

Stakeholder Comment Request – Draft Market Rules and Market Manuals

MR-00439-R00-05 – Transitional Capacity Auction

Date Submitted: 2019/06/04 Feedback Due: June 5, 2019	Feedback provided by: Company Name: Association of Major Power Consumers in Ontario (AMPCO) Contact Name: Colin Anderson Phone: [REDACTED] Email: [REDACTED]
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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	

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?	
In your view, is this market rule amendment in the interest of consumers with respect to prices?	

In your view, is this market rule amendment in the interest of consumers with respect to the reliability of electricity service?	
In your view, is this market rule amendment in the interest of consumers with respect to the quality of electricity service?	
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.	AMPCO believes that the current market rules being developed for the Transitional Capacity Auction (TCA) will result in a serious adverse effect, in the form of discriminatory treatment against a class of market participant, as set out in AMPCO's submission to the IESO dated May 2, 2019.
<p>General Comments:</p> <p>In general, this submission focuses on only one element of the TCA where AMPCO has material comments. AMPCO's silence on any other issue / market rule / market manual should not be interpreted as approval. It should be interpreted as taking no position.</p>	