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August 31<sup>st</sup> 2021

Mr. Jonathan Scratch  
Supervisor, Market Development  
Independent Electricity System Operator  
120 Adelaide Street  
Toronto, Ontario, M5H 1T1

RE: MR-00467-R00

Dear Mr. Scratch,

Capital Power appreciates both the opportunity to again submit comments on the IESO's proposed amendment of the IESO Market Rules, as set forth in MR-00467-R00, and the IESO's ongoing consideration of Capital Power's feedback to date. It is recognized that the IESO has made efforts to take feedback from stakeholders into account, as is largely reflected in the current version in the proposed amendment. Capital Power also recognizes that the IESO is continuing to assess whether, in response to feedback from Capital Power and others, additional changes to the proposed amendment will be made.

Capital Power is broadly supportive of the proposed changes, but would like the IESO to confirm its intended meaning and interpretation of proposed section 7.4.3A. As written, it is not clear whether the amendment as drafted would permit the IESO to override the maximum quantity of operating reserve offer as provided in accordance with Appendix 7.3. Capital Power understand such a scenario to be inconsistent with the final design decision, and thus would like to confirm the IESO's interpretation of the current drafting.

Capital Power again appreciates the opportunity to provide comments and feedback to the IESO. Should you have any questions for us about our comments here, please don't hesitate to contact me at

██████████ or ██████████.

Sincerely,



Emma Coyle  
Director, Regulatory & Environmental Policy  
Capital Power