

05/03/2022

RE: April 19, 2022 IESO Technical Panel Meeting

Dear IESO Stakeholder Engagement the IESO Technical Panel,

This letter is written in support of the comments submitted by the Advanced Energy Management Alliance (AEMA). Voltus is a member of the AEMA and was involved in the drafting of these comments.

In addition, Voltus would like to emphasize our disappointment in the quality of the stakeholder engagement on these rules. Voltus believes it is unacceptable that the response by IESO staff to feedback that the rules as written could create adverse incentives for market participants was met with threats of enforcement action, not dialogue on how rules could be better formed to drive IESO desired outcomes without these adverse incentives. Moreover, it is clear that the rules as written have been rushed and do not meet the declared intent of the design. This is most obvious in the last minute engagements to rush final HDR rule amendments in the past two weeks after key stakeholders have voiced repeated issues with the proposed rules since November 2021. Voltus does appreciate the effort undergone by IESO staff, but rules like these are important and this process has not been on par with the attention that the IESO traditionally gives the stakeholder process.

As a result, Voltus requests that the market rule amendments focused on Capacity Qualification and Performance Assessment for the HDR resource be removed from the Capacity Auction Enhancement package until a set of rules have been fully stakeholdered, and the Technical Panel is able to review a completed set of market rule amendments.

Voltus is available to discuss our submission and the AEMA submission further. We look forward to ongoing engagement with the IESO on the next round of Capacity Auction rule amendments.

Best regards,



Michael Pohlod
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Voltus Energy Canada, Ltd.