

From: Vladislav Urukov
Sent: September 29, 2025 2:44 PM
To: Trisha Hickson; David Short
Cc: Jo Chung
Subject: RE: IESO Technical Panel September 9 - Meeting Materials

Hi Trisha,

I alerted Jo that I am still making my way through the [Post Go-Live True-Ups for the Renewed Market](#) materials. One item seems possibly a bit more significant and hence I will share it now (I will also keep it in my full list).

The change to 22.3.3.7 made me look a bit broader at sections 22.3.3 and 22.13. As part of that review, I noticed the following possible issue (somewhat like the one we are correcting):

Specifically, as per 22.3.3 in instances when a market participant fails to provide the information or supporting documentation required by the IESO pursuant to section 22.1.3, the *energy per ramp hour reference level* is subject to:

22.3.3.9 *minimum energy per ramp hour reference levels for each thermal state: 0 MWh; and*

22.3.3.10 *maximum energy per ramp hour reference levels for each thermal state: 1 MWh multiplied by the resource's minimum loading point reference level.*

These are then subject to:

22.13 where

22.13.1 The IESO shall validate a *dispatchable resource's non-financial dispatch data parameters* against its corresponding *reference level values* at the time the *registered market participant* for a *resource* submits a *non-financial dispatch data parameter* by evaluating whether the *resource's* submitted *non-financial dispatch data parameter* exceeds the corresponding *reference level value*. A submitted *non-financial dispatch data parameter* shall be rejected if it violates any of the following:

22.13.1.11 *energy per ramp hour* is greater than:

22.13.1.11.1 50% above the upper bound *reference level value* for any *thermal state*, or

22.13.1.11.2 50% below the lower bound *reference level value* for any *thermal state*, or

Here are my issues:

1. I don't think the words "minimum" and "maximum" in 22.3.3.9 and 22.3.3.10 should be italicized as these words are not in Ch 11 defined on their own or as the full term.
2. Delete "or" in 22.13.1.11.2
3. Most significantly, I read the rejection in 22.13.1 as

"parameters **shall be rejected** if it violates....***energy per ramp hour is greater than*** 50% above the upper bound reference level value for any thermal state or **50% below the lower bound reference level value for any thermal state**.

Based on the bolded language, it seems to me that if the "lower bound reference level value" is set to zero as per 22.3.3.9, then any value which is greater than 50% of zero (or zero) will be rejected.

In summary, I think 22.13.1.11.2 is not permissive in a similar way the maximum number of starts per day wasn't thereby creating a need to change the language.

Vlad



Vlad Urukov