

Feedback Form

Intertie Offer Guarantee (IOG) - Adjustments to Payment Conditions

Feedback Provided by:

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Email:

Date: September 9, 2026

To promote transparency, feedback submitted will be posted on the IOG engagement page unless otherwise requested by the sender.

- ☐ **NO - There is confidential information, do not post**
☒ **YES - Comfortable to publish to the IESO web page**

Following the August 18th IOG – Adjustments to Payment Conditions 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.

Note: The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials, please indicate if they are confidential.

Please submit feedback to engagement@ieso.ca by September 4, 2026.



AMPCO Submission – IESO Intertie Offer Guarantee Consultation

Submitted by Brad Duguid, President, AMPCO

September 9, 2026

AMPCO commends the IESO for its thorough review of the Intertie Offer Guarantee (IOG) and for responding to the Market Surveillance Panel's recommendations. The proposed shift to a conditional IOG, where eligibility is tied to system adequacy needs (such as the declaration of a Conservative or Emergency Operating State or issuance of an Energy Emergency Alert), is a prudent and balanced approach. This change better targets compensation to circumstances where imports directly support Ontario's reliability, aligning compensation more closely with actual system needs and reducing unnecessary costs.

The IESO clearly demonstrates that under the current IOG, payments are sometimes made even when there is no adequacy need, which does not serve the intended purpose of the IOG. By making IOG payments conditional, the IESO is reinforcing the principle that imports should be supported when they provide tangible reliability and adequacy benefits. This approach strengthens market efficiency and ensures that incentives are properly aligned. For large industrial consumers facing significant electricity cost pressures, ensuring that market mechanisms provide reliability benefits at the lowest reasonable cost is particularly important.

AMPCO also supports the proposal to make import transactions eligible for Real-Time Energy Lost Cost Make-Whole Payments (MWP) under the same conditions as other market participants. This change promotes fairness and transparency, ensuring consistent compensation across all resources. The examples provided in the presentation illustrate how this adjustment will work in practice and how it will ensure that importers are compensated appropriately when manual out-of-market actions are taken for reliability.

Association of Major Power Consumers in Ontario



Website: www.ampco.org



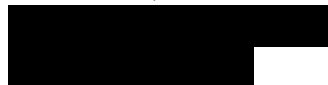
The proposed update to the intertie congestion methodology is a logical complement to the conditional IOG. By allowing imports to capture the upside of real-time locational marginal prices (LMP) when ineligible for IOG, the proposed methodology should provide more balanced risk-reward incentives and clearer real-time price signals.

AMPCO appreciates the IESO's commitment to transparency and stakeholder engagement throughout this process. The clear timeline for feedback, technical panel review, and implementation provides stakeholders with ample opportunity to participate and prepare for the changes. The detailed examples and rationale in the presentation help market participants understand the impacts and benefits of the proposed adjustments.

Overall, AMPCO supports the IESO's proposed adjustments to the IOG and related market mechanisms. These changes will enhance reliability, improve market efficiency, and ensure fair and targeted compensation for imports. We encourage the IESO to proceed with the proposed amendments and to monitor the impacts of these changes on import participation, market prices and system costs following implementation, addressing any unintended consequences that may emerge. We look forward to continued engagement as the implementation progresses.

Sincerely,

Hon. Brad Duguid, ECO
President, AMPCO



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