

Minutes of the IESO Technical Panel Meeting

Meeting date: 05/10/2021
Meeting time: 09:00 a.m.
Meeting location: Video conference

Chair/Sponsor: Michael Lyle
Scribe: Mitchell Beer / Smarter Shift Inc.

Please report any suggested comments/edits by email to
engagement@ieso.ca.

Invitees	Representing	Attendance Status Attended, Regrets, Teleconference
David Brown	Ontario Energy Board (Observer)	Attended
Jason Chee-Aloy	Renewable Generators	Attended
Ron Collins	Energy Related Businesses and Services	Attended
Rob Coulbeck	Importers/Exporters	Attended
Emma Coyle	Market Participant Generators	Attended
Dave Forsyth	Market Participant Consumers	Attended
Sarah Griffiths	Demand Response	Attended
Jennifer Jayapalan	Energy Storage	Attended
Indra Maharjan	Market Participant Consumers	Attended
Nick Papanicolaou	Market Participant Consumers	Attended
Forrest Pengra	Residential Consumers	Attended

Invitees	Representing	Attendance Status Attended, Regrets, Teleconference
Robert Reinmuller	Transmitters	Attended
Joe Saunders	Distributors	Attended
Vlad Urukov	Market Participant Generators	Attended
David Short	IESO	Attended
Michael Lyle	Chair	Attended
Secretariat		
Agatha Pyrka	IESO	Attended
IESO Presenters		
Darren Byers		
Tim Cary		
Adam Cumming		
Declan Doyle		
Darren Matsugu		
Jessica Tang		

Agenda Item 1: Introduction and Administration

Agatha Pyrka, IESO, welcomed participants and reviewed logistics for the virtual meeting.

Chair's Remarks:

The meeting agenda was adopted on a motion by Robert Reinmuller.

The minutes of the July 27 meeting were adopted on a motion by Jennifer Jayapalan.

The Chair welcomed Nick Papanicolaou to the Technical Panel as a representative of Market Participant Consumers and Mr. Papanicolaou briefly introduced himself.

The Chair announced that the IESO Board of Directors had reappointed Sarah Griffiths, Joe Saunders, and Dave Forsyth for additional two-year terms on the Panel, and also approved new measures for the December 2021 Capacity Auction at its August meeting. He said the recommended Clarifications to the Market Rules (Omnibus) would be scheduled for the October Board meeting if the Panel adopts a motion to recommend.

The Chair reminded participants to watch for the forthcoming list of the Panel's proposed meeting dates for 2022.

Agenda Item 2: Engagement Update

Ms. Pyrka advised that the Technical Panel's vote on whether to recommend Board approval of proposed Market Rule amendments on Improving Accessibility of Operating Reserve had been deferred to November, after the IESO received feedback from two stakeholders. With the amendments targeted for a vote at the December Board meeting, the shift in timing will have no impact on the effective date in 2022, and will allow IESO staff and a number of dispatchable loads more time to review the impact to their existing exemptions.

Ms. Pyrka noted that the day's agenda included a vote on whether to recommend the draft Clarifications to the Market Rules (Omnibus) for Board approval, as well as an education item and vote to post on Proposed Adjustments to Intertie Flow Limits and an education item on the Market Power Mitigation batch under the Market Renewal Program.

The updated Prospective TP Schedule also includes an education item on Updates to Synchrophaser Monitoring Requirements in November, leading to a vote to post in December. Ms. Pyrka referred Panel members to two additional memos on current engagement initiatives.

Agenda Item 3: Clarifications to the Market Rules (Omnibus)

Darren Byers, IESO, recalled Panel members' concerns about possible unintended consequences of deleting a section from Chapter 5 of the Market Rules. After discussions with Vlad Urukov and his team, the proposed deletion was removed from the amendment.

Mr. Urukov had noted a previous change that was omitted from the posted draft. IESO staff had agreed and reposted the proposed amendments.

On a motion by Mr. Urukov, the Technical Panel voted to recommend the Clarifications to the Market Rules (Omnibus) for Board approval.

Agenda Item 4: Adjustments to Intertie Flow Limits

The Chair said the September Technical Panel had been rescheduled to allow more time for IESO staff to reflect on the proposed amendments and consider a path forward.

