

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. If you wish to provide confidential feedback, please mark as "Confidential".

Following the February 6, 2024, 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 February 20, 2024.

Amendments

Item	Feedback
<p>Do you have any feedback on the market rule amendments presented and posted for stakeholder review?</p>	<p>Capital Power would like to thank IESO’s Market Assessment and Compliance Division (MACD) for taking the time to explain the intent behind the proposed Chapter 3 market rule amendments during the February 6th engagement session, and for providing their February 12th written response to stakeholder feedback submitted on December 5th.</p> <p>Capital Power continues to have concerns with the amendments, particularly as it relates to the proposed changes to 5.3.1B. How the amendment is written has broad interpretation and, as expressed in our December 5th submission, gives MACD extensive discretion to disclose confidential information and bypass protections established within the market rules.</p> <p>Within the engagement session, MACD mentioned that it is contemplating the disclosure of confidential information to other market participants or third parties without notice to the owner of the information during an investigation. Such disclosures, among other disclosures, could result in serious and foreseeable harm to competition, market participants, and market operations including the enforcement of the rules themselves. Further, the examples provided during the engagement session does not reasonably justify the disclosure of confidential information.</p> <p>Capital Power has expressed other concerns within our January 15th, 2024 submission that remains unaddressed. The proposed changes are not limited to any specific stage of the IESO’s enforcement and are not supported by a framework to evaluate potential harm to the market, market participants, or other persons. Other implications such as potential disputes of a contravention or involvement of other regulatory authorities have not been considered.</p>

General Comments/Feedback: