

Feedback Form

Changes to the Establishment and Publication of Market Parameters – June 18, 2026

Feedback Provided by:

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Date: 30 June 2026

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

- Yes – there is confidential information, do not post**
 No – comfortable to publish to the IESO web page

Following the Changes to the Establishment and Publication of Market Parameters engagement webinar on June 18, 2026, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the Changes to the Establishment and Publication of Market Parameters 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 July 2nd, 2026.

General Comments/Feedback

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve, and restore Ontario rivers. ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

ORA writes to support the IESO's revised proposal to write four foundational market price parameters into the market rules, and to ask that the IESO close the one gap that remains, the constraint violation penalties. ORA's interest here is ratepayer protection and the transparency and accountability of the IESO's governance, both of which fall squarely within the IESO's mandate.

1. Hardcoding the four foundational parameters into the market rules is the right decision.

The original September 2025 proposal would have moved these price levers into management-set market manuals, outside any required stakeholder review or Board vote. Stakeholders, including APPrO, Brookfield Renewable, OPG, and TransAlta, opposed that change on governance grounds, advancing a principle ORA shares: "Technical expertise is not a prerequisite for effective governance, oversight, transparency and accountability are."¹ The revised proposal corrects course. Writing the maximum market clearing price (\$2,000/MWh), the maximum operating reserve price (\$2,000/MWh), the settlement floor price (-\$100/MWh), and the variable-generation and flexible-nuclear floor prices into the market rules means any future change must pass through stakeholder engagement, Technical Panel review, and a recorded IESO Board vote.² These parameters set the ceiling and the floor on what Ontario ratepayers pay in the wholesale market. A transparent, on-the-record process for changing them protects ratepayers, and ORA supports it.

ORA Recommends: That the IESO adopt the revised proposal and specify the maximum market clearing price, maximum operating reserve price, settlement floor price, and the variable-generation and flexible-nuclear floor prices in the market rules, so that any future change requires stakeholder engagement, Technical Panel review, and IESO Board approval.

2. Constraint violation penalties should follow the same governed process.

The revised proposal leaves the constraint violation penalties (CVPs) in the market manuals, set by IESO management and changed through the internal Baseline Management process, with no Technical Panel review and no IESO Board vote.² ORA sees no principled reason to treat the CVPs differently. They are price signals: they set the order in which the system operator overrides constraints, and they feed directly into the dispatch, scheduling, and settlement outcomes that ratepayers fund. If the four foundational parameters warrant the protection of the market rules, so do the CVPs. Leaving them under management control reopens, for one set of levers, the very governance gaps the revised proposal was meant to close.

ORA Recommends: That the constraint violation penalties be governed in the same way as the four foundational parameters, through the market rule amendment process with Technical Panel review and IESO Board approval. If the IESO maintains that operational timing requires the CVPs to remain in the market manuals, each CVP change should be published with a written rationale and a stakeholder comment opportunity before it takes effect.

3. Governance changes of this kind require visible independence safeguards.

ORA places one further matter on the record. On May 5, 2026, ORA wrote to the IESO about the institutional independence of its Board, noting that the current Board Chair, Mr. Ken Hartwick, previously served as President and Chief Executive Officer of Ontario Power Generation.³ Decisions about who controls Ontario's market price levers go to the heart of the IESO's independence and public credibility. When the IESO concentrates or relocates authority over market parameters, ratepayers and stakeholders are entitled to know that those decisions are insulated from any real or perceived conflict of interest.⁴

ORA's concern is heightened by the growing influence of directives from the Minister of Energy and Mines over IESO preferences that are backed by data or studies. The April 16, 2026, Ministerial Directive instructed the IESO to procure new long lead-time hydroelectric generation, even as the Directive acknowledged that these resources are “deemed not well-suited to competing against resources with shorter development timelines and lifespans (e.g., wind, solar and inverter-based battery energy storage systems).”⁵ That instruction overrode the IESO's own August 2025 Hybrid Resource Equivalency Assessment, which found that wind, solar, and battery energy storage systems (BESS) could serve 99.5 to 99.98 percent of load in the Peaky Need Scenario.⁶ When political direction can displace the IESO's own expert analysis, on-the-record, Board-governed control of market parameters is not a formality. It is the safeguard that keeps ratepayer-facing decisions independent, accountable, and aligned with the public interest rather than a shifting political agenda.

ORA Recommends: That the IESO publicly disclose the recusal and conflict-of-interest protocols that apply to the Board Chair and Board members in decisions over market-parameter governance, so that stakeholders can be confident these decisions are made independently and on the record.

ORA Recommends: That the IESO record on the public record any instance where a ministerial directive departs from the IESO's own technical analysis, together with the IESO's assessment of the ratepayer and reliability implications, so that the public can see where political direction has displaced the evidence.

Transparency is only meaningful if it covers every lever. ORA supports putting the four foundational parameters where stakeholders and the public can see them and urges the IESO to finish the job by bringing the constraint violation penalties into the same open process rather than leaving them in the dark.

Thank you for this opportunity to comment.

Respectfully

submitted,

Linda Heron
Chair, Ontario Rivers Alliance

End Notes

1. *Independent Electricity System Operator. Response to Stakeholder Feedback, Changes to the Establishment and Publication of Market Parameters (MR-00489-R00). June 5, 2026. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/change-governance/IESO-Response-Memo.pdf>*
2. *Independent Electricity System Operator. Changes to the Establishment and Publication of Market Parameters, stakeholder engagement presentation. June 18, 2026. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/engage/change-governance/June18-2026-Changes-Establishment-Pubn-Mkt-Parameters.pdf>*
3. *Ontario Rivers Alliance. Feedback on the 2026 Annual Planning Outlook. May 5, 2026. <https://www.ontarioriversalliance.ca/ieso-2026-annual-planning-outlook-feedback-april-21-2026/>*
4. *Independent Electricity System Operator. Ken Hartwick Appointed and Named Chair to IESO's Board. November 13, 2025. <https://www.ieso.ca/en/Sector-Participants/IESO-News/2025/11/Ken-Hartwick-Appointed-and-Named-Chair-to-IESOs-Board>*
5. *Lecce, S. (Minister of Energy and Mines, Ontario). Ministerial Directive to the IESO re: Long Lead-Time RFP. April 16, 2026. <https://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/ministerial-directives/Directive-from-the-Minister-of-Energy-and-Mines-20260416-LLT-RFP.pdf>*
6. *Independent Electricity System Operator. Hybrid Resource Equivalency Assessment. August 2025. <https://ieso.ca/-/media/Files/IESO/Document-Library/Technical-papers/Hybrid-Resource-Equivalency-Assessment.pdf>*