



December 10, 2021

Submitted electronically to: engagement@ieso.ca

Subject: NW Intertie Limits

Evolugen by Brookfield Renewable appreciates the opportunity to provide comments. Please see our questions and comments below:

- To improve transparency, we recommend that the IESO improve their communication protocol so that future intertie events such as a reduction in transmission limits automatically trigger notices to all registered marketers, and not just "active marketers." Marketers do not limit their activities to specific interties: they dynamically change trading behaviour depending on market conditions. In other words, registered marketers are all actively monitoring all interties for opportunities, and can become "active" any time economic conditions align. In addition, unusual IESO maneuvers on particular interties can create unforeseen effects on other interties and other market products (e.g. Transmission rights, Capacity obligation delivery), including subsequent market rule amendments. Marketers should be informed as early as possible to meaningfully participate and engage with the IESO.
- The IESO's November 22, 2021 presentation states that its proposal would have: "Limited impact to the Transmission Rights market, given the low quantities available for auction on these interties." However, while the MB/MN interties' Transmission Rights auctions do have lower volume, the proposed rule change would be applied to other interties with high Transmission Rights volumes. Should a high-volume Transmission Rights intertie experience similar generation deficits and therefore transmission limit reductions before



the implementation of the 2023 energy market, then this proposal would certainly affect high-volume interties with unknown consequences. In sum, the IESO has not evaluated this possibility and its unintended consequences on Transmission Rights auctions in general. If the IESO intends to resolve the NW intertie issue via market rule changes, then Evolgen recommends the IESO limit such rule changes to the NW interties only.

- As Market Renewal now enables capacity exports and imports with neighbour jurisdictions, the reliable use of interties is indispensable for generators to meet the energy delivery associated with their capacity obligation. Please confirm whether the lowering of intertie limits would negatively affect import/export transactions that have already cleared economically. Please respond in relation to market timing. For example, would the lowering of transmission limits prevent transactions from being scheduled and cleared? Or would a cleared intertie transaction become curtailed due to this proposal?
- Please clarify how this proposal would affect wheel-through transactions that have already cleared the market.
- Please confirm that this proposal would not affect internal generation facilities.

Thank you again for the opportunity to provide feedback. We would be pleased to provide you additional information on any of the items contained in this submission.

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