

# IESO Technical Panel Meeting

## Minutes of Meeting

<b>Date held:</b> March 3, 2020		<b>Time held:</b> 9:00 am	<b>Location held:</b> IESO Office, Toronto
<b>Invited/Attended</b>	<b>Sector Representation</b>		<b>Attended; Regrets</b>
Robert Bieler	Consumer		Attended
Ron Collins	Energy Related Businesses and Services		Attended
Rob Coulbeck	Retailers or Wholesalers		Attended
Dave Forsyth	Consumer		Attended
Sarah Griffiths	Other Market Participant		Attended
Robert Lake	Residential Consumer		Attended
Phil Lasek	Industrial Consumer		Attended
Robert Reinmuller	Transmitter		Attended
Sushil Samant	Generator		Attended
Joe Saunders	Distributor		Attended
Jessica Savage	IESO		Attended
Vlad Urukov	Generator		Attended
Michael Lyle	Chair		Attended
<b>Observers / Presenters</b>			
David Brown	Ontario Energy Board		
Vipul Agarwal	IESO		
Darren Byers	IESO		
Jo Chung	IESO		
Shawn Cronkwright	IESO		
Josh Duru	IESO		
Bryan Hartwell	IESO		
David Short	IESO		
<b>Secretariat</b>			
Jason Grbavac	IESO		Present

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### IESO Technical Panel

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## **Agenda Item 1: Introduction and Administration**

### Chair's Remarks:

The Chair noted that all members of the Panel were present, with three attending by phone.

The agenda was approved on a motion by Joe Saunders.

Robert Bieler asked whether the TP member rationale for Board recommendations submitted in writing following the last Panel meeting should be included in the minutes or included as an appendix, since they were not spoken at the meeting. The Chair agreed and said the IESO would be open to either approach for recording rationale moving forward, and invited members to express their preference. Mr. Bieler said he would be fine with submitting after the meeting and having that be included in an appendix to the minutes, adding that he appreciated a new approach that added to the efficiency of the meetings. Jessica Savage, IESO said an attachment in the appendix would also make it easier for readers to spot the rationales without reading through a whole set of minutes. The Chair polled the Technical Panel and there was general agreement to include future rationales in an appendix to meeting minutes.

The Chair noted three typographical errors in the minutes of the February 4 meeting, and Vlad Urukov suggested edits pertaining to his comments about Energy Limited Resources and whether it should be a defined term in the Market Rules.

The minutes were approved as amended on a motion by Rob Coulbeck.

The Chair reported that the IESO Board had approved the revised Technical Panel Terms of Reference, as well as content guidelines and principles for Market Rules versus Market Manuals, along with the threshold criteria for stakeholdering Market Manuals. He said a special meeting of the Board had been scheduled for March 23, preceded by a Markets Committee meeting March 19, both focusing on the proposed Market Rule amendments for the June 2020 Capacity Auction.

The Chair added that the IESO would be initiating an education process for Panel members in anticipation of the large number of Market Rule amendments anticipated in 2021. He noted the changeover in Panel membership over the last year and the importance of member education before consideration of detailed design documents and draft amendments of MRP begins.

## **Agenda Item 2: Engagement Update**

Jason Grbavac, IESO, referred members to the Prospective Technical Panel Schedule in their information packages, including items on the agenda for the day. He reported that the Minor Rule Amendments Omnibus had been posted for stakeholder comment following the Panel

vote in February and received none, except from Mr. Urukov who noted the use of italicized term energy limited resource and its common occurrence in the generator community suggesting whether it needed to be a defined term. On the June 2020 Capacity Auction, Mr. Grbavac said questions raised by Ron Collins would be addressed in the course of the meeting, along with any other questions from other Panel members.

Mr. Grbavac thanked Messrs. Urukov and Collins for their queries, and the entire Technical Panel for its close attention to agenda materials, including David Forsyth on dispatchable load testing and Sushil Samant on the location of the auction clearing price in the Market Rules package. He underscored the importance of members' role in improving the quality of recommendations to the IESO Board.

The Transmission Rights Clearing Account item was being deferred to a future Technical Panel meeting, likely to its May meeting. Mr. Grbavac explained the topic had been deferred to allow more time for IESO staff to review incoming stakeholder feedback on potential changes to the timing and process for disbursing funds. The discussion will continue at the TRCA engagement forum on April 2 and stakeholder feedback from that meeting will be shared with the Technical Panel.

