

Feedback Form

Adjustments to Real-Time (RT) Make-Whole Payments (MWP)

Meeting Date: November 21, 2025

Feedback Provided by:

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Date: December 1, 2025

Following the **November 21, 2025**, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback on the items discussed during the webinar. The presentation and recording can be accessed from the engagement web page.

Please submit feedback to engagement@ieso.ca by December 1, 2025. If you wish to provide confidential feedback, please submit it as a separate document, marked "**Confidential**." Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Adjustments to RT MWP Session

Topic	Feedback
<i>November 21 Presentation Material:</i> Do participants have any general feedback on the presentation or background information presented?	Please include illustrative scenarios to enhance Market Participants' understanding of, and transparency regarding, the impacts of these proposed changes. Additionally, we recommend considering one-on-one implementation testing with Market Participants to ensure that settlement systems can effectively and smoothly accommodate the proposed changes.

Topic	Feedback
<p><i>Item 1: Lost Opportunity Cost (LOC) and Forbidden Regions:</i></p> <p>Are there any significant concerns with the information presented regarding this item?</p>	<p>IESO presentation addressed LOC MWP and the associated adjustments required; however, it did not reference any changes to LC MWP. Since LC MWP also includes a forbidden region component in its energy calculation, could you clarify whether LC OR MWP is exempt from adjustment due to joint optimization? Additionally, could you elaborate on how the LOC OR MWP adjustment will be implemented? Specifically, will the changes be limited to updates to charge code equations, or will they also involve EOP updates via the calculation engine? In cases where a resource has multiple forbidden regions, will the OR MWP calculation consider all such regions and provide OR MWP payments only for output between those regions? For example, if a resource has forbidden regions between 0–100 MW and 150–200 MW, with a 10S EOP of 250 MW and a schedule at 255 MW, would the resource only receive OR MWP for the ranges 100–150 MW and 200–255 MW? Furthermore, the IESO presentation focused on the upper boundary of forbidden regions, but similar considerations may arise at the lower boundary. The IESO should investigate and clarify whether the proposed changes apply to the entire forbidden region, rather than being specific to the upper boundary.</p>

Topic	Feedback
<p><i>Item 2: Operating Reserve (OR) Ramping in LOC EOP Calculations:</i></p> <p>Are there any significant concerns with the information presented regarding this item?</p>	<p>Click or tap here to enter text.</p>
<p><i>Item 3: Make-Whole Payment (MWP) Not Offsetting Amongst Energy and OR Products:</i></p> <p>Are there any significant concerns with the information presented regarding this item?</p>	<p>Click or tap here to enter text.</p>

General Comments/Feedback

Please quantify the financial impact in the market from these unwarranted make-whole payments. Please break down the financial impact by the three items listed in the engagement.