

Minutes of the IESO Technical Panel Meeting

Meeting date: October 7, 2025
Meeting time: 9:00 a.m. - 10:14 a.m.
Meeting location: Virtual

Chair/Sponsor: Michael Lyle

Scribe: Trisha Hickson, IESO

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

Invitees	Representing	Attendance Status Attended, Regrets
Jason Chee-Aloy	Renewable Generators	Regrets
Rob Coulbeck	Importers/Exporters	Attended
Dave Forsyth	Market Participant Consumers	Attended
Jennifer Jayapalan	Energy Storage	Attended
Forrest Pengra	Residential Consumers	Attended
Robert Reinmuller	Transmitters	Attended
Vlad Urukov	Market Participant Generators	Attended
Michael Pohlod	Demand Response	Attended
Matthew China	Energy Related Businesses and Service	Regrets
David Short	IESO	Attended
Michael Lyle	Chair	Attended
Secretariat		
Trisha Hickson	IESO	Regrets



IESO Presenters/Attendees

Presenters:

Darren Byers

Jo Chung

Laura Zubych

James Hunter

Agenda Item 1: Introduction and Administration

Trisha Hickson, IESO, welcomed everyone joining the meeting.

The meeting agenda was approved on a motion by Dave Forsyth.

The September 9, 2025, meeting minutes were approved on a motion by Forrest Pengra.

Introductory Remarks from the Chair:

Michael Lyle, Chair noted that the annual joint meeting between the IESO Board of Directors Markets Committee and the Technical Panel is scheduled for December 8th. More details about the timing will be shared soon. The November 11th Technical Panel meeting will include an item inviting input on topics to discuss with the Markets Committee. Mr. Lyle then noted that there is a call for nominations to fill several vacant seats on the Technical Panel. Looking ahead, although the Market Renewal Program has concluded, a busy 2026 is anticipated, and a preview of upcoming activities will be shared in November. Lastly, Mr. Lyle indicated that the IESO is changing the schedule for its proposal to amend market rules that require the IESO Board to establish certain technical market parameters, which was originally planned to come to this Technical Panel meeting today for a vote to post. Following stakeholder feedback from a recent engagement session, including written comments following it, the IESO believes that additional education sessions are needed to better explain the impacted parameters and the reasons for the proposal. We expect to bring an amendment proposal to the Technical Panel in Q1 of 2026, after we have had more opportunity to engage and receive additional feedback on the proposed approach.

Agenda Item 2: Engagement Update

Ms. Hickson provided an update on the prospective schedule which is posted on the Technical Panel webpage and identified upcoming sessions as part of the IESO October Engagement Days and encouraged panel members and observers to attend.

Agenda Item 3: Capacity Auction Tie-Break Methodology

Jo Chung, IESO noted that the IESO is seeking a Technical Panel vote to recommend the proposed rule amendments for IESO Board approval. Following the Panel's vote to post at the September 9th meeting, no further comments were received from stakeholders. Since the September 9th Technical Panel's review, a few minor edits have been made to the market rules language in response to comments received from Vlad Urukov, OPG to enhance clarity and consistency of language. Two other panel members also requested an example of a scenario where multiple constraints are being violated simultaneously. Laura Zubyc, IESO provided an overview of the example to the panel.

Associated [materials](#) can be found on the Technical Panel webpage.

Vlad Urukov asked if the three examples of constraints mentioned is an exhaustive list of the types that could be considered?

- Ms. Zubyc noted that in addition to the intertie limit, other constraints that may be factored in include the global import limit, zonal limit, and potentially the auction limit, specifically when the demand curve is reached. These four constraints are the primary ones that could be involved in a tie-breaking scenario.

Mr. Urukov asked that when referring to the "lower" or "lowest" constraint, is this in relation to the number of megawatts defined or limited by the constraint?

- Ms. Zubyc noted that yes, the example refers to the constraint with the lower available capacity in terms of megawatts.

Mr. Urukov asked if additional generators are added, resulting in a total of five, and the zonal limit remains at 150 MW, would each offer be apportioned 30 MW? In this case, would it still be necessary to prioritize the intertie constraint and allocate 40 MW to the imports first? Mr. Urukov added for example this scenario assumes the addition of generators A, B, C, D, E, and F, with the total zonal capacity remaining at 150 MW. The equal apportionment would result in 30 MW per offer, including imports. Would the intertie constraint still need to be addressed first?

- Ms. Zubyc noted that no, if the intertie limit is respected under the equal split, then no further adjustment is required. The intertie constraint only needs to be prioritized if it is violated during the allocation process. If all constraints are respected, the allocation proceeds based on the zonal limit.

Mr. Urukov asked if the lowest constraint is not always applied first in terms of total capacity?

- Mr. Zubych noted that this is correct. The lowest constraint is only prioritized when it is at risk of being violated. If all constraints are respected, there is no need to apply the lowest constraint first.

Mr. Urukov acknowledged the answer.

On a motion moved by Michael Pohlod, the Technical Panel voted to recommend for IESO Board approval the market rule amendments associated with the Capacity Auction tie-break methodology. Mr. Lyle noted that voting rationale should be sent to the IESO by October 9, 2025.

Agenda Item 4: Post Go-Live True-Ups for the Renewed Market

Darren Byers, IESO noted the IESO is seeking a Technical Panel vote to recommend the proposed rule amendments for IESO Board approval. Following the Panel's vote to post at the September 9th meeting, no further comments were received from stakeholders. Mr. Byers noted that Mr. Urukov provided three comments; two were administrative in nature where the proposals were updated accordingly. The third was related to "energy ramp hour reference levels" in the Market Power Mitigation rules with respect to another non-financial dispatch data parameter, and Mr. Urukov had asked whether there was a logic issue similar to the maximum number of starts per day. Mr. Byers noted that the IESO is reviewing and will report back to the Technical Panel at a future date.¹

Mr. Urukov commented that in the cover memo, the third issue he raised was referred to as an issue with the interaction between default reference levels and the validation of dispatch data. However, Mr. Urukov noted that upon his further review, he believes the issue is not limited to default reference levels and instead exists with the validation rules related to the energy per ramp hour reference level value.

Associated [materials](#) can be found on the Technical Panel webpage.

On a motion moved by David Short, the Technical Panel voted to recommend for IESO Board approval the market rule amendments associated with the Post Go-Live True Ups for the Renewed Market.

Agenda Item 5: Market Manuals - Overview of Process with Technical Panel

James Hunter, IESO noted that this overview is to update members of the Technical Panel on the conditions under which the Panel may review amendments to market manuals. This discussion is part of a broader, ongoing dialogue regarding the relationship between market rules and market manuals, including how decisions are made about where content should reside and how stakeholder engagement is conducted for each document type.

Associated [materials](#) can be found on the Technical Panel webpage.

Mr. Urukov asked to revisit the distinction between market rules and market manuals and if the IESO could speak to the potential impact on market participants. Mr. Urukov added that while market rules

are generally understood to carry greater significance, are there circumstances where changes to market manuals could also have a material impact?

- Mr. Hunter noted that yes, there are different dimensions to consider. In principle, changes to market manuals are typically less impactful than changes to market rules. Market rules establish the foundational requirements, while manuals provide procedural details. In straightforward cases such as reporting formats or data entry methods manual changes may not materially affect participants, provided the changes are clearly communicated. However, manuals may also contain specific values or calculations that influence participant outcomes. Mr. Hunter added that while these changes may not introduce new obligations, they can affect participant economics. Therefore, even within manuals, some changes may be more significant than others.

Mr. Urukov acknowledged the distinction and added that he would like to emphasize that in certain cases, changes to market manuals can be significant, particularly for specific participant groups. For example, adjustments to timelines or values could materially affect operations or financial outcomes. While these cases may be limited, it is important to recognize that not all manual changes are minor or inconsequential.

- Mr. Hunter acknowledged the observation and noted that it aligns with the more complex cases we have discussed. When determining whether a change should be reflected in a market rule or a manual, the IESO assesses the potential impact. Some manual changes are purely technical and have no participant impact, while others may be more substantial. If a proposed manual change is deemed sufficiently impactful, it may be escalated to a rule change. Alternatively, if it remains a manual change but is considered significant, this informs our stakeholder engagement strategy. While the standard process for manual changes involves a seven-day publication period, engagement on more complex or impactful changes may be more extensive and occur in advance of us triggering the seven-day publication required for the IESO baseline. A recent example is Market Manual 14.2, which outlines reference level values for the Market Power Mitigation Framework under MRP. Mr. Hunter noted that engagement on this manual spanned several years due to its technical complexity and participant relevance. This underscores the importance of assessing impact, regardless as to whether the change is in a rule or a manual, and tailoring engagement accordingly.

Michael Pohlod asked if prior disputes factor into the IESO's assessment at all.

- Mr. Hunter noted the IESO considers multiple factors when determining the appropriate engagement strategy for proposed changes, including potential future disputes, input from legal counsel, subject matter experts, and the experience of the Market Rules team. The goal is to assess the materiality and perceived impact of a change, whether to a market rule or manual and determine the level of engagement required before formal implementation. While efforts are made to anticipate stakeholder concerns, there are instances where initial assessments may underestimate the perceived impact. In such cases, feedback from stakeholders or the Technical Panel may prompt adjustments to the engagement approach. It

is acknowledged that some changes, though administrative in nature, may have unforeseen material business impacts on specific participant groups. This feedback is taken seriously and may influence both the engagement strategy and the decision as to whether a change should be reflected in a rule or manual. Mr. Hunter noted that the engagement process is therefore flexible and responsive, ranging from minimal engagement for minor changes to extended consultation for complex or impactful ones.

Mr. Pohlod emphasized the importance of ensuring that stakeholder engagement is not bypassed in cases where a market participant has previously contested a rule. He noted that if the IESO characterizes a change as a clarification within the market rules process, it must still consider whether the disagreement pertains to the rule's expression itself. In such cases, a more extensive engagement may be warranted. Mr. Pohlod further noted that, at minimum, the seven-day publication period provides an opportunity for stakeholders to request a full engagement process if they believe the change is substantive.

- Mr. Hunter noted this was correct.

Mr. Urukov referenced a presentation issued by the IESO on February 4, 2020, which is cited later in the slide deck. In addition to the definitions presented, the IESO also outlined the accountability for approving changes. As is widely understood, the IESO Board of Directors holds the authority to approve market rules. However, the presentation clarifies that the Board has delegated the approval of market manuals to IESO management. Mr. Urukov emphasized that this represents a different process, where the authority to proceed lies with IESO management. He then raised a second point, noting that discussions around market manual changes have so far treated them as a single process—namely, the baseline process. Mr. Urukov noted that in his experience, some of the more complex issues relate to the Interim Market Document Change (IMDC) process, which is a sub-process of the baseline. He noted that the IMDC process is subject to very tight timelines, with the IESO able to post changes for as little as five days and implement them as soon as three business days after the review period. Additionally, the IESO responds directly to participants during this process. This approach is outlined in the Quick Take and Market Manual 2.13. Mr. Urukov highlighted that these condensed timelines can create challenges for participants, who may not have sufficient time to review and respond. Furthermore, if the IESO disagrees with a participant's concern, particularly if the participant believes the change warrants broader engagement the IESO may proceed regardless. Mr. Urukov expressed concern that the recourse in such situations is unclear and requested further clarification on how such cases are managed.

- Mr. Hunter acknowledged the concern regarding the expedited nature of the market manual process. He noted that while the baseline process is already expedited, it includes an advance stakeholder engagement component, which may vary in duration. He explained that the Interim Market Document Change (IMDC) process is triggered in situations where there is insufficient time for extended engagement, functioning as the market manual equivalent of an urgent rule amendment. Mr. Hunter stated that the IMDC is typically initiated when a significant unintended effect or outcome is identified in the current drafting of the manuals, requiring immediate corrective action. Alternatively, external factors, such as a change in law or a new NERC requirement may necessitate rapid implementation. Although rare, these

scenarios demand swift response. He acknowledged the concern raised by Mr. Urukov regarding the limited time stakeholders must review and provide feedback under the IMDC process. Mr. Hunter agreed that there is a need to clarify the recourse available to stakeholders' following implementation and committed to providing further details on this point. He emphasized that one of the advantages of market manuals is their flexibility and responsiveness. While there is a defined window for posting and comment submission prior to implementation, stakeholders retain the ability to provide feedback after a change has taken effect. If the IESO determines that the implemented fix was suboptimal based on stakeholder input, it can be revised through the baseline process. Mr. Hunter noted that disagreements may still arise between the IESO and individual stakeholders regarding the merits of a change. However, this is not unique to the IMDC process and applies equally to market manual and market rule changes. Mr. Hunter reiterated that expedited implementation does not preclude future revisions and that stakeholder feedback remains an important part of the process.

Mr. Urukov referred to section 1.4 of Market Manual 2.13, which addresses Market Document Baseline Management. The manual states that if a market participant disagrees with a market manual change, it may trigger the market rule amendment process through the Technical Panel. Mr. Urukov noted that this appears to be a right granted within the manual itself, rather than in the market rules, which raises questions about how such a right could be exercised in practice. He noted the potential contradiction that if the IESO does not accept a participant's objection and proceeds with the change, it is unclear how the participant could initiate a market rule amendment when the issue originates from the manual and is not tied to an existing rule. Mr. Urukov requested further clarification on how such a process would work.