In reply to a question from Sarah Griffiths, Mr. Grbavac said the IESO had received feedback on the TRCA from the engagement forum as well as the Panel. Mr. Samant asked whether the April 2 discussion would occur during the Market Development Advisory Group meeting. Mr. Grbavac said the TRCA engagement and the MDAG meeting would take place concurrently. Mr. Urukov asked whether five days would be sufficient time to respond to incoming feedback. Mr. Grbavac said that it would likely not, in which case it is being recommended to defer this item to the Technical Panel's May 26 meeting.

Mr. Grbavac said the draft design for the March 2021 Capacity Auction would be shared with stakeholders through the Capacity Auction engagement, with a webinar scheduled for March 12. After that, Technical Panel can expect the process to unfold as it has in the past: panel members will receive advance education on the topic, then they'll be invited to discuss the recommended Market Rule amendments and vote on whether to post them for stakeholder comment, then whether to send the proposed rule amendments to the Board for consideration and approval.

He added that the March 2021 Capacity Auction was originally scheduled for December 2020, but was postponed to March to extend the pre-auction period. The new timing was announced at the February Stakeholder Advisory Committee meeting, a week after the last Technical Panel session.

Mr. Grbavac said draft Market Rule amendments on energy storage may be brought to Technical Panel in April or May. Any updates to the process will be communicated through the Energy Storage Advisory Group (ESAG). An item on performance requirements will be brought to Technical Panel in May, which has already received significant interest from Panel members

and many of the constituencies they represent. In light of that feedback, the IESO agreed to extend and broaden the engagement beyond initial discussions at ESAG. Engagement sessions are coming up, and the IESO will communicate details to the Technical Panel at its May 26 meeting.

He noted that the agenda for the day included a segment of the Market Renewal Education described earlier by the Chair, adding that the recent technical sessions on the energy stream and detailed design demonstrated the value of conducting such sessions before the IESO published draft design documents which is similar to how important education sessions for the Technical Panel is prior to their review of proposed rules in 2021.

Mr. Grbavac reviewed the new framework for stakeholder engagement, through which the IESO will provide greater certainty on the scheduling of meetings to allow stakeholders time to prepare and participate. The new process will better recognize the linkages between initiatives, address concerns about stakeholder fatigue, and seek to combine all advisory group, working group, and engagement meetings within a single two-day period each month to allow stakeholders to plan their timing to participate.

<b>Agenda Item 3: June 2020 Capacity Auction</b>	
Presenter	David Short, IESO Josh Duru, IESO Vipul Agarwal, IESO
Action	Vote on whether to recommend Market Rule Amendment Proposals MR-00441 (R00-R03) to the IESO Board for consideration

Josh Duru, IESO, recalled that the Technical Panel had voted to post Market Rule Amendment Proposals MR-00441 (R00-R03) for stakeholder comment at its February 4 meeting. He said no comments had been received, and drew members' attention to the memo in their information packages detailing a typographical error that had been corrected. Mr. Duru invited discussion on the proposed amendments.

Mr. Forsyth noted the reference to a four-hour maximum for testing of dispatchable loads and asked whether the IESO intended to continue with its current practice of testing at three five-minute intervals. David Short, IESO, said the draft amendments were intended to establish a common definition of testing for all products, including imports, dispatchable, and HDR resources, given the need to determine whether they respond as expected. While the draft amendments provide flexibility for up to four hours of testing, he said the period may be shorter in practice.

Mr. Collins asked about the definition of capacity for import resources, noting that eligible resources are to be associated with the boundary control area in which they operate. Mr. Collins asked whether the resource's ability to import capacity into the province should also be included in the definition, noting that gas generators are required to offer firm, dispatchable

capacity. Without such a requirement for imports, Mr. Collins questioned whether the draft rules would create a disadvantage for local generators.

Mr. Short said gas generators are not necessarily obligated to provide firm service: unless the requirement is set out in a specific contract, they're at liberty to decide from a risk management perspective what level of service they're prepared to offer. For system-backed imports, there will be a contractual requirement for firm service up to the interface with Ontario, and the IESO will also set global and interface-specific import limits that reflect the transmission capacity at the interface. With those measures in place, he expects Mr. Collins concern would be addressed.

Mr. Collins said he didn't see the specific obligation laid out in section 18.9.2. Mr. Short said the obligation for firm service will be clarified in the Market Manuals, and in the agreements with supplying parties.

Robert Lake asked how capacity rates are likely to play out, with variables like behind-the-meter generation, energy storage, and electric vehicles all having an impact on demand patterns. He asked whether the current round of Market Rule amendments would have enough flexibility to accommodate future changes in the load curve that may not be foreseeable today. Mr. Short said the IESO's reliability strategy includes an effort to unbundle and provide incentives for market participation to response to price signals. The current discussion had to do with a product designed to acquire capacity over a specified availability window, either summer or winter, in four-hour obligation periods. The current rules are intended to address capacity by unbundling the services that provide the basis for a Market Participant to make an offer and receive revenue, but participants are free to decide which products to offer into the IESO-administered markets.

In reply to a follow-up question from Mr. Lake, Mr. Short said a one-year obligation period under the Capacity Auction would not be a contract. Rather, the auction process will allow the system to respond as system needs rise and fall, such as in response to the province's nuclear refurbishment cycle or other factors affecting supply and demand.

Mr. Lake asked whether the Capacity Auction will become a permanent function. Mr. Short said he anticipated one auction in 2020 and potentially two in 2021, followed by a shift to a more or less annual auction. The process will not run in perfect sequence during the transition period, as the IESO works to establish the appropriate forward period.

Mr. Samant said he had asked whether the price of the next incremental megawatt procured would be set up like the energy clearing price, when it was previously based on the price of the last cleared quantity. Mr. Short said the point was covered in the Market Manuals, and Mr. Samant said he was satisfied with the reply.

The Chair asked for a motion to recommend Market Rule Amendment Proposals MR-00441 (R00-R03) for consideration by the IESO Board. The measure carried on a motion by Mr. Samant. The Chair invited Panel members to provide the rationales for their votes ahead of the March 19 Markets Committee meeting. Their submissions appear as an attachment to this document.

<b>Agenda Item 4: Minor Rule Amendment Omnibus</b>	
Presenter	Darren Byers, IESO

Action	Vote on whether to recommend Market Rule Amendment Proposal MR-00442 (R00) to the IESO Board for consideration
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Darren Byers, IESO, recapped the history of the proposed Market Rule amendment based on the memo previously submitted to Panel members, and thanked Mr. Urukov for his comment on the draft. He acknowledged the inconsistencies in italicization and use of hyphens for the term energy limited resource(s). He said that this would be corrected in the current draft of the Minor Rule Amendment Omnibus, and for consistency it would be energy limited resources that would be used, with no hyphenation and only italics for the term energy.

Mr. Byers added that the IESO decided not to create a new defined term, given a general preference for only creating defined terms where they were needed for clarity.

The Omnibus was posted for stakeholder comment last month, and Mr. Byers said it received none.

Mr. Samant noted that the term energy limited resource(s) currently refers to water, but asked whether it could apply to storage in the future. Mr. Byers said it might, adding that the energy storage project currently under way would likely use some existing terms, but might also lead to the introduction of new defined terms. Mr. Samant asked whether the solution would be a revised reference to energy/water limited resources. Mr. Byers said it might, but noted that some of the current references to energy limited resources are very specific to hydroelectric resources and would not pertain to battery storage. That concern will have to be balanced against the general preference to limit the number of new defined terms.

Mr. Urukov asked whether the description of energy limited resources in Section 3.6 of Appendix 7.5A sufficiently captures hydro resources. Mr. Byers said he would review the text. Mr. Coulbeck said the specific language was not limited to hydro, and had been used for other resources. Mr. Byers said there would be no intent to use the language in this Omnibus for any other purpose.

The Chair asked for a motion to recommend the Market Rule Amendment Proposal MR-00442 (R00) for consideration by the IESO Board. The measure carried on a motion by Mr. Bieler. The Chair invited Panel members to provide the rationales for their votes ahead of the March 19 Markets Committee meeting, and the submissions received on this topic appear as an attachment to this document.

**Agenda Item 5: Reliability-Related Information**

Bryan Hartwell and Darren Byers, IESO, explained a relatively small change to Appendix 4 of the Market Rules, covering performance and information requirements associated with the IESO’s connection process.

