IESO Market and Planning Data Engagement—March 21, 2024

Feedback Provided by: April 4, 2024

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Date: April 5, 2024

Following the March 21, 2024 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the engagement web page.

Please submit feedback to <u>engagement@ieso.ca</u> by **April 4, 2024**. If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.



Торіс	Feedback
Do you have any further feedback to share regarding the availability of IESO's Market and Planning Data?	Evolugen by Brookfield Renewable appreciates the opportunity to provide comments.
	We wish to reiterate our request for the IESO to release information regarding the Clean Energy Credit registry as its administrator. For the registry to attract buyers and sellers, information to promote its transparency, such as transaction volume, technology type, vintage, and price, would be very appreciated. Similar to information released for the IESO's capacity auctions, such information can be general and agglomerated without revealing the sensitive and commercial information of individual participants.
	With regards to the IESO's capacity auctions, we note that while the IESO publishes technology type information post-clearing (e.g., how many MWs of internal HDR or external gas cleared the auction), this information is not available for pre-clearing offers (e.g., how many MWs by technology type were entered in the auction). This information can be anonymized and agglomerated without revealing sensitive and commercial information of individual participants, and would greatly help participants prepare their offers for subsequent auctions.
	Finally, we recognize that the HONI and general transmission related information we requested may not fall under the IESO's purview, and that the LT2-RFP in particular has promised that such information may be made available in the future, but they are critical for proponents of the IESO's various RFPs, so any information the IESO or HONI could publish, on an ongoing and not one-off basis, would be very appreciated.
Торіс	Feedback
If there are specific data availability issues you believe have not been addressed, could you please provide detailed feedback on what you feel is	Please see our general comments below.

missing?

General Comments/Feedback

With regards to data confidentiality, the March 21 presentation made multiple references to the treatment of confidential and/or commercially sensitive data. In particular, the IESO noted on slide 8 that "The IESO holds data that may be commercially sensitive or is currently categorized as confidential for physical and/or cybersecurity reasons. In general, this information will not be published." And yet, a separate market rule amendment related to Market Rules Chapter 3 seeks to grant the Market Assessment and Compliance Division (MACD) the ability to disclose confidential information to market participants and non-market participants alike, without the obligation to provide notice either before or after an investigation. While we appreciate the complex relationship between the OEB, the Market Surveillance Panel, MACD, and the Market Assessment Unit, we note that the IESO's engagement website clearly identifies MACD as an organization of the IESO, and the consultation is conducted by IESO staff:

These two IESO engagements appear to be inconsistent in their intended treatment of confidential and/or commercially sensitive information. Please provide clarity on how the IESO intends to protect confidential and/or commercially sensitive information in a comprehensive and organization-wide manner.