Enforcement Modernization:
Revised Stakeholder Engagement Schedule
Summary of Changes – Phase 1

Introducing a Phased Approach to Stakeholder Engagement

In May 2026, the Market Assessment and Compliance Division of the IESO (MACD) held a public stakeholder engagement session that provided an overview of a design document released in April 2026 that contained nine design proposals.

MACD is proposing a phased stakeholder engagement approach to the release of the market rules associated with each design proposal. Three separate engagement sessions are planned, each of which would review specific design proposals. This will support the development and implementation of the Market Rule amendments associated with the Enforcement Modernization design proposals. This sequencing is intended to provide stakeholders with a manageable engagement schedule, allow sufficient time for feedback to be incorporated between engagement rounds, and account for interdependencies between proposals.

While exact dates are not available for all stakeholder engagement sessions (nor associated market rule text releases), a general overview is provided, below, which remains subject to change.

Session 1 (October- November 2026): MACD has now released proposed Market Rule amendments relating to Proposals 1, 8, and 9. These amendments are summarized in the table below. MACD will host a stakeholder engagement session on November 18, 2026 to discuss these proposed amendments.

Session 2 (February-March 2027): MACD expects to release draft Market Rule amendments relating to Proposals 3, 4, and 5 in February, with a stakeholder engagement session to follow to be held in March.

Session 3 (April-May 2027): MACD expects to release draft market rule amendments relating to Proposals 2, 6 and 7 in April, followed by stakeholder engagement in May. This engagement period would also provide an opportunity to engage on any necessary refinements or "true-ups" arising from earlier engagement sessions.

Stakeholders will have an opportunity to provide comments in writing following each of the sessions.

The proposed timing and order of engagements may be adjusted based on stakeholder feedback, proposal interdependencies (including any need for true-ups), implementation considerations, and overall program priorities. However, MACD anticipates maintaining at least a three-phase stakeholder engagement.

Summary of Changes – Phase 1

Chapter 3

Chapter	Section	Topic	Type of Change	Description
3	2.5.A1.4C	Dispute Resolution	Modified	Narrows the scope of the provision to apply only to MACD orders. Changes the timeline for serving a *notice of dispute* related to MACD orders from two years to twenty *business days*. Removes references to January 1, 2004.
3	2.5.A1.4C1	Dispute Resolution	New	Provides a separate section for non-MACD-related matters previously covered by subsection 2.5A.1.4C. Preserves the two year timeline for serving a *notice of dispute* related to any non-MACD-previously covered by subsection 2.5A.1.4C.
3	2.6.1A.5	Dispute Resolution	New	Removes mandatory mediation from disputes related to MACD orders.
3	6.1A.1	Internal Compliance Programs	New	Obliges the IESO and market participants to develop and maintain an internal compliance program.
3	6.2.7	Dispute Resolution	Modified	Makes MACD's order authority subject to new advanced good faith negotiation provisions set

				out in sections 6.2.7B and 6.2.7C.
3	6.2.7B	Dispute Resolution	New	Authorizes MACD to offer an opportunity for advanced good faith negotiations prior to issuing an order.
3	6.2.7C	Dispute Resolution	New	Removes mandatory good faith negotiation for disputes related to MACD orders where not offered under section 6.2.7B.
3	6.2.10	Dispute Resolution	New	Clarifies that MACD may settle any compliance matter, in writing, at any stage of the compliance process
3	6.2B.6	Dispute Resolution	Deletion	Removes mandatory mediation from the process provided for enforcement of the General Conduct Rule.
3	6.2B.7	Dispute Resolution	Modified	Preserves mandatory good faith negotiations in the process provided for enforcement of the General Conduct Rule.

Market Manual 2.6

Manual	Section	Topic	Type of Change	Description
2.6	1.3.3.1	Dispute Resolution	New	Explains the application of and process for advanced good faith negotiation.

Statement of Approach on Internal Compliance Programs

Document	Section	Topic	Type of Change	Description
SOA on ICPs	3.2	Internal Compliance Programs	Modified	Deletes references to internal compliance programs being optional. Refers to new obligation to develop and maintain internal compliance programs.

SOA on ICPs	Several	Internal Compliance Programs	Modified	Minor updates and clean up edits.

Statement of Approach on Service Standards

Document	Section	Topic	Type of Change	Description
SOA on Service Standards	All	Service Standards	New	Introduces new service standards for MACD actions.