

From: Lukas Deeg <[REDACTED]>
Date: August 30, 2024 at 8:24:51 PM EDT
To: Trisha Hickson <[REDACTED]>
Cc: Michael Lyle <[REDACTED]>
Subject: RE: August 27 TP MRP Meeting Follow-Up (MPM WG)

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Hello Trisha,

I would like to thank the IESO and the MRP team for the continued engagement on market power mitigation and the work being undertaken to address concerns.

In addition to the changes to the language that you included in your email, I would recommend that the provision also be amended as follows:

A.2 The *IESO* shall establish a working group the objective of which will be to assist in identifying unintended outcomes of the market power mitigation framework and ~~considering~~ recommending means to address such unintended outcomes, including avenues for recourse. The working group shall serve as an advisory body to the *IESO* and the Technical Panel, and shall consist of both *IESO* staff and representatives from appointed by impacted parties. The working group will perform its function until a date that is one year following the *market transition completion*, or for such longer period as may be agreed to as between the *IESO* and the working group.

These changes clarify items that I understood from some of our last meetings and information shared in the presentations.

I would like to better understand who the IESO is considering as the “impacted parties” referenced in the provision. I assume the generating community will be well represented on the working group, but will there be others? Considering the complexity of market power mitigation, what qualifications will be considered?

I remain concerned whether the existing recourse mechanisms will sufficiently address unintended, adverse outcomes that may arise from the application of market power mitigation. This concern is especially valid if it uniquely applies to an individual market participant. With this in mind, I do believe Chapter 3 S 2.2 and 2.5 needs to be amended to clarify that the dispute resolution also applies for matters related to the application of market power mitigation and for situations where the Market Power Mitigation Working Group identifies unintended outcomes associated with market power mitigation.

Happy to jump on a call next week to further clarify my thoughts on these matters, if helpful.

Enjoy the weekend.

Lukas

Lukas Deeg

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Powering Change
by Changing Power™

From: Trisha Hickson <[REDACTED]>

Sent: Wednesday, August 28, 2024 9:27 AM

Cc: Michael Lyle <[REDACTED]>; David Short <[REDACTED]>
Subject: August 27 TP MRP Meeting Follow-Up (MPM WG)

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Good morning,

Thank you for the production discussion yesterday. Please see below information and request and let me know if you have any questions.

*Note the MR language is inserted as an image at the bottom of this email. Let me know if you have any issues seeing it.

Below you will find an update to the proposed language creating an obligation on the part of the IESO to establish a Market Power Mitigation working group (MPM WG).

The update introduces two changes to the wording of the market rule amendment proposal, based on feedback received from the Technical Panel. First, the update clarifies that the MPM WG would not only consider but could make recommendations with respect to how potential unintended outcomes of the MPM framework could best be addressed. The IESO understands that such recommendations could be technical or procedural and could include recommendations with respect to the urgency of any related market rule amendment proposal.

The second update expands the MPM WG's role from an advisory body to the IESO to an advisory body to both the IESO and the Technical Panel. The IESO understands that the recommendations of the MPM

WG could assist the Technical Panel in formulating its own advice and recommendations to the IESO Board.

Some panel members expressed an interest in further exploring additional recourse mechanisms specific to addressing unintended outcomes of the MPM framework. It is not clear to the IESO what such recourse mechanisms might entail and the IESO does not believe that deviation from the established mechanisms is warranted at this time. However, the IESO recognizes the possibility that operational experience with the MPM framework may suggest further refinements to the design, including with respect to avenues for recourse. Market rule amendments to reflect such refinements could be proposed on the basis of recommendations from the MPM WG and could be stakeholdered in the ordinary course. The Technical Panel can, on its own initiative, determine that an amendment to or a review of a market rule may be warranted.

The IESO intends to publish the updated proposed language as part of the Final Alignment Market Rule Amendment Proposal Package by September 3rd.

Please forward any comments or questions with respect to the proposed language directly to [REDACTED] by Friday August 30th.

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Regards,
Trisha

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