

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:

Northland Power Inc. would echo the following comments made by APPRO in its submission.

“As APPRO 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.”

During the engagement session, MACD explained that it would engage with third party organizations including non-market participants to corroborate information it obtained from the market participant as part of its investigation. For any information exchanged with third parties, MACD should execute an NDA and provide strict guidance to the organization on how information obtained via the exchange of information with MACD be used. For publicly traded companies and/or ones in competitive procurement processes, any information that may be misinterpreted or used that can negatively affect the market participant should be minimized and measures should be put in place to ensure these organization maintain strict confidentiality in discussing any matter with MACD. If MACD intends on sharing any confidential information with any third party, MACD should notify the market participant of it's plan to do so in advance.

It would also be helpful for MACD explain the process it followed to propose the increase in penalties. A cursory review of neighbouring jurisdictions and/or regulators (e.g., FERC) suggests these penalties may be one of the highest in North America. It would be helpful to understand the process MACD followed to land on these changes.

Thank you.