

Feedback Form

Market Rule Improvements and Change to Governance of Approval of Market Parameters – September 16, 2025

Feedback Provided by:

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Date: October 6, 2025

To promote transparency, feedback submitted will be posted on the Post Go-Live True-Ups for the Renewed Market 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 Market Rule Improvements and Change to Governance of Approval of Market Parameters September 16, 2025 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 web page](#).

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 23, 2025.

MR-00489-R00: Change to Governance for Approval of Market Parameters

What feedback do you have on the proposed amendments related to the governance for approval of market parameters?

General Comments/Feedback

In its September 16 Webinar, it was suggested by the IESO that the IESO Board does not have the technical capabilities to directly set certain technical parameters used in the calculation engines. These parameters include the maximum market clearing price (MMCP), the maximum operating reserve price (MORP), the penalty functions for the violation of dispatch algorithm constraints (i.e. constraint violation penalties), and floor prices for energy offers from variable generators and flexible nuclear.

In APPrO's submission, the IESO Board is not required to have the technical capabilities to directly set such parameters. That is not the point that is at issue. Rather the question is "Should the IESO Board have, and maintain, the oversight and governance to approve such technical parameters?"

The answer to that question is undoubtedly "Yes". APPrO does not support the IESO's proposed change to governance of approval of the market parameters of the dispatch algorithm.

The IESO's suggestion that its stakeholder input process should be sufficient to ensure acceptable values are achieved should be rejected. A stakeholder input process is not a reasonable replacement for good governance. Stakeholder input is just that – it is input. In a situation where that input may oppose the IESO's position, there are no guarantees that such input will not be discounted if appropriate oversight and governance is removed. By granting itself the authority to approve its own recommendations, the IESO would be removing necessary governance which currently ensures that input is appropriately considered.

Further, APPrO is unaware of any evidence that the existing governance structure results in excessive effort or cost, or that it has somehow creates untimely or poor decisions. The suggested change appears to exclusively serve an objective of convenience which is inappropriately prioritized over good governance.

In closing, APPrO does not support the IESO's proposal and suggests that its Board should reject any proposal that undermines the existing governance of approval of market parameters. APPrO appreciates the opportunity to provide such a filing and apologizes for the late nature of this submission.

Note – APPrO has reviewed the filings of both TransAlta and Brookfield Renewable in this matter (both of which have informed this submission) and supports them in their entirety.