- Mr. Hunter acknowledged that the provision requires clarification and reconsideration. He noted that there is a logical scenario in which a stakeholder could propose a market rule amendment that would override a market manual. In such cases, if the stakeholder agrees the content belongs in the manual but disagrees with its substance, continued engagement with the IESO is the appropriate course of action. He acknowledged that in some instances, the IESO and a participant may be at odds, with the participant advocating for a position that may not align with broader market interests. In such cases, the IESO must make a balanced decision. Mr. Hunter emphasized that the IESO will consider stakeholder input in good faith and, where appropriate, make changes if valid concerns are raised. He stated that while a market rule amendment is logically possible, it is not the preferred solution for issues that should be addressed at the manual level. The IESO is actively reviewing the amendment process in Chapter 3 of the market rules and will continue refining its approach to market manuals. Mr. Hunter further explained that the IESO has been working since 2018 with the Technical Panel and the Market Development Advisory Group to establish guidelines for drafting market rules. These guidelines were published in February 2020 and are restated in the current presentation, along with complementary drafting principles for market manuals. He described a shift in approach under the Market Renewal Program (MRP), where rules and manuals were drafted together by integrated teams including market rule drafters, legal counsel, and subject matter experts to ensure consistency and clarity. This collaborative drafting process allowed for better alignment between documents and more informed decisions about whether changes should be reflected in rules or manuals. Mr. Hunter noted

that this approach also enabled the IESO to design tailored stakeholder engagement strategies based on the nature and impact of proposed changes. He confirmed that this integrated drafting and engagement model has now been adopted for all market rule and manual changes. The newly named Market Rules and Manuals Group oversees all such changes and coordinates internal teams accordingly. He emphasized two key decisions in the drafting process: determining whether a change belongs in a rule or manual and designing the appropriate engagement plan. This enhanced approach is intended to significantly reduce the risk of stakeholders encountering unexpected changes late in the process, such as during the final day of a baseline posting. Mr. Hunter clarified that while disagreements may still occur, this is not a flaw in the process but a natural feature. There is no perfect algorithm for assigning content or designing engagement plans; judgment and dialogue are essential. Mr. Hunter stated that the new approach, combined with the IESO's responsiveness and willingness to revisit decisions, provides a strong foundation for addressing stakeholder concerns and improving transparency.

Mr. Urukov expressed appreciation to the IESO for the steps taken to improve decision-making regarding where changes should be reflected whether in market rules or manuals and noted that this approach will likely enhance transparency and visibility. He encouraged the IESO not to stop short of full resolution, acknowledging that while the new process may address most issues, it cannot guarantee that all concerns will be resolved. There will inevitably be cases where individual participants or groups disagree with the IESO's assessment of a specific change. Mr. Urukov suggested the IESO continue refining its approach to address the remaining subset of cases estimated at approximately 5% where disagreement persists, particularly when the issue relates strictly to a market manual change. He emphasized the importance of clearly defining the recourse available to participants in such situations. Mr. Urukov posed a question regarding the current updates to market manuals, specifically those outlining the baseline process. He asked whether such updates would be brought to the Technical Panel for review, even in the absence of an associated market rule change.

- Mr. Hunter noted that the IESO is revisiting the market rule content related to both rule and manual changes. He reiterated that, as with all other changes, the IESO is reviewing rules and manuals together to ensure alignment and consistency across documents. This includes peripheral documents such as the Design Basis (DB) Terms of Reference, which contain relevant process descriptions. He acknowledged that this work is still in progress and that the IESO is conducting an internal assessment.² While specific amendments to rule content are anticipated, the IESO is not yet able to confirm the exact nature of those changes. Mr. Hunter noted that some updates may be presented to the Technical Panel as rule amendments, while others may be reflected in manual content, depending on the outcome of the review. Mr. Hunter confirmed that the IESO will report back to the Technical Panel once the assessment is complete and further clarity is available.

Other Business

No other business was brought forward.

Adjournment

The meeting adjourned at 10:14 a.m.

The next regular TP meeting will be held on November 11, 2025.

Action Item Summary

Date	Action	Status	Comments
Oct. 7	<p>¹ The IESO to report back to the panel regarding Mr. Urukov's comment related to energy ramp hour reference levels in the Market Power Mitigation rules.</p> <p>² The IESO to report back to the Technical Panel once the assessment is complete and future clarity is available and that is in relation to possible changes to enhance the market manual amendment process.</p>		