

Feedback Form

Amendments to Market Manual Part 2.2 Exemption Application and Assessment – September 17, 2024

Feedback Provided by:

Name: Tammy Wong

Title: Senior Markets Specialist

Organization: Ontario Power Generation

Email: [REDACTED]

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Following the Market Manual 2.2 Exemption Applications and Assessment, September 17, 2024 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the [engagement](#) webpage.

To promote transparency, feedback submitted will be posted on the Market Manual 2.2 Exemption Application and Assessment page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark "Yes" below:

- ☐ Yes – there is confidential information, do not post
- ☒ No – comfortable to publish to the IESO webpage

Please submit feedback to engagement@ieso.ca by October 8, 2024.

OPG thanks the IESO for the opportunity to provide feedback on the MM2.2 Exemptions engagement and for extending the due date to **October 24, 2024**. We look forward to receiving the IESO's response, and to future engagement opportunities.

Market Manual changes relating to the new amendment process

Topic	Feedback
Do you have any comments regarding the new amendment process?	<p>Timelines of Market Rule Exemptions: With previous exemptions applications, the approval process was protracted beyond specified timelines, significantly delaying implementation. OPG kindly requests that efforts be made to streamline and expedite the exemption process as part of this amendment. Timely resolution and approval of exemptions are crucial to ensuring efficient market operations and minimize disruptions for market participants.</p> <p>Newly Added S.4.2 Amendment of Exemptions: It is beneficial to have a more flexible and simplified process to amend an existing exemption if changes are not material.</p>
Is the new amendment process set out in a clear manner?	The new amendment process is set out in a clear manner.
Is there anything missing from within the new amendment process?	<p>Forms: The redlined MM2.2 Appendix A only has one form remaining (IMO-FORM-1413), and the other three forms have been crossed out. However, page 23, S.4.4 Transfer of an Exemption cites <i>Transfer Exemption Form 1603</i>, which has been deleted. Can the IESO please explain the rationale for only one form remaining? Does the single form incorporate the other three forms and provide improved efficiency, or is this an error?</p> <p>Third Party Notification for Amendments: The redlined MM2.2 Page 28/46, S4.2 Amendment of an Exemption of states "The exemption applicant and any third parties that made written submissions will be notified of the decision of the panel". Consider providing clarity that this only applies to third parties that made written submissions in the amendment process, not in the original exemption application to limit notification only to relevant stakeholders for efficiency.</p>

Reorganization of the Market Manual

Topic	Feedback
Do you have any comments about the reorganization of the market manual sections?	
Has the new structure made the market rule exemption process easier to understand and follow?	

General Comments/Feedback

OPG's specific concerns are as follows:

Clarification on the Impact of Changes to MM 2.2: We would like clarification regarding the impact of the changes introduced to MM 2.2 on existing/active exemptions. During the engagement, the IESO mentioned that it is the responsibility of the Market Participant to review their existing exemptions and ensure they align with the renewed market. However, it would be helpful to have a clear understanding of how these changes will affect the validity and eligibility of existing exemptions. In addition, it is important to note that our existing exemptions have already undergone the approval process with the IESO Board and have well-defined expiration terms and conditions. For instance, some exemptions may be valid for the lifetime of the equipment. These exemptions have been established based on the understanding that they would remain unaffected by any changes introduced by the MRP. It is worth noting that the presentation materials indicated that the changes to MM 2.2 are intended to introduce a new process to only amend existing exemptions. Can the IESO confirm that if a participant has existing exemptions for the duration of the lifetime of the equipment that there will be no impact, and they will continue through to the renewed market.

Ambiguity on Responsibilities: On slide 11, the fourth bullet of the engagement session, there is ambiguity regarding the responsibility for ensuring that existing exemptions align with the MRP. It seems unusual that the burden of knowing how exemptions are affected by all Rule and Manual changes introduced by the MRP falls primarily on the Market Participant, rather than the IESO who are in a better position than MP. While OPG is endeavouring to review all our exemptions in preparation for the renewed market, it is recommended that the IESO more actively work with MPs to ensure common understanding of Market Rules and that all exemptions are current. As an example, we may have exemptions that need to be revised to reflect updated market rules exemptions for facilities we no longer own nor operate.

Clarity on the Exemptions Website: The website on which the IESO publishes exemptions should be more user-friendly. Most entries do not state the Market Participant nor the facility. Retrieving and reviewing the information are very onerous as a result. It is recommended that the IESO website be made more user-friendly: identify the Market Participant and specific facility to which the exemption applies.