

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?	
Market Rules Chapter 3, Section 2.5.1A.4AA	<p>Previously, participants had the right to prevent public disclosure of information subject to the dispute resolution process if a notice of dispute was filed within 10 business days. In consideration to the deletion of the 10 business day dispute filing in Market Manual 2.6, please explain MACD's contemplated process for disclosing participant information including participant name and nature of breach in relation to the notice of dispute process. In addition, OPG is unclear how the new timelines will apply in its ability to engage with MACD in advance of public disclosure. OPG believes that process diagrams found in Market Manual 2.6 do not provide sufficient information in regards to the discrete steps under this circumstance.</p>
Market Rules Chapter 3, Section 2.5.3C	<p>OPG recommends that added language in Section 2.5.3C is enhanced to recognize the minimum period of 30 days stipulated in Section 2.5.3A and that the added language would only apply after that period has closed.</p>
Market Rules Chapter 3, Section 5.3.1.5B	<p>OPG believes this addition is too broad, unwarranted and adds undue risk including potential reliability risks (e.g., cybersecurity) to market participants without any value to the IESO. The proposed language provides the IESO with an unprecedented ability to disclose confidential information of market participants without their consent. Furthermore, there are no provisions under this section that require a 3rd party to prevent further disclosure of confidential information.</p> <p>OPG also believes that the existing provisions related to exceptions for the disclosure of confidential information in Section 5.3 are sufficient for the IESO to enforce the market rules. Would the IESO please provide examples of situations that may arise where disclosure of confidential information is required but would not be permitted under the exceptions provided in Section 5.3?</p>

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Market Rules Chapter 3, Section 6.2.4.3	OPG would like to request additional information on the rationale behind the inclusion of reference to interviews and further if these would include 3 rd party interviews. OPG has concerns that 3 rd party involvement may create additional risks.
Market Rules Chapter 3, Section 6.6.6	<p>Please confirm that the revised values for the range of sanctions will only be applied against non-compliance events that may occur following the effective date of the amended rules (i.e., not applied retroactively). Also, OPG would like to request any benchmarking efforts made by the IESO to ensure alignment with other jurisdictions with similar enforcement frameworks.</p> <p>The proposed increased penalties also increase the range within which penalty determinations are made. OPG would like to request any additional information as to how a specific value within this range will be determined.</p>
Market Manual Part 2.6, Section 1.3.1	OPG is concerned that replacing the ring-fence and access to confidential information restrictions with an assertion of MACD independence, does not follow the stated objective of the Market Rule proposal. The current language provides specific limitations to the IESO's MACD business unit to limit sharing of "files and investigative information" to only MACD staff. This ensures that MACD is operating independently. As such, OPG encourages the IESO to retain the existing language.

General Comments/Feedback: