

Feedback Form

IESO Market Rule Amendments, Chapter 3

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the [Market Rule Amendments, Chapter 3 engagement webpage](#) unless otherwise requested by the sender.

Following the November 21, 2023, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on items discussed. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by **December 5, 2023.** If you wish to provide confidential feedback, please submit as a separate document, marked "Confidential". Otherwise, to promote transparency, feedback that is not marked "Confidential" will be posted on the engagement webpage.

Amendments

Item	Feedback
Do you have any feedback on the market rule amendments presented and posted for stakeholder review?	See General Comments, below.

General Comments/Feedback:

APPPrO has concerns with the proposed Chapter 3 amendment package.

The proposal fails to include the recent amendment to Market Manual 2.6 (Version 22.0) effective September 13, 2023 removing the protection afforded to market participants to have a publication of a summary of a MACD investigation stayed if a participant issues a notice of dispute. This is a significant change to market participant rights with material impacts, and is directly related to stakeholders' ability to evaluate and provide feedback on the proposed Chapter 3 amendment package. The way the market manual amendment was made is not how we understood earlier work by the IESO and the *Governance and Decision-Making Advisory Group* (MDAG) to proceed. We refer here to both the *Report & Recommendations re. Consultations with the Advisory Group on Market Rule Governance & Decision-Making Processes* (Nov. 2018) and the IESO's *Market Rules and Manuals Framework Presentation for Technical Panel* (Feb. 2020). The market manual amendment, as well as the items that have been included in the Chapter 3 amendment package, presents significant and material impacts to market participants which require sufficient time for stakeholder consultation and consideration.

Moreover, TP is currently without a second generator representative.

As APPPrO members are significantly impacted by these changes, introducing any enforcement-related materials should not take place until a second generator representative has been selected and on-boarded. In our view, it would be appropriate and consistent with the MDAG work previously done, for the IESO to withdraw the Chapter 3 amendment package proposal and resubmit it as part of a new comprehensive amendment package (including the aforementioned amendment to MM 2.6 made effective September 13, which should be retracted in the interim) with a longer timeline than has been proposed for stakeholder engagement, and after a new generator TP member has been appointed and brought up to speed.

Thank you.