

Stakeholder Comment Request – Draft Market Rules and Market Manuals

MR-00439-R00-05 – Transitional Capacity Auction

<p>Date Submitted: 2019/06/05</p> <p>Feedback Due: June 5, 2019</p>	<p>Feedback provided by:</p> <p>Company Name: Rodan Energy Solutions</p> <p>Contact Name: ___Dave Forsyth_____</p> <p>Phone: _____</p> <p>Email: _____</p>
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Please provide comments relating to the section of the draft amendment proposal in the corresponding box. Please include any views on whether the draft language clearly articulates the requirements for either the IESO or market participants. Please provide any alternative language by inserting the draft language below and red-lining the suggested changes.

MR Chapter	Design Element (MR section)	Stakeholder Comments
2	Participation	<i>Stakeholder comments to be included here.</i>
2 (app)	Appendices	
3	Administration, Supervision, Enforcement	
7	System Operations and Physical Markets	18.9 – Obligation Transfers – support transfers in similar priced zones Rodan supports the new section 18.9.1.5B that permits the transfer of capacity between zones when the Auction clearing price in the two

		respective zones are equal to the Ontario TCA clearing price.
9	Settlements and Billing	
11	Definitions	

MM	Design Element (MM section)	Stakeholder Comments
1.1	Participant Authorization	<i>Stakeholder comments to be included here.</i>
1.2	Facility Registration	
1.3	Identity Management	
2.10	Connection Assessment	
4.3	Real-time Scheduling of the Physical Market	
5.4	Prudential Support	
5.5	Physical Market Settlement Statements	
6	Participant Technical Reference Manual	
7.3	Outage Management	
12	Definitions	

Stakeholder comment is requested on the following IESO directed questions that will be forwarded to Technical Panel for their consideration in the recommendation of market rules to the IESO Board of Directors:

Question	Stakeholder Comment
Do you believe there is a clear and common understanding of the intent and purpose of the draft market rule amendment?	Yes. Rodan believes the market rule amendments clearly represent the IESO's intent.
In your view, is this market rule amendment in the interest of consumers with respect to prices?	Yes
In your view, is this market rule amendment in the interest of consumers with respect to the reliability of electricity service?	Based on the IESO's Outlook for resource adequacy, this market rule will help satisfy future anticipated shortfalls.
In your view, is this market rule amendment in the interest of consumers with respect to the quality of electricity service?	No
In your view, are there any adverse effects (not identified in a previous answer) that may be caused by implementing these proposed changes, either to consumers or market participants.	Rodan believes the Demand Response providers will not be properly compensated for the delivery of demand response for following dispatch instructions. This will have an adverse and discriminatory affect on their ability to fairly compete in the TCA Auction process as generation resources will have access to additional markets and revenue streams.
General Comments:	