
From: David Butters
Date: February 3, 2022 at 8:22:58 PM EST
To: Jessica Savage
Subject: TP and MRP

Dear Jessica,

At today's APPrO Market Affairs WG Meeting, members noted concerns regarding the due date for comments arising from the January TP meeting at which it was agreed to post the Market Power Mitigation batch for provisional recommendation.

While we understand the need to keep all parties moving forward on the path to a November 2023 in-service date for MRP, we do want to be as helpful as possible to ensure the fewest hiccups along the way.

We respectfully request that the due date be extended for two weeks following the Feb TP meeting. I note that the IESO's plans to review examples demonstrating the application of the proposed MPM amendments at the Feb TP meeting. Stakeholders, like the TP, require the benefit of examples, and shouldn't be deprived of the benefit of this meeting prior to developing comments.

APPrO members also have serious concerns about the level of detail being requested for workbooks. It is frequently unclear why this information is needed, how it will be used, or in some case there is not a readily available answer or one which might depend on a number of other variables, or, some types of information may simply be non-existent. I am sure individual generators have made these points, but I submit that there is an elevated need to address this when it becomes apparent it is more than just a few generators. APPrO has touched in these concerns as far back as 2020.

This is made more serious by the IESO's proposed means for dealing with disputes with respect to reference levels and information requests as they are being proposed within the market rules.

I look forward to the IESO's response.

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