

Feedback Form

IESO Market Rule Amendments, Chapter 3

Feedback Provided by:

Name: Colin Anderson

Title: President

Organization: AMPCO

Email: [REDACTED]

Date: December 4, 2023

To promote transparency, feedback submitted will be posted on the [Market Rule Amendments, Chapter 3 engagement webpage](#) unless otherwise requested by the sender.

Following the November 21, 2023, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on items discussed. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by **December 5, 2023.** 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.

Amendments

Item	Feedback
Do you have any feedback on the market rule amendments presented and posted for stakeholder review?	See below.

General Comments/Feedback:

I have a number of comments on the rule amendments that are being contemplated:

1. I did not attend the Stakeholder Session on November 21, as I had a prior commitment. These rule amendments appear very significant and require more than an isolated stakeholder engagement session prior to Technical Panel (TP) discussion, with no prior indication that these changes were under consideration. In general, stakeholder processes should be concluded prior to a proposed rule's passage to TP. AMPCO does not believe that adequate stakeholdering has taken place at this point, particularly since these stakeholder comments are not due until the date of the next TP session, when this topic will be discussed. The TP will obviously be unable to appropriately consider these comments.
2. A change in dispute period from two years to 20 days is unreasonable. AMPCO can understand MACD wishing to "close the file" on such matters in something less than two years, but in AMPCO's opinion, 20 days is far too short, and too much of a change from 2 years. There should be some point in between two years and 20 days that is more reasonable.
3. The changes being contemplated for the penalty tables appear similarly heavy-handed. An increase of an order of magnitude (i.e. from \$10,000 to \$100,000) seems excessive for an increase to L4. Similarly, levels L1 to L3 are all increasing by punitive amounts. Perhaps the IESO should consider some more reasonable increases.
4. Disclosure of confidential information for the purpose of enforcing the market rules appears overly broad since it does not contemplate any limiting circumstances, or responsibilities for determining when this is appropriate. This subject requires further discussion.
5. AMPCO is curious about the proposed change in respect of a determination of "particular severity" regarding a market rule breach. In the absence of the IESO Board making the determination of such a breach, who will be the determining party? AMPCO does not think that this accountability should be delegated from the IESO Board to MACD.
6. In summary, AMPCO finds these proposed changes to be somewhat extreme and poorly communicated from a transparency perspective. Additional discussion is required to fully understand the views of all stakeholders.