Darren Matsugu, IESO, explained that intertie flow limits on both exports and imports already exist in both parts of the current two-schedule system. Recent restrictions on exports can be traced to the significant supply and reliability issues triggered by drought and resulting low water levels in Northwestern Ontario. The situation was exacerbated by delays in bringing the new East-West-Tie

between the Northwest and Northeast regions into service. Export limit restrictions took effect August 23, with active traders notified by email and the IESO coordinating with other system operators to ensure they were aware of the shift in the region. He said the conditions in the Northwest did not require any change in the dispatch algorithm.

Mr. Matsugu said the restrictions could be alleviated by sufficient precipitation in the region, and would improve once the new East-West Tie is available as of Q1 2022. Under Market Renewal, future restrictions under similar conditions would be reflected within the single-schedule market.

To help ensure transparency and clarity in the market, he said the IESO was proposing a Market Rule amendment to specify when internal transmission constraints will be considered in setting intertie flow limits. It would seek to explicitly recognize that intertie flow limits are applied in both the constrained and the unconstrained schedule, as they are today, and clarify that security limits apply to or from intertie zones.

Mr. Matsugu explained that the proposed Market Rule amendment would not result in a change to the dispatch algorithm, but would simply align the language in the pertinent appendix with the mathematical equation already captured elsewhere in the Market Rules.

Rob Coulbeck said there had been lack of transparency and timeliness in communicating the restrictions to market participants, and suggested that future notices of a similar nature be sent to primary contacts at the companies involved in electricity trading as well as the common emails that were used this time. Mr. Matsugu acknowledged this and indicated the IESO will review the communication protocol used for this item.

Mr. Coulbeck asked about the economic impact of the limit change. Mr. Matsugu said the limit change had addressed the primary economic risk by averting the potential for CMSC payments. Mr. Coulbeck clarified that he was asking about the broad economic impact of implementing the change. Mr. Matsugu replied that the IESO was introducing the rule change in the interest of greater transparency and clarity, and that the specific adjustment to intertie flow limits reflected a relatively unique set of system conditions.

Mr. Coulbeck suggested the proposed market rule amendments were too broad as an intended response to a localized issue. Mr. Matsugu said system conditions in Southern Ontario are quite different from the North, but, while the likelihood of requiring intertie limits is significantly lower, it could happen.

Mr. Coulbeck said that observation pointed back to the threshold at which the IESO would introduce intertie limits. He reiterated that the problem was largely limited to the Northwest and suggested a sunset provision to phase out the amendment once the East-West Tie is in place. Mr. Matsugu said IESO staff would consider the recommendation.

Mr. Urukov asked why the IESO had not circulated the proposed amendment for stakeholder feedback before seeking a Technical Panel vote to post for further comment. Ms. Pyrka noted that the normal engagement process takes several months, and the IESO thought the current approach was most suitable to expedite the issue. She said energy traders would again be invited to comment following a vote to post.

Mr. Urukov asked whether the intertie limit had been set to zero. Mr. Matsugu said that decision depended on the date and system conditions. Mr. Urukov said exports did reach zero for a few days,

and suggested that the amendment requires greater transparency on system constraints and conditions.

Mr. Urukov said Ontario Power Generation did not receive the notice to Market Participants about the August limit change. Mr. Matsugu acknowledged the point.

Mr. Urukov asked Mr. Matsugu to clarify the comment on Slide 5 of his presentation that the issue will ultimately be resolved with the introduction of the single-schedule market under Market Renewal. He added that Market Renewal might solve the financial predicament facing the Northwest, but not the reliability issue. Mr. Matsugu explained that if similar conditions occurred in future, an export would simply not be scheduled under the new system and prices would shift accordingly. He agreed that the specific bullet point in his slide related to financial impact, not reliability.

Mr. Urukov asked how frequently the IESO assesses conditions when a region faces drought conditions. Mr. Matsugu said the real-time operations group continuously monitors supply based on submitted offers, as well as transmission capacity.

Emma Coyle asked whether the IESO believed the August 20 email to traders was in compliance with current Market Rules. The Chair confirmed that is the IESO staff interpretation. On that basis, Ms. Coyle asked whether the proposed amendment was meant to explain the Market Rules, rather than interpret them. Mr. Matsugu said the intent was to clarify the considerations in setting maximum intertie flow limits, make the process more transparent, and correct the appendix text to reflect the existing bidirectional nature of the limits.

