

Feedback Form

Interchange Schedule Code, MrNH – May 22, 2024

Feedback Provided by:

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Date: June 4th, 2024

To promote transparency, feedback submitted will be posted on the [Interchange Schedule Code, MrNH](#) web page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark as "confidential".

Following the May 22, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback on items discussed. The webinar presentation and recording can be accessed from the [engagement webpage](#).

Please submit feedback to engagement@ieso.ca by June 5, 2024.

Specific Comments/Feedback

Topic	Response
<p>Do you have any comments or feedback on issues with the MrNH code that have not been identified by the IESO?</p>	<p>In its presentation, the IESO stated that “[c]harging the IFC is consistent with the practice of other jurisdictions due to the failure of acquiring ramp and transmission”.</p> <p>We are not aware of any other jurisdictions that assess failure charges in these circumstances. Could the IESO please clarify which jurisdictions this reference pertains to and whether the IESO has considered any differences in market performance/transaction failure rates between the jurisdictions that adopt the proposed approach and those that do not?</p>
<p>Do you have any comments or feedback on the proposed changes to the MrNH code?</p>	<p>The IESO’s presentation states that “traders delay cancellation until the final moments, despite their earlier awareness of ramp and transmission status”. The presentation further implies that these “cancellations” are made opportunistically based on the preview of ICP for the relevant hour.</p> <p>However, this fails to consider that, from a trader’s perspective, the purpose of delaying tag submission is to ensure that schedules are confirmed in the final (2nd) run, so that expensive transmission is not purchased in circumstances where schedules are lost in the final run. Additionally, ramp has an expiry time. So, while ramp can be booked beforehand, and transmission may appear to be available when bids are first submitted, one or both could be unavailable closer to the tag submission deadline.</p> <p>We do not believe that failure to secure ramp and transmission in these circumstances can be fairly said to be “within the control of the market participant”. The end result of this change will be to limit trading activity between Ontario and MISO to those market participants who are in a position to purchase expensive transmission in advance without any assurance that they will be scheduled at the relevant times, which will lower trading volumes to the detriment of the market as a whole.</p>
<p>Do you have any comments or feedback on the proposed changes to</p>	

Topic	Response
the MrNH code that have not been considered by the IESO?	

General Comments/Feedback