With the introduction of the IESO’s new registration tool a few years ago, some of these requirements have evolved and are now articulated in Online IESO, and as such can be removed from the Appendix of Chapter 4. Specifically, appendices 4.5A through to 4.9 are no longer required. Removing them would be consistent with the principle of describing authorities in the Market Rules and details in the Market Manuals and processes. However, further review revealed that the defined term *reliability-related information* refers to these

appendices and pertains specifically to market registration information. Other, similar wording references (with differences in italicization) have different scope and coverage. So rather than having the terms overlap, the staff proposal was to rename *reliability-related information* to *connection-related reliability information* and use it only in relation to the information provided to the IESO by Market Participants during the connection process.

Robert Reinmuller said he had sent comments on this item in advance of the meeting, explaining that he was comfortable changing the references for the production portion but concerned about rewriting references to reliability-related information that have wider implications for operations, as well as the connection process. Mr. Hartwell said the change would apply only to the fully-italicized term, not the other usages with partial italics. His comment further supported the case for renaming this defined term, to avoid potential confusion with what the term referred to.

Mr. Reinmuller asked whether the terms on page 4 of the PowerPoint presentation would remain the same. Mr. Harwell said the label described in the second bullet point on page 4 of the PowerPoint would change as it wasn't used anywhere else, but not in the references listed in the third bullet, which cover a significantly different concept. He added that the fourth bullet described a catalogue that is in itself a defined term that sets the framework for the Market Manuals and lays out all the reliability-related information involved. Mr. Reinmuller accepted the explanation.

There were no further questions.

#### **Agenda Item 6: Market Renewal Education**

Shawn Cronkwright, Jo Chung, and Jason Grbavac, IESO, recapped the progression and purpose of the Market Renewal process to date, sharing a short video that stressed the need to update and simplify Ontario's electricity market and the potential for \$800 million in net benefits over 10 years. Mr. Cronkwright noted that the electricity system is in a period of transition, and a process was required to ensure effective operations and prepare the ground for future changes. He said the moment calls for a reconfigured system built on a solid foundation, with enough flexibility to adapt and react to shifting circumstances.

He explained that design changes to the energy market were designed to address known inefficiencies, stemming primarily from the current two-schedule system. The transition to a single-schedule system will enable many of the other changes the Technical Panel has discussed, while eliminating out-of-market payments that result from the dual schedule. The IESO's preference, he said, is for a system in which the visibility of market signals is maximized, system needs are met, opportunities to game the system are reduced, and the added transparency supports effective, efficient use of existing assets.

Mr. Cronkwright displayed a graphic that showed the guiding principles for Market Renewal: transparency, certainty, implementability, competition, and efficiency. He said the principles provide a "good recalibration" as the IESO and its stakeholders move into the granular details of Market Renewal.

Mr. Cronkwright presented key milestones for the next stages of Market Renewal, noting that 2020 is expected to be a pivot year for market design and implementation planning. Detailed

design will be completed by the end of the year, implementation planning is already under way, and Market Renewal packages are expected to arrive for Technical Panel review between January 2021 and February 2022.

Mr. Forsyth asked whether the proposed Market Rule amendments will be implemented as they are approved. Mr. Cronkwright said the IESO would endeavour to present all material with enough context to support stakeholder review and strike a balance between two realities: that it would be difficult to assess a single, small piece of the renewal process in isolation, but impractical to postpone all approvals until the end of the process. Ms. Savage asked Mr. Forsyth whether he was querying the approval process or the effective date. Mr. Forsyth said his concern was with the effective date, and Mr. Cronkwright clarified that all elements of the Market Renewal process will culminate on the same go-live date in 2023.

Mr. Samant asked whether all three market streams will go live at the same time. Mr. Cronkwright said that's the intent, given the inter-related nature of the various Market Renewal initiatives.

Mr. Urukov asked whether the intent was to conduct stakeholder engagement on various Market Rule amendment packages, park the comments, then defer decision-making based on Technical Panel review for months to a year. Mr. Cronkwright said the stakeholder process at the design stage had produced two broad categories of comments: specific technical concerns that the IESO made best efforts to reconcile, and broader concerns that could only be addressed with a bigger-picture view of the overall system. He added that detailed design includes a specific look at market rule impacts, in the hope of anticipating any significant, philosophical issues that might show up toward the end of the process.