Ms. Coyle queried the process for bringing the proposal to Technical Panel prior to stakeholder engagement when the goal was to engage and communicate with traders. She said it would be useful to see what the IESO conveyed to the market about how the proposed amendment would support the Market Rules.

Ms. Coyle added that this was the second time she'd seen a clarification of this nature brought to the Technical Panel, when it is not the Panel's role to act as an adjudication body on the interpretation of the existing Market Rules. She said she had significant concerns about the practice that she specifically wanted to put on the record.

The Chair agreed that the Technical Panel is not mandated to interpret the existing Market Rules and said that was not the request before members. He said the IESO had acted in accordance with its authority on August 23, and that the current proposal was intended to provide greater transparency and clarity to Market Participants.

Ms. Coyle asked whether there was a record to indicate that the proposed amendments refer back to the appendix rather than the equation governing intertie limits. Mr. Matsugu and the Chair said staff would report back on the question.

Mr. Reinmuller provided additional context on the situation in Northwestern Ontario over the summer, noting that drought conditions had led to a "very unusual" forest fire season that in turn triggered an emergency order shutting down forestry, road work, or any other activity that could exacerbate current conditions. In seeking to clarify the Market Rules, he said the IESO must factor in the reality that similar conditions could become a recurring seasonal event, calling for greater transparency and awareness on the potential for intertie restrictions.

Mr. Reinmuller explained that future wildfire seasons would again lead to work restrictions in a region when regular maintenance and development work are already limited to months when outdoor work is feasible, he said, and the need for restrictions can emerge overnight, leaving no time for routine outreach to stakeholders. To prepare for that future, he suggested the IESO develop a transparent set of trigger points and consequences so that Market Participants know what to expect.

Mr. Matsugu thanked Mr. Reinmuller for that context and added that the exceptional supply conditions over the summer were due to a lack of precipitation, but noted that similar conditions could become more regular in future years.

The Chair acknowledged members' concerns about the notification process and whether formal stakeholder engagement should have occurred prior to the Technical Panel discussion. He said he could see arguments both ways and suggested that the Panel proceed with the day's vote, circulate the draft amendment for stakeholder comment, then consider next steps in the event of significant stakeholder feedback.

Mr. Urukov clarified that he was not arguing that the IESO should have stakeholdered the draft, but simply asking why it did not.

The Chair invited further comments on the process and, hearing none, called for a resolution to post the proposed amendment for stakeholder comment. The motion was defeated on a roll call vote.

In favour: Jason Chee-Aloy, Ron Collins, Joe Saunders, David Short, Indra Maharjan, Rob Reinmuller

Opposed: Rob Coulbeck, Emma Coyle, David Forsyth, Sarah Griffiths, Jennifer Jayapalan, Nick Papanicolaou, Forrest Pengra, Vlad Urukov

The Chair called for a five-minute recess following the vote.

The Chair said staff would commence engagement on the matter, update the Panel over the next couple of weeks on how the engagement would proceed, then provide a status update at the November meeting.

Mr. Coulbeck thanked the IESO for reassessing its plans and providing an opportunity for appropriate stakeholdering.

Agenda Item 5: Market Renewal Project

Declan Doyle, IESO, said stakeholder engagement is at the core of the Market Renewal journey. He pointed to stakeholders' role at both the high-level and detailed design stages and summarized the IESO's engagement channels, including Engagement Days, the bimonthly meetings of the Technical Advisory Group, reference level consultations, and bilateral discussions with stakeholders.

Mr. Urukov asked whether an October 15 submission deadline had been mentioned in the most recent round of Engagement Days, and when the IESO expected to publish and respond to stakeholder feedback. Mr. Doyle said that was the deadline for comments on the second batch of proposed Market Rules and amendments on Market Power Mitigation. Depending on the volume of and type of comments received, he said the IESO hoped to publish all the feedback within a couple of weeks of the deadline and respond by year's end.

Joe Saunders said the LDC Preparedness Group had focused most of its attention so far on education and awareness, but expressed concern about whether local utilities will be ready for Market Renewal implementation, particularly for changes in settlement procedures. He noted that LDCs are subject to more regulation and asked about timelines and processes for changing the Ontario Energy Board codes and regulations that correspond to the issues addressed through Market Renewal. Mr. Doyle acknowledged the concern from the LDC community, and reiterated the importance of the ongoing engagement and discussions with LDCs to identify and resolve potential implementation challenges. Mr. Doyle further noted that the OEB would be conducting their own engagements with sector participants to ensure that the corresponding changes happened.

