefits to Ontario ratepayers in the long term.” Capital Power is supportive of this as an objective but recommends that the statement be expanded (or an objective be added) to include bringing net value to key stakeholders that stand to be directly impacted by TR market changes. As such, Capital Power suggests adding the language in red below to statement #2. “Provide net benefits to Ontario ratepayers and enhance the value of intertie participation in the long term.”
Are there other options that should be explored in Stage 2?	Capital Power has no comments on additional options to be explored at this time but notes its interest in participating in the IESO’s proposed focused meetings as part of Stage 2.
Are there other considerations that should be included for the proposed evaluation criteria, process and timeline for Stage 2?	Absent from the proposed evaluation criteria is any consideration regarding fair and open competition. Therefore, Capital Power recommends adding a criterion that considers to what extent options facilitate or hinder TR market competition and any trade-offs that may need to be considered.
Are there any concerns with the IESO proposal to conduct focused discussions with interested stakeholders to explore Stage 2 options in detail?	Capital Power has no concerns at this time with conducting focused discussions so long as the IESO: i) allows open participation to those interested; ii) provides discussion material in a timely and transparent manner; and iii) reports the findings of these discussions while respecting any information that may be commercially sensitive. As stated above, Capital Power is interested in participating in the discussions to explore Stage 2 options.