Mr. Urukov asked whether the IESO would want the Panel voting on individual packages without seeing the entire set of changes. The Chair said the detailed design document will give Panel members a sense of the full package, but agreed that discussion of the review process will be important as the first sets of Market Rule amendments begin to arrive.

Ms. Savage agreed that the interdependencies are important to discuss, while citing prudentials as an example of a topic that will be fairly discrete from the broader design changes. Mr. Urukov cited market power mitigation as a counter-example where it would be important to have the whole package in hand. Mr. Cronkwright said the overall stakeholder engagement process for Market Renewal will need to be flexible enough to accommodate reviews and approvals of both types of topics.

Mr. Coulbeck said that observation was reflected in the detailed design documents to date, with five so far that were largely administrative in nature, covering the ground rules for registering resources. He added that market power mitigation, by contrast, is likely to be a more complicated, interdependent topic. On that basis, he suggested packaging the various design elements to avert any need to grapple with all the items at once.

Mr. Urukov suggested scheduling votes every few meetings, not with every sub-package, so that Panel members can take the more layered information into account. Mr. Saunders agreed.

Mr. Forsyth asked whether a previously-approved rule could still be adjusted prior to implementation. The Chair said the Panel could express concern about a specific rule once it

had the entire context for Market Renewal, at which point staff would seriously consider whether to propose a new Market Rule amendment for Board consideration.

David Brown asked whether the proposed timeline on page 22 of the PowerPoint presentation reflected the types of amendment packages involved. Mr. Cronkwright said the segments had been organized to reflect the distinct pieces required to operate and administer the market, so that provisions for settlements, for example, would be grouped primarily in one section of the Market Rules.

Mr. Lake recalled a visit to Norway and Sweden in 1998, where he witnessed a truly competitive electricity system with multiple hydraulic power stations under separate ownership. By contrast, he said two owners of nuclear stations supply about 60% of Ontario's electricity, and asked how the system would move toward true competition. Mr. Cronkwright acknowledged the question, adding that the IESO still wants different facilities offering into the provincial market as effectively and efficiently as possible, even if there are varying levels of competition between nuclear and wind, for example, versus wind and gas, or different technologies that provide different services to the market and were each selected as least-cost solutions to the province's reliability needs.

Mr. Lake asked whether that means the competition is at the margin rather than the base, since the base is nuclear. Mr. Cronkwright said there has been no suggestion that Market Renewal would fundamentally change the ownership structure in the market, apart from striving for all players to be as competitive as possible. Even within that frame, he reiterated that the IESO had calculated at least \$800 million in net benefits over 10 years.

Mr. Bieler asked about the difference between gross and net benefits on slide 18 of the presentation. Mr. Cronkwright said the difference was the cost of the Market Renewal program. Mr. Bieler asked how the benefits are measured, and how they flow through to the end consumer. Mr. Cronkwright said the province should be able to purchase the electricity it needs at a slightly lower rate, and spend less on the energy transactions that flow through to end users. In reply to a follow-up question from Mr. Forsyth, he said the pathway for savings would depend on the mechanism.

In reply to a question from Mr. Brown, Mr. Cronkwright said not all market charges will be eliminated, but some may be partially avoided. He added that the \$800 million estimate was a minimum, and the 10-year savings from Market Renewal are actually expected to be higher.

Referring to page 17 of the presentation, Mr. Bieler asked whether the estimated saving of \$360 million from reducing the potential for gaming the system had been included in the \$525-million calculation for market efficiencies. Mr. Cronkwright said the \$360 million figure was not included in the \$525 million, and was simply an attempt to quantify the issue, recognizing that it would be difficult to guarantee savings in that area.

Mr. Bieler asked how the IESO would know that gaming was going on, and if so, that it would change. Ms. Savage pointed to past recommendations of the Market Surveillance Panel addressing congestion management settlement credits that were deemed to be inappropriate. Mr. Saunders asked whether Market Participants would be barred from future activity if they were found to have been frequently gaming the system. Ms. Savage said that would be

determined by the IESO's Market Assessment and Compliance Division, adding that multiple Market Rule amendments over the years had sought to address different aspects of the concerns identified with congestion management settlement credits.

Mr. Bieler said gaming might not necessarily mean breaking the rules, so much as managing within the system and interpreting the rules to advantage. Mr. Forsyth said that would depend on a Market Participant's intent. The Chair said this was a much-debated subject, covered by the General Conduct Rule.