David Short, IESO, asked about the progress of recent bilateral consultations on reference levels and how they might be affected by changes in the Market Rules. Mr. Doyle said those discussions had begun with higher-level group discussions with participants, then drilled down to bilateral discussions in areas that would have a direct impact on the Market Rules. Tim Cary, IESO, said those consultations had helped guide the development of draft Rules and Manuals, particularly through an earlier document that formed the foundation for Market Manual 14.2 on reference levels. The IESO published the first draft in August 2020, conducted a series of seven stakeholder discussions between August and November, updated the content to reflect stakeholder feedback, and produced an FAQ document as a learning tool for anyone who was less familiar with the process. Mr. Cary said the experience was a great example of the value of stakeholder consultation, particularly in developing the approach to opportunity costs and incorporating concerns from hydroelectric operators.

Mr. Saunders said the LDC Preparedness Group was particularly interested in no-wires solutions and energy storage options that seemed to be absent from the detailed design. Mr. Doyle said some of those elements would be included in the Market System Operations batch and acknowledged the need for training and education to ensure that LDCs, and all participants, could access those opportunities.

Jason Chee-Aloy acknowledged the Market Renewal engagement updates but asked for more detailed information on key stakeholder discussions. For example, while hydroelectric generators have been engaged individually or through their trade association, he said the discussions are not always easy and could have a bearing on the content of the Market Manuals. That level of detail, he said, will be important to ensure the Technical Panel is in a position to discuss Market Rule amendments.

Mr. Doyle said the discussions with the Ontario Waterpower Association have overall been positive and constructive, and asked how best the IESO could report back on the large, varied range of bilateral sessions it conducts with different groups of Market Participants. Jessica Tang, IESO, explained that the bilateral discussions on reference levels cover confidential material, but assured the Panel that the IESO reports back any broader issues that are applicable to the stakeholder community or the Market Renewal process.

Mr. Chee-Aloy expressed concern that some of the IESO's information requests to operators may not be realistic, noting as an example that original manuals don't exist for waterpower facilities that are 50, 60, 70, or 100 years old. He said it will take time to understand the full impact of Market Rule and Manual changes that dig down to that level of detail.

Mr. Urukov asked whether it would be appropriate for Technical Panel to discuss the Market Power Mitigation batch at its November meeting when the IESO will not post its responses to stakeholder comments until the end of the year. He recommended shifting the topic to the December meeting, or

the first session after the IESO can provide its feedback.

Mr. Urukov added that the bilateral discussions with stakeholders must remain highly collaborative as a way of defining what will be discussed and decided in the new Market Rules. Over the course of the process, he said, stakeholder deliberations might point back to earlier decisions in the Market Renewal process that have to be reopened at a later stage.

Ms. Tang recalled that the process introduced to the Technical Panel in April was designed to allow sufficient time for members to review large volumes of material and documents prior to posting. She said the November education session on Market Power Mitigation would not call for a vote to post, but would be devoted to guiding members through the batch documents. Ahead of that discussion, she advised the Panel that the IESO had posted a set of documents that had been strengthened through stakeholder feedback and that the IESO is confident in sharing with the Technical Panel. She said any additional input would be incorporated in a new version, to be brought back to the Panel in January for a vote to post for further stakeholder comment.

Mr. Urukov asked that any significant feedback from the October 18 engagement be included in the November information package. Ms. Tang said the November presentation would include a high-level briefing on the incoming feedback.

Mr. Cary responded to an earlier comment from Mr. Chee-Aloy acknowledging that it can sometimes be challenging to identify the appropriate supporting documentation to provide, as every resource on the Ontario system has unique operating characteristics, traits, and information needs. He said the IESO had acknowledged that some facilities are very old, and was prepared to work with participants to set the right expectations for documentation, given that the participants themselves have the best understanding of what documents are available.

Indra Maharjan asked whether any consideration had been given to waste-water to energy projects. The Chair said that is more relevant to IESO's resource acquisition work, and Ms. Pyrka suggested that Mr. Maharjan review the optional engagement memo, specifically on the sections that reference resource adequacy and enabling resources.

Ms. Tang added that a memo has been posted that is intended to close the loop on a topic brought up at a previous Technical Panel meeting related to the concern that price responsive loads could not participate as part of a virtual hourly demand response portfolio and the question if this concern would be added to the MRP 'parking lot'. Ms. Tang stated that the underlying issue falls outside the scope of Market Renewal and that this issue would be addressed at an engagement on enabling resources later in the month.

Dave Forsyth said he was disappointed to read the memo. He said the issue as it pertained to loads was first raised in 2020, and there was plenty of time to address it before the 2023 go-live date for Market Renewal, with price responsive loads included in the demand response portfolio as a new registration process. While the IESO's response indicated there was nothing preventing PRLs from providing demand response, Mr. Forsyth said that comment only applied to the physical resource, when the question was about virtual resources. He said it was inappropriate to postpone the discussion to another engagement.

Ms. Tang acknowledged the comments, explaining that the IESO had introduced price responsive loads to add flexibility for non-dispatchable loads and that there would be no restrictions in the new energy market established through the Market Renewal Program. But she said the underlying issue

had existed prior to Market Renewal, and correcting it would not be a part of MRP scope. In addition to the upcoming enabling resources engagement, she said she would be prepared to continue the discussion offline.

Mr. Forsyth said virtual resources include a lot of non-dispatchable load and expressed concern that the IESO is limiting those resources, rather than looking for an innovative market. He said the option of settling them in the day-ahead and real-time markets is available in most North American markets, and with virtual traders allowed to participate in Ontario, a similar mechanism should be available for PRLs. Ms. Tang said the IESO wasn't removing any options for non dispatchable loads, just specifying how the PRL resources can participate in the virtual portfolio¹. Ultimately, she said, excluding the issue from Market Renewal was driven by time and cost considerations. Mr. Forsyth said the question should have been a part of MRP from the beginning.

Mr. Forsyth said the issue could also have been opened up to bilateral discussion as a starting point for wider engagement. Sarah Griffiths said her community had been raising the issue for years, but had been asked to sit back. She expressed support for Mr. Forsyth's concerns and added her own disappointment that the issue was left out of Market Renewal. Ms. Tang encouraged Mr. Forsyth and Ms. Griffiths to attend the October engagement and reminded Ms. Griffiths that nothing was being removed from existing capacity auction participation. Ms. Griffiths replied that they'd been attending and sharing their concerns for years, adding that excluding the issue from Market Renewal would leave it unresolved for another two or three years, on top of the six years it has already been under discussion. Ms. Tang advised against presupposing the outcome of the upcoming enabling resources engagement and said she would welcome further conversation on the matter. Ms. Tang reiterated that Market Renewal will enable PRLs, with no restrictions on their participation in the energy market. Ms. Griffiths said the benefit of virtual aggregation, which the IESO has been discussing for years, will be left out. Ms. Tang acknowledged the point with respect to the capacity auction.

Ms. Tang went on to state the general stakeholder population will be made aware of the "parking lot" of pending issues during the engagement sessions if they have not been addressed through edits. She again encouraged Panel members to take part in the engagement sessions on future MRP batches.

Tim Cary, IESO, delivered a background presentation on Market Power Mitigation and the issues that will arise post-Market Renewal.

Mr. Urukov queried the options for reference levels on Slide 11 of the presentation. Mr. Cary said the options are selected in specific order in each market.

Mr. Chee-Aloy asked whether the dispute mechanism in Chapter 3 of the Market Rules could be invoked if the IESO determined that a generator had physically withheld supply, then levied a settlement charge with which the generator disagreed. Mr. Cary said all the normal authorities and remedies would be available to Market Participants.

Mr. Urukov asked what form of notification Market Participants would receive if they failed the validation process on Slide 18. Mr. Cary said the matter was currently under discussion, but the IESO

¹ Clarification of terminology: This discussion was in reference to a non dispatchable load (NDL) electing to participate as a price responsive load (PRL). In this case, the PRL is not able to participate as an hourly demand response resource as part of a virtual portfolio within the capacity auction due to real-time modelling constraints. Whereas an NDL is able to participate in a virtual portfolio within the capacity auction.

envisioned very quick feedback on the notification. He said the notification would include the reason for rejection, the reference level, and any other information that would help a Market Participant understand which resource had been rejected and why.

Ms. Griffiths asked whether the procedures described on Slides 22 and 23 represented a settlement charge or a clawback. Mr. Cary said it could be either, depending on whether the adjustment entailed a price or a make-whole payment. If an assessment concluded that a make-whole payment was too high, the system would issue an after-the-fact adjustment. If it had to do with price, a new settlement charge would likely show up on the Market Participant's settlement statement.

Ms. Griffiths asked if there would be further charges. Mr. Cary said there would be some consideration of the frequency with which a participant or resource was found to have physically withheld power, and referred members to documentation on the Market Rules and Manuals for details on how that determination would be made. He said the goal was to provide an active incentive or multiplier to dissuade participants from attempting to exercise market power in this way.

Ms. Coyle asked whether there would be any inquiry into a Market Participant's intent. Mr. Cary said the focus was strictly on market impact, through two lenses: whether the system provided the right incentives for participants, and the ability to assess impact at the level of a single resource. Since this would be a post-settlement assessment, he explained, the goal would not be to fully assess net market impact, but to get a directional view of the situation.

Ms. Coyle asked whether the IESO was inferring that frequency, as the basis for the penalty, constituted circumstantial evidence of intent to exercise market power. Mr. Cary reiterated that the IESO was making no inferences about intent.

Mr. Urukov noted the complexity of the topic and asked whether a sandbox process would help simulate a comprehensive market solution. Mr. Cary acknowledged the point, suggested it might be addressed more fully by the Technical Advisory Group, and invited advice on how the IESO could best respond. Mr. Urukov said he had no recommendation, just the observation that testing the new set of rules would help identify any need for adjustments. Mr. Cary said the specifics of the Market Power Mitigation process would be integrated in the calculation engine rules.

Mr. Chee-Aloy expressed concern that some aspects of the detailed design process for Market Renewal had not been carried over into the revised Market Rules and Manuals, including material dealing with application constrained areas. He said the most appropriate division of content between the Rules and Manuals will be a continuing concern, adding that he looked forward to seeing stakeholder comments on the Market Power Mitigation batch in advance of a vote to post the draft amendments for further stakeholder comment.

Agenda Item 6: Joint Technical Panel/Board Meeting Agenda Topics

The Chair recalled that last year's Joint Technical Panel/Board Meeting had convened virtually with brief remarks by the IESO Board Chair and IESO CEO, followed by questions and discussion. He invited members to identify agenda topics for the meeting.

Ms. Griffiths suggested a discussion on the functioning of the Markets Committee and whether the Board is receiving the advice it needs from the Technical Panel.

Mr. Reinmuller recalled the earlier discussion on the uncertainties facing the IESO system in relation to climate change and fossil fuels. He proposed an agenda item on how the IESO Board looks ahead to the next decade in the interest of making knowledge-based decisions on strategic concerns like the continuing integration of renewable energy and the role of natural gas. The Chair said the IESO's natural gas study would soon be published and encouraged members to read it prior to the joint meeting.

Mr. Maharjan suggested an agenda item on distributed energy generation, the potential contribution of behind-the-meter resources, and the limitations on that activity.

Other Business

The Chair reported that the IESO had conducted a new scan of the insurance market to determine the availability of coverage for negligence, rather than being limited to gross negligence. He said the more extensive coverage was still not available and undertook to report back with further information.

Ms. Coyle asked why engineers working for the IESO were unable to receive insurance for their professional services. The Chair said he would report back on the question at the November meeting.

The meeting adjourned at 11:42 AM. The next meeting of the Technical Panel will be held on November 16.

Action Item Summary

Date	Action	Status	Comments
July 27, 2021	Vote to recommend Market Rule Amendment Proposal MR-00449 to the IESO Board moved to October meeting.	Closed	Adopted by the IESO Board of Directors and is currently planned to take effect on December 1, 2021.
March 23, 2021	In relation to MR-0448-R00 market rule amendments, the IESO will periodically review the availability of error and omissions insurance for negligence.	Open	Update to be provided during November 2021 TP meeting.
October 5, 2021	In relation to MR-00468 – Intertie Scheduling Limit, specify if the proposed amendments refer back to the appendix rather than the equation governing intertie limits.	Open	Update to be provided after the stakeholder engagement process.