

Feedback Form

Transmission Rights Market Review webinar – December 14, 2020

Feedback Provided by:

Name: Julien Wu

Title: S. Manager – Regulatory Affairs

Organization: Evolgen by Brookfield Renewable

Email: [REDACTED]

Date: Jan 18 2021

Following the December 14, 2020 Transmission Rights Market Review engagement 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 January 18, 2021. 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.

Feedback Requested

Topic	Feedback
<p>Please provide further comments on the high-value opportunities identified during Stage 2</p>	<p>Evolugen continues to support multiple bid laminations, new on-peak/off-peak products, reconfiguration auctions, and more transparent and timely access to market information.</p>
<p>What are the benefits and risks of hedging day-ahead market net interchange scheduling limit (NISL) congestion costs with transmission rights? Please provide detailed examples, evidence and rationale.</p>	<p>The IESO may want to consider making the NISL congestion component non-binding from the DA Intertie LMP price. NISL events could then still be calculated as an indicator for potential grid reliability constraints, and subsequently communicated via an IESO report.</p> <p>By including the NISL congestion component in the DA LMP, intertie market participants are potentially exposed to extreme Penalty Prices without any opportunity to hedge against them or modify their transactions in time.</p> <p>In addition, market participants have no visibility of other participants' intertie trading behavior, and there are no IESO reports available that would help participants forecast NISL constraints pre-DA submission deadlines.</p> <p>This un-hedgeable risk in turn can lead to less than desired Import/Export DA commitments over the interties, and lead to less competitive TR auctions.</p> <p>In sum, a binding NISL Congestion in the DA LMP would reduce reliability to the grid, as intertie marketers would be less incentivized to participate in the DAM.</p>
<p>Please provide comments on the default changes or any other changes required to the TR market as a result of the relevant MRP changes</p>	

General Comments/Feedback

Evolugen generally supports comments submitted by APPrO in relation to this consultation.