Mr. Forsyth asked whether the IESO had ever looked at the cost of the program for Market Participants. Mr. Cronkwright said that through its stakeholder engagement of the Market Renewal business case, market participants were invited to identify their costs and the IESO, didn't receive much feedback.

Mr. Coulbeck said he appreciated the way that IESO staff was approaching the work, adding that the various technical sessions had generated comments that were useful to the IESO and Market Participants alike.

### **Other Business**

There was no other business.

The meeting adjourned at 10:41 AM.

<b>MR-00441-R00-R03, Capacity Auction - June 2020</b>	
<b>TP Member</b>	<b>Rationale to Support Vote</b>
Robert Bieler  Representing Consumers	These revisions to the Market Rules reflect the administrative changes necessary to advance from the Transitional Capacity environment to the Capacity Market environment. While these revisions to the Market Rules may require further adjustments in the future, they do reflect what I understand is required in order to implement the Capacity Market in the desired timeframes.
Ron Collins  Representing Energy Related Businesses and Services	The four market rule amendments support the advancement of the MRP, allowing the IESO to broaden the participation of additional entities and technologies, which in turn benefits the market as a whole. It changes the focus from the organization to specific resources thus improving and clarifying the qualification of resources, while standardizing testing obligations for all resources, hence treating them equitably. The market will benefit from the increased flexibility that is created in the capacity auction with the revision of the obligation transfer requirements that offers the participant the ability to transfer their capacity obligations. The changes to the clearing price mechanism better represents the true cost of acquiring additional capacity, providing clear signals to the market. Finally, the changes reduce administrative burdens for many participants allowing for the operations of a more efficient market.
Sarah Griffiths  Representing Other Market Participants	I support MR-00441-R00-03 to enable the start of the competitive procurement of capacity resources in Ontario. By enabling energy storage and system backed imports to compete against hourly demand response, dispatchable loads and off-contract Ontario based generation, the IESO is moving closer towards technology agnostic procurement to meet capacity system needs.
Robert Lake  Representing Residential Consumers	I support the recommendation to the Board as it will improve the level of competition for capacity, which will benefit consumers, and it will reduce the complexity of participation for potential participants and provide more clarity for the process, which I expect will benefit potential suppliers.
Jessica Savage  Representing IESO	I vote in favor of recommending the Capacity Auction proposed rule amendments to the IESO Board for approval because these amendments enable additional resource types to compete in future auctions as more significant capacity needs emerge.

<p>Joseph Saunders</p> <p>Representing Distributors</p>	<p>I voted "Yes", to recommend to the IESO Board for consideration, the Market Rule Amendments for the June 2020 Capacity Auction, as a result of an extensive consultation process. The four market rule amendments will be an evolution of the demand response auction. At the November 27, 2019 Technical Panel Meeting, the TP was given an informational presentation on the June 2020 Capacity Auction. Following the November 27th meeting, the Capacity Auction stakeholder engagement participants reviewed the draft market rules and provided feedback. At the February 4, 2020 Technical Panel meeting, the TP voted in favour to post the proposed market rule amendments for additional stakeholder comment. Stakeholders have been consulted through multiple engagement meetings, starting August 2019, through to the final design document.</p>
<p>Vlad Urukov</p> <p>Representing Generators</p>	<p>In my assessment, the proposed Market Rules reflect the intent of broadening Capacity Auction participation while retaining all features and functionality required for the continued inclusion of existing participants. The proposed rules appropriately retain and, as required, augment existing features essential for the execution and settlement of the next iteration of the staged Capacity Auction initiative undertaken by the IESO.</p>

<b>Minor Rule Amendments Omnibus</b>	
<b>TP Member</b>	<b>Rationale to Support Vote</b>
<p>Ron Collins</p> <p>Representing Energy Related Businesses and Services</p>	<p>The market rule amendment proposal corrects references made to defined terms and other cross-references and typographical errors, allowing for increase in clarity, certainty, confidence, assurance, and ease of used by all market participants.</p>
<p>Joseph Saunders</p> <p>Representing Distributors</p>	<p>I voted "Yes" to recommend to the IESO Board for consideration, the Minor Rule Amendments Omnibus. The Market Rule Amendments were minor, with corrections to cross-references, typographical errors and references to defined terms.</p>