



February 4, 2022

Submitted electronically to: [engagement@ieso.ca](mailto:engagement@ieso.ca)

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### **Subject: Market Renewal Batch 2: Market Power Mitigation**

Evolugen by Brookfield Renewable generally supports the comments filed by Ontario Power Generation dated February 3, 2022 with reference to Market Renewal Batch 2: Market Power Mitigation.

In particular, we wish to highlight that:

- The Technical Panel should actively review the Market Manuals in conjunction with the Rules to ensure consistency.
- 22.5.1 and 22.5.1.7
  - o Requesting generators to update reference level data every two years or earlier at the decision of the IESO might not be feasible given our experience compiling such data during the engagement process. We recommend an update every five years, given that much of the historical data requested by the IESO cover a five-year period.
- 22.8.10
  - o With reference to "[t]he IESO may not apply a settlement charge for subsequent reviews conducted as a result of the IESO rejecting a finding" We recommend changing "may not" to "shall not" to avoid generators being repeatedly liable for such review fees until the IESO approves the new reference levels.

- 22.10.2.1
  - o With reference to how a “narrow constrained area” would be designated. Under the proposal, a region in which one single interval (i.e., 8% of the hour) was import-constrained for 4% of the hours in the previous 365 days would be deemed a narrow-constrained area, despite the fact that this region was constrained only 0.3% of the time. We recommend the IESO reconsider this criterion.
- 22.15.8
  - o With reference to “[t]he IESO shall calculate a resource’s simulated as-offered energy locational marginal price using the same inputs as those used by the relevant calculation engine to calculate that resource’s energy locational marginal price.” We request more openness and transparency on how this mechanism would be calculated due to the significant financial impacts it poses.
- 22.15.10
  - o With reference to “[t]he IESO may test an offer for operating reserve of a registered market participant for a resource for physical withholding of operating reserve if the resource...” Please clarify if these conduct tests would be applied to each of the three operating reserve markets.
- 22.15.10.3
  - o With reference to “the offer for operating reserve was below the resource’s reference quantity value and the operating reserve locational marginal price for the resource exceeded \$15/MW...” Please clarify whether generators are expected to submit OR-related reference level costs.

Thank